

**Crown Agents
Bank**



Pillar 3 Disclosures

31 December 2024

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Acronyms and Abbreviations

The following terms are used throughout these Disclosures:

ALCo	Asset and Liability Committee
ASF	Available Stable Funding
BAC	Board Audit Committee
BIA	Basic Indicator Approach
BCBS	Basel Committee on Banking Standards
BRC	Board Risk Committee
C-SREP	Capital Supervisory Review and Evaluation Process
CAB	Crown Agents Bank Ltd
CAB Payments	CAB Payments Holdings Plc consolidated group
CCB	Capital Conservation Buffer
CCF	Credit Conversion Factor
CCR	Counterparty Credit Risk
CCyB	Countercyclical Buffer
CEO	Chief Executive Officer
CET1	Common Equity Tier 1 Capital
CFO	Chief Financial Officer
CIU	Collective Investment Undertakings
COREP	Common Reporting Framework
CRC	Credit Risk Committee
CRD	Capital Requirements Directive
CRM	Credit Risk Mitigation
CRMP	Credit Risk Management Policy
CRO	Chief Risk Officer
CRR	UK Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Valuation Adjustment
EBA	European Banking Authority
ECAI	External Credit Assessment Institutions
ERC	Executive Risk Committee
ERMF	Enterprise Risk Management Framework
EVE	Economic Value of Equity
EWI	Early Warning Indicator
EXCO	Executive Committee
FCA	Financial Conduct Authority
FCRC	Financial Crime Risk Committee
FSCS	Financial Services Compensation Scheme
FX	Foreign Exchange
Group	CAB Payments Holdings Plc consolidated group
HQLA	High Quality Liquid Asset
IAF	Internal Audit Function
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Internal Liquidity Adequacy Assessment Process
INED	Independent Non-Executive Director
IRRBB	Interest Rate Risk in the Banking Book
ISDA	International Swaps and Derivatives Association

LREQ	Firm subject to the minimum Leverage requirements
L-SREP	Liquidity Supervisory Review and Evaluation Process
LCP	Liquidity Contingency Plan
LCR	Liquidity Coverage Ratio
LTIP	Long Term Incentive Plan
MLRO	Money Laundering Reporting Officer
MRT	Material Risk Takers
NED	Non-Executive Director
NMDs	Non Maturing Deposits
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
ORC	Operational Risk Committee
PRA	Prudential Regulation Authority
PvP	Payment Versus Payment
RAS & TL	Risk Appetite Statement and Tolerance Limits
RCSA	Risk and Control Self-Assessments
Remco	Remuneration Committee
RP	Recovery Plan
RSF	Required Stable Funding
RWAs	Risk Weighted Assets
SFTs	Securities Financing Transactions
SREP	Supervisory Review and Evaluation Process
TCR	Total Capital Requirement

1. Introduction

This document sets out Crown Agents Bank Ltd's (the "Bank" or "Crown Agents Bank") Pillar 3 disclosures at 31 December 2024 in accordance with the requirements of the UK Capital Requirements Regulation ("CRR").

The Bank's immediate parent is CAB Tech Holdco Limited whose parent is CAB Payments Holdings plc.

The Bank is authorised by the Prudential Regulation Authority ("PRA") and regulated by the PRA and the Financial Conduct Authority ("FCA"). The PRA sets requirements for CAB relating to capital and liquidity adequacy and large exposures.

Disclosure Framework

The Bank is regulated for prudential purposes under the Basel 3 regime, the international regime governing capital and liquidity in banks, which is supervised by the Basel Committee on Banking Supervision ("BCBS"). The Pillar 3 disclosures made by Crown Agents Bank are designed to comply with Part VIII of the CRR and associated on shored binding Technical Standards and guidelines from the European Banking Authority ("EBA") which were incorporated into the disclosure (CRR) part of the PRA Rulebook from 1 January 2022.

The framework consists of three 'pillars', as summarised below:

Pillar 1

Minimum capital and liquidity requirements

Defines the rules for the calculation of credit, market, operational and liquidity risk to ensure that banks hold adequate resources against the risks they assume within their current business.

Pillar 2

Supervisory review process

Sets out the key principles for the supervisory review of a bank's risk management framework and its capital and liquidity adequacy. It sets out specific oversight responsibilities for both the Board and senior management, thereby reinforcing the principles of internal control and other corporate governance practices.

Crown Agents Bank performs an internal capital adequacy assessment process ("ICAAP") and an internal liquidity adequacy assessment process ("ILAAP") on at least an annual basis to assess the risk management processes in place and whether additional regulatory capital and liquidity over and above Pillar 1 should be held. The amount of any proposed additional capital and liquidity requirement is also assessed by the PRA during its capital supervisory review and evaluation process ("C-SREP") and its liquidity supervisory review and evaluation process ("L-SREP"). This review aims to ensure that institutions have adequate quality and quantity of capital and liquidity as well as suitable arrangements, strategies and processes to ensure sound management and coverage of their risks.

Pillar 3

Market discipline

Pillar 3 complements Pillars 1 and 2 and aims to encourage market discipline by developing a set of disclosure requirements which allow market participants to assess key pieces of information regarding a firm's capital, liquidity risk exposures, risk management processes, leverage, and remuneration. Pillar 3 sets out the items covered by this report.

Basis and Scope of Disclosures

This document has been prepared and should be read in conjunction with the Bank and Group's Annual Report for the year ended 31 December 2024. These disclosures have been subject to internal verification and have been reviewed by the Board Audit Committee ("BAC"). These disclosures have not been externally audited and do not constitute any part of the Bank's financial statements; however, some of the information within the disclosures also appears in the Annual Report.

Article 432 of the CRR states that institutions may omit one or more of the Pillar 3 disclosures if the information is not regarded as material. Information shall be regarded as not material if the Bank does not expect that its omission or misstatement would change or influence the assessment or decision of a user relying on that information for the purpose of making economic decisions. These disclosures have been compiled on the most appropriate basis for this purpose and following the instructions on calculation and classification given in the PRA Rulebook and therefore may not agree directly with disclosures addressing similar matters presented in the Annual Report.

The Bank has published its Pillar 3 Disclosures on a semi-annual basis since H1 2023. Disclosures comply with the disclosure requirements laid out in the CRR.

The disclosures:

- Are based on the results of the year ended 31 December 2024. They include the impact of the 2024 financial performance and have been updated to reflect the most recent operational risk capital requirements.
- Should be read in conjunction with the Bank's Annual Report and Financial Statements.
- Have not been, and are not required to be, subject to independent external audit and do not constitute any part of the Bank's Financial Statements.
- Are published on the Bank's website once approved by the BAC.

Regulatory Developments

The following regulatory developments relevant to the Bank have been published since the preparation of the prior Pillar 3 disclosures.

On 17 January 2025, the PRA delayed the UK implementation start date of Basel 3.1 from 1 January 2026 to 1 January 2027.

On 12 September 2024, the PRA published policy statement PS9/24 - the implementation of the Basel 3.1 standards which covers credit risk and disclosure requirement elements of Basel 3.1. The Bank has undertaken preliminary assessments of the impact of Basel 3.1 and it is not expected to materially adversely affect any of the Bank's key regulatory metrics.

In addition, it is expected that the Group will have to prepare a Solvent Exit Plan from 1 October 2025 as per PS5/24.

Approval of Disclosures

The Bank's Pillar 3 disclosures have been reviewed and approved by BAC. The BAC considered the disclosures document in light of (i) the Annual Report; (ii) the ICAAP; (iii) the ILAAP; and (iv) its overall understanding of Crown Agents Bank's risk profile.

The Pillar 3 disclosures have been subject to senior management review and sign off and are attested to by the Bank Chief Financial Officer ("CFO") and Chief Risk Officer ("CRO").

2. Key metrics and Overview of risk weighted exposure amounts

UK KM1 – Key Metrics

The table below summarises the main prudential regulatory ratios and measures.

	£000s	31 Dec 2024	30 Jun 2024	31 Dec 2023
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	126,265	122,958	115,358
2	Tier 1 capital	126,265	122,958	115,358
3	Total capital	126,265	122,958	115,358
Risk-weighted exposure amounts				
4	Total risk-weighted exposure amount	627,016	530,869	436,220
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	20.1%	23.2%	26.4%
6	Tier 1 ratio (%)	20.1%	23.2%	26.4%
7	Total capital ratio (%)	20.1%	23.2%	26.4%
Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)				
UK 7a	Additional CET1 SREP requirements (%)	2.5%	2.5%	2.5%
UK 7d	Total SREP own funds requirements (%)	12.4%	12.4%	12.4%
Combined buffer requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	2.5%	2.5%	2.5%
9	Institution specific countercyclical capital buffer (%)	0.4%	0.3%	0.2%
11	Combined buffer requirement (%)	2.9%	2.8%	2.7%
UK 11a	Overall capital requirements (%)	15.2%	15.2%	15.1%
12	CET1 available after meeting the total SREP own funds requirements (%)	13.2%	16.2%	19.5%
Leverage ratio (see note 1)				
13	Total exposure measure excluding claims on central banks	1,695,874	1,546,093	1,584,105
14	Leverage ratio excluding claims on central banks (%)	7.4%	8.0%	7.3%
Liquidity Coverage Ratio (see note 2)				
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	1,111,440	1,075,915	1,114,654
UK 16a	Cash outflows - Total weighted value	989,420	927,415	877,292
UK 16b	Cash inflows - Total weighted value	174,615	150,724	132,613
16	Total net cash outflows (adjusted value)	814,805	776,692	744,678
17	Liquidity coverage ratio (%)	136.4%	138.5%	149.7%
Net Stable Funding Ratio (see note 3)				
18	Total available stable funding	210,991	218,979	214,380
19	Total required stable funding	161,171	163,531	134,472
20	NSFR ratio (%)	130.9%	133.9%	159.4%

- (1) Rows 14a-14e have been removed as only LREQ firms are required to disclose this information.
- (2) Figures presented are for a 12 month average as at the period end
- (3) Figures presented are for a 4 quarter average as at the period end.

Regulatory Capital and RWAs

The Bank's CET1 capital ratio has decreased by 6.3 percentage points to 20.1% between FY 2023 and FY 2024. The capital ratio reduction is a result of the larger increase in Risk Weighted Assets ("RWAs") relative to the increase in the capital base. The increase in RWAs is due to greater operational risk requirements following the recognition of 2024 revenue as well as an increase in credit risk exposures, which was predominantly driven by an increase in trade finance activity. The increase in RWAs was in part offset by a £10.9m increase in regulatory capital, following the recognition of the 2024 retained earnings, which is net of an increase in capital expenditure on intangible assets. For more information on the CET1 capital, RWAs and capital ratios, see template UK OV1.

Note that the H2 2024 profit has not been included in December 2024 COREP returns that were submitted to the regulator as these profits were not verified at that point. The external audit has since been concluded and therefore the H2 profit for 2024 has been included in the COREP metrics disclosed in this document.

Leverage

The leverage ratio increased by 0.1 percentage points in 2024. This was due to an increase in regulatory capital following the recognition of 2024 profit. This was partly offset by an increase in leverage exposure driven by higher deposit volumes year on year.

Liquidity and funding

The 12-month average LCR decreased to 136% from 150%. This was primarily due to a greater proportion of deposits maturing within the 30d window. This was partially offset by an increase in inflows, which was primarily a result of increased fixed term loans maturing in the 30 day LCR window.

The average NSFR decreased to 130.9% from 159.4%. This decrease was primarily due to increased allocations into CIUs that do not qualify as HQLA, in addition to greater lending exposures, which increased Required Stable Funding ("RSF"). This RSF increase was partially offset by the recognition of 2024 retained earnings as Available Stable Funding ("ASF").

3. Risk Management Policies and Objectives

UK OVA – Risk Management Approach

Protecting and leveraging Crown Agents Banks' business model is a key strategic objective with effective risk management being central to every facet of decision making. Effective risk management is recognised as an integral component of good management and governance, to minimise losses and maximise business opportunities for all key stakeholders, including shareholders, customers, colleagues, and regulators.

The Bank manages its risks through a consistent approach based on a set of overarching principles, namely:

- Adhering to our established and proven business model, as outlined on pages 8-10 of the CAB Annual Report.
- Implementing an integrated risk management approach based on the concept of three lines of defence.
- Setting and operating within clearly defined risk appetites, monitored with defined metrics and limits.

Enterprise Risk Management Framework

The Bank employs an Enterprise Risk Management Framework ("ERMF") to provide the Board and senior management with a single, group wide, view of the material risks to which it is exposed. It aligns the overall strategic and commercial objectives approved by the Board whilst supporting the effective management of risks. The ERMF sets out how the Bank manages these risks in a consistent way to minimise losses and maximise positive outcomes for all key stakeholders ensuring that legal and regulatory requirements, in each jurisdiction, are met.

The framework is founded on a three lines of defence model, details the core risk management components and structures used across the firm, and defines a consistent and measurable approach to identifying, assessing, controlling, mitigating, monitoring, and reporting risk. The framework is purposely designed to allow the capture of business opportunities whilst maintaining an appropriate balance of risk and reward within the Bank's agreed risk appetite.

Risk appetite forms a key component of Crown Agents Bank's risk management framework and refers to the sources and levels of risk the Bank is willing to assume to achieve its strategic objectives and business plan. The risk appetite is managed through an established framework that facilitates ongoing communication between the Board and management regarding the Bank's evolving risk profile. Risk appetite is set on a top-down basis by the Board with consideration to business requests and executive recommendation. Appetite measures, both qualitative and quantitative, are applied to inform decision-making, monitoring and reporting processes. Supplementary early-warning triggers are also employed to drive required corrective action before overall tolerance levels are reached. The Bank conducts a formal review of its risk appetites annually, as part of the strategy-setting process. This aligns risk-taking with the achievement of strategic

objectives. Adherence is monitored through the Bank's risk committees on an ongoing basis with interim updates to individual risk appetites considered as appropriate through the year.

The ERMF is approved by the Board on the recommendation of the Board Risk Committee ("BRC") and the Executive Risk Committee ("ERC") and subsequently adopted by the Bank.

Throughout the year, the Board, assisted by BRC and the BAC, monitor Crown Agents Banks' risk management and internal control systems and review their respective effectiveness. This process covers all material controls, including financial, operational and compliance controls. Monitoring and effectiveness reviews occur through: regular risk management information and commentary, reviews of bank-wide risk and control self-assessments and associated mitigation activities and review of audit reports which focus upon risk management capabilities and the control framework.

The Board also reviews the effectiveness of the BAC and BRC on an annual basis. The Board has reviewed Crown Agents Bank risk management and internal control framework and the committees' effectiveness and considers that, overall, the Bank has in place adequate systems and controls. As described in more detail in the Governance section of the CAB Payments Annual Report, an evaluation of the effectiveness of the Board and its committees was undertaken during the year in line with the requirements of the UK Corporate Governance Code; the results confirm that the BRC is operating effectively. The BRC considers that during the year it continued to have access to sufficient resources to enable it to carry out its duties and has continued to perform effectively.

A comprehensive overview of the Bank's risk management objectives, policies and governance arrangements is set out in the Governance section of the Annual Report. Replication of this disclosure has not been included in this document. Crown Agents Bank's Annual Report is published on the Bank's corporate website.

Through its normal operations Crown Agents Bank is exposed to various key risks, which are captured by the bank-wide risk Taxonomy. The firm's 'level 1' risks are:

Financial Risk Types

- Capital Adequacy Risk
- Liquidity and Funding Risk
- Market Risk
- Credit Risk

Non-Financial Risk Types

- Business Risk
- Operational Risk
- Financial Crime Risk
- Regulatory and Compliance Risk
- Conduct Risk

The Bank's Board is responsible for determining the long-term strategy of the business, the markets in which it operates and the level of risk acceptable to Crown Agents Bank. The level of risk acceptable to the Bank is controlled through its Risk Appetite Statement and Tolerance Limits ("RAS & TL") for the firm's 'level 1' risks.

Risk Governance

Risk governance, underpinned by the Three lines of Defence model, helps to ensure that the right

Three Lines of Defence

The Bank operates a tripartite risk governance framework, generally known as the three lines of defence model, which distinguishes between risk management and oversight. The approach provides clear and concise separation of duties, roles and responsibilities.

decisions are made by the right people at the right time. It describes the responsibilities and committee structure which facilitate oversight, challenge and robust decision making.

It is also an important element of how CAB's Board and Senior Management discharge their responsibilities as part of the broader management and oversight of the Bank's activities.

First line of defence

Risk and control management

The business and senior managers, are responsible and accountable for the identification, assessment and management of individual risks, as well as associated controls within their respective areas of responsibilities.

Second line of defence

Risk and control oversight

Risk and Compliance provides independent oversight and challenge with respect to the first line's management of their risks and controls. They provide assurance that the regulated activities are undertaken in accordance with regulatory requirements.

Third line of defence

Internal Audit

Internal audit is an independent provider of assurance over the effectiveness processes and governance, with regards to risk and internal controls.

Risk Governance structure

The Bank's risk governance structure is outlined below:

The Board

The Board is responsible for setting the strategy, corporate objectives, and risk appetite. The Board reviews the Bank's ERMF annually to ensure that it remains fit for purpose and complies with relevant laws and regulations including the UK Corporate Governance Code.

Board Committees

Risk Committee

Responsible for assisting the Board in approving and overseeing the Bank ERMF. Provides the Board with recommendations and advice on key matters relating to risk and compliance. It receives risk reporting and escalations from the Executive Risk Committee.

Audit Committee

Responsible for assisting the board on matters relating to financial reporting and financial controls.

Management Committees

Executive Committee ("ExCo")

The Executive Committee is chaired by the Bank's Chief Executive Officer ("CEO") and is responsible for developing, proposing, and implementing Board approved strategy.

Executive Risk Committee ("ERC")

The Executive Risk Committee is chaired by the Bank's Chief Risk Officer ("CRO") with members being the Executive Committee and the Money Laundering Reporting Officer ("MLRO"). It provides Executive level enterprise-wide risk management oversight and escalates key risks issues and recommendations to the Risk Committee in line with the approved ERMF. It also receives escalation from its five risk sub-committees.

Asset & Liability
Risk Committee
(ALCO)

Operational
Risk Committee
(ORC)

Credit & Lifecycle Risk
Committee
(CRC)

Financial Crime
Risk Committee
(FCRC)

Treasury
Committee

Financial Crime
Systems
Committee

Board Level Governance

Bank Board

The Bank's Board is the primary governing body for the Bank and has ultimate responsibility for setting its strategy, corporate objectives, and risk appetite.

From a Risk Management perspective, the Crown Agents Bank Board is responsible at a Bank level for:

- Approving the strategy, 3-year financial plan and annual budgets, considering the impact on risk appetite, wider risk management profile and risk related activities.
- The establishment, approval, and periodic review (at least once per calendar year) of the ERMF (including the enterprise risk taxonomy).
- The establishment, approval, and periodic review (at least once per calendar year) of the RAS & TL, which sets out the levels of risk which Crown Agents Bank is willing to accept.
- Periodic review and approval of the ICAAP, ILAAP, Funding Plan and Recovery Plan ("RP") and Money Laundering Reporting Officer's ("MLRO") report at least once per calendar year.
- Setting the tone and culture for risk management.

The Bank's Board also maintains a close oversight of current and future activities through a combination of regular Board reports and monthly financial results, including budgets, forecasts, and other operational reports.

Board Remuneration Committee ("Remco")

The Remco provides oversight ensuring that the Bank complies with its regulatory requirements in respect of remuneration. This includes:

- Determining and agreeing with the Board the framework or broad policy for the remuneration of the company's Chair and Executive (including the CRO).
- Reviewing the ongoing appropriateness and relevance of the remuneration policy.
- Determining, within the terms of the agreed policy, the total individual remuneration package of personnel designated as Code Staff, or Material Risk Takers ("MRTs") within the Bank.
- Approving the design of, and determining targets for, any performance related pay schemes operated by the Bank and approve the total annual payments made under such schemes.

Board Risk Committee ("BRC")

BRC provides oversight and advice to the Board on matters relating to risk and compliance. This includes:

- Advising the Boards on the overall risk appetite, tolerance and strategy, and the principal and emerging risks the Bank is willing to take in order to achieve its long-term strategic objectives.
- Review the adequacy and effectiveness of the ERMF. Consider and recommend any changes to the Board.
- Consider and recommend for approval the RAS & TL.
- Oversee management implementations of the ERMF and the embedding of risk appetite including risk culture and conduct.
- Review and approval of the Level 1 Risk Policies, as delegated by the Board.
- Review of key risk related assessments including (but not limited to) the ICAAP, ILAAP, Funding Plan, Recovery Plan and Annual MLRO report.

The BRC met 6 times throughout 2024.

Board Audit Committee ("BAC")

BAC provides oversight and advice to the Board on matters relating to financial reporting and internal financial controls, in particular reviewing:

- The integrity of the financial statements and Pillar 3 disclosures.
- The effectiveness of the Internal Audit Function ("IAF") and the external auditor.
- The effectiveness of internal controls and risk management systems regarding the financial reporting of the Bank.

UK OVB – Governance Arrangements

The number of external directorships held by members of the management body are detailed in the table below:

Name	Position	Directorships
Ann Cairns	Independent Non-Executive Chair	3
Neeraj Kapur	Chief Executive Officer	2
Richard Hallett	Chief Finance Officer	0
Simon Poole	Non-Executive Director	3
Noel Harwerth	Senior Independent Director	4
Caroline Brown	Independent Non-Executive Director	3
Karen Jordan	Independent Non-Executive Director	3
Susanne Chishti	Independent Non-Executive Director	2
Jennifer Johnson-Calari	Independent Non-Executive Director	3

Note that post 2024 year end, Richard Hallett resigned as Chief Financial Officer, effective 10 February 2025 and is no longer a director of CAB.

Board Diversity

The Committee, the Board of Directors, and the Bank continue to pay full regard to the benefits of diversity, including gender and ethnic diversity, when searching for candidates for the Board, the executive management team and all other appointments. We believe that better business decisions can be made by having representation from different genders and cultural backgrounds with differing skill sets, experience and knowledge which reflect our client base and the wider population.

Diversity of Board members is important to provide the necessary range of background experience, values and diversity of thinking and perspectives to optimise the decision-making process. Gender and ethnicity are important aspects of diversity which the Chair and the Committee will consider when deciding upon the most appropriate composition of the Board and its Committees.

This policy and its effectiveness will be reviewed annually by the Nomination Committee with any changes recommended to the Board for its approval. If necessary, this policy will be reviewed on an ad-hoc basis in consideration of any regulatory or governance developments in relation to Board diversity. For further information on diversity of the board, please see the CAB Payments Annual Report.

Recruitment policy

The recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise can be found on pages 66 to 69 of the CAB Payments Annual Report.

4. Differences Between Carrying and Regulatory Values

LI1 – Differences between accounting and regulatory consolidation and mapping of financial statement categories with regulatory categories.

The tables outlines the differences in the basis of consolidation for accounting and regulatory purposes.

£000s		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 market risk framework ¹	Not subject to own funds requirements or deduction from own funds
Breakdown by asset class according to the balance sheet in the published financial statements							
1	Cash and balances at central banks	584,679	584,679	584,679			
2	Money market funds	488,197	488,197	488,197			
3	Loans and advances on demand to banks	184,683	184,683	184,687			
4	Investments in debt securities	246,021	246,021	246,028			
5	Other loans and advances to banks	180,095	180,095	179,029			
6	Other loans and advances to non-banks	32,564	32,564	32,866			
7	Unsettled transactions	10,866	10,866	10,866			
8	Derivative financial assets	4,884	4,884		4,884		
9	Investments in equity securities	553	553	553			
10	Other assets	38,738	38,738	38,738			
12	Accrued income	925	925	925			
13	Property, plant and equipment	2,679	2,679	2,679			
14	Right of use assets	16,830	16,830	16,830			
15	Intangible assets	24,398	24,398				24,333
Total assets		1,818,011	1,818,011	1,787,976	4,884	0	24,333

£000s	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the market risk framework	Not subject to own funds requirements or deduction from own funds
Breakdown by liability classes according to the balance sheet in the published financial statements						
1 Customer accounts	1,589,481	1,589,481				1,589,481
2 Derivative financial liabilities	539	539		539		539
3 Unsettled transactions	35,173	35,173				35,173
4 Other liabilities	12,818	12,818				12,818
5 Accruals	9,160	9,160				9,160
6 Lease liabilities	17,076	17,076				17,076
7 Deferred tax liability	1,217	1,217				1,217
8 Provisions	1,949	1,949				1,949
Total liabilities	1,667,414	1,667,414	0	539	0	1,667,414

(1) Note that all accounting assets and liabilities are used to calculate the market risk requirement.

LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements

The below table provides a reconciliation between assets' carrying values under the regulatory scope of consolidation and the exposures used for regulatory purposes.

£000s		Total	Items subject to		
			Credit risk framework	CCR framework	Market risk framework ¹
1	Assets carrying value amount under the scope of regulatory consolidation (as per template LI1)	1,792,860	1,787,976	4,884	
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template LI1)	(539)		(539)	
3	Total net amount under the regulatory scope of consolidation	1,792,321	1,787,976	4,345	
4	Off-balance-sheet amounts	25,339	25,339		
5	Differences in valuations				
6	Differences due to different netting rules, other than those already included in row 2				
7	Differences due to consideration of provisions				
8	Differences due to the use of credit risk mitigation techniques (CRMs)				
9	Differences due to credit conversion factors	(17,432)	(17,432)		
10	Differences due to Securitisation with risk transfer				
11	Other differences	818	818		
12	Exposure amounts considered for regulatory purposes	1,801,046	1,796,701	4,345	

(1) Note that all accounting assets and liabilities are used to calculate the market risk requirement.

5. Capital Adequacy

Capital Adequacy Risk

Capital adequacy risk is defined as the risk of the Bank having insufficient quality or quantity of capital to support the relevant risks which may occur during the normal course of business or because of a stress scenario.

The Bank's Capital adequacy risk appetite is to ensure that it will maintain sufficient capital both in quantity and quality to meet regulatory requirements and hold a management buffer as agreed with the Board.

Capital adequacy is measured and monitored daily against internally agreed Board RAS & TL and Early Warning Indicator ("EWI") levels. Capital adequacy is reviewed monthly as a standing item at ALCo, with ERC and BRC maintaining additional oversight. Any capital issues are escalated as required to ALCo, and then onwards to ERC and BRC.

Capital Requirement

The minimum regulatory capital requirement is 8% of RWAs - the Pillar 1 requirement. Banks are also required to hold additional capital to cover risks not adequately captured in Pillar 1, which are known as Pillar 2A requirements. Jointly Pillar 1 + Pillar 2A sets the Total Capital Requirement ("TCR") and is the minimum amount of own funds capital that a bank needs to always hold.

The TCR is set by the PRA on a periodic basis, following completion of the ICAAP and C-SREP.

The Bank's Overall Capital Requirement ("OCR") is based on the total of the TCR + Capital Requirements Directive ("CRD") buffers. The CRD buffers are the Capital Countercyclical Buffer ("CCyB") and Capital Conservation Buffer ("CCB"). The Bank has complied with the capital requirements set by the PRA at all times throughout 2024.

CC1 - Composition of regulatory own funds

The table below summarises the composition of regulatory capital.

	£000s	Amounts	CC2 Reference
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	41,200	(a)
	of which: Called Up Share Capital	41,200	(a)
2	Retained earnings	109,398	(b)
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	150,598	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
8	Intangible assets (net of related tax liability) (negative amount)	(24,333)	(c)
UK-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		
UK-20b	of which: qualifying holdings outside the financial sector (negative amount)		
UK-20c	of which: securitisation positions (negative amount)		
UK-20d	of which: free deliveries (negative amount)		
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(24,333)	
29	Common Equity Tier 1 (CET1) capital	126,265	
59	Total capital (TC = T1 + T2)	126,265	
60	Total Risk exposure amount	627,016	
Capital ratios and buffers			
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	20.1%	
62	Tier 1 (as a percentage of total risk exposure amount)	20.1%	
63	Total capital (as a percentage of total risk exposure amount)	20.1%	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	9.8%	
65	of which: capital conservation buffer requirement	2.5%	
66	of which: countercyclical buffer requirement	0.4%	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	13.2%	

CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

£000s	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference to CC1
	As at period end	As at period end	
Assets - Breakdown by asset class according to the balance sheet in the published financial statements			
1	Cash and balances at central banks	584,679	584,679
2	Money market funds	488,197	488,197
3	Loans and advances on demand to banks	184,683	184,683
4	Investments in debt securities	246,021	246,021
5	Other loans and advances to banks	180,095	180,095
6	Other loans and advances to non-banks	32,564	32,564
7	Unsettled transactions	10,866	10,866
8	Derivative financial assets	4,884	4,884
9	Investments in equity securities	553	553
10	Other assets	38,738	38,738
12	Accrued income	925	925
13	Property, plant and equipment	2,679	2,679
14	Right of use assets	16,830	16,830
15	Intangible assets	24,398	24,398 (c)
Total assets		1,818,011	1,818,011

£000s	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference to CC1
	As at period end	As at period end	
Liabilities - Breakdown by liability class according to the balance sheet in the published financial statements			
1	Customer accounts	1,589,481	1,589,481
2	Derivative financial liabilities	539	539
3	Unsettled transactions	35,173	35,173
4	Other liabilities	12,818	12,818
5	Accruals	9,160	9,160
6	Lease liabilities	17,076	17,076
7	Deferred tax liability	1,217	1,217
8	Provisions	1,949	1,949
Total liabilities		1,667,413	1,667,414
Shareholders' Equity			
1	Called up share capital	41,200	41,200 (a)
2	Retained earnings	109,264	109,264 (b)
3	Investment revaluation reserve	134	134 (b)
Total shareholders' equity		150,598	150,598

Main features of regulatory own funds instruments and eligible liabilities instruments

See CAB Payments Holdings Pillar 3 disclosures for details on the own funds instruments as this entity is listed on the London Stock exchange.

UK OV1 – Overview of risk weighted exposure amounts

The table below shows risk weighted assets and own funds requirements, which are calculated as 8% of RWAs.

£000s		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		31 Dec 2024	31 Dec 2023	31 Dec 2024
1	Credit risk (excluding CCR)	396,867	234,740	31,749
2	Of which the standardised approach	396,867	234,740	31,749
3	Of which the foundation IRB (FIRB) approach			
4	Of which slotting approach			
UK 4a	Of which equities under the simple risk weighted approach			
5	Of which the advanced IRB (AIRB) approach			
6	Counterparty credit risk - CCR	6,299	8,971	504
7	Of which the standardised approach	4,867	7,777	389
8	Of which internal model method (IMM)			
UK 8a	Of which exposures to a CCP			
UK 8b	Of which credit valuation adjustment - CVA	1,432	1,194	115
9	Of which other CCR			
20	Position, foreign exchange and commodities risks (Market risk)	3,577	3,299	286
21	Of which the standardised approach	3,577	3,299	286
22	Of which IMA			
UK 22a	Large exposures			
23	Operational risk	220,273	187,635	17,622
UK 23a	Of which basic indicator approach	220,273	187,635	17,622
UK 23b	Of which standardised approach			
UK 23c	Of which advanced measurement approach			
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)			
29	Total	627,016	434,645	50,161

Rows 15-19 have been removed as they are not applicable to the Bank.

RWAs have grown by £192m, partially due to a £162m increase in credit risk RWAs in 2024, driven by an increase in short term trade finance related lending to banks and an increase in other assets. Additionally, operational RWAs have increased by £33m following the recognition of 2024 revenue and the exclusion of the lower 2021 revenue from the basic indicator look back period.

Countercyclical capital buffers

The purpose of the CCyB is to counteract the effects of the economic cycle on banks' lending activities. The CCyB calculation applies percentages, which have been set by the central banks of each country (typically at least 12 months in advance), to the "Relevant Exposures" to entities within those countries. The calculation applies a weighted CCyB percentage to total risk weighted assets. Due to a greater proportion of assets in relevant CCyB geographies the Bank's blended CCyB rate has increased to 0.37% (31 December 2023: 0.20%).

CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

The table below shows the top 20 countries based on their exposure value and the corresponding CCyB requirement for eligible exposures.

		General credit exposures	Total exposure value	Own fund requirements		Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
		Exposure value under the standardised approach		Relevant credit risk exposures - Credit risk	Total			
£000s								
010	Breakdown by country:							
	United Kingdom	787,474	787,474	3,527	3,527	44,089	14.7%	2.0%
	United States	464,662	464,662	181	181	2,256	0.8%	0.0%
	Austria	82,402	82,402	0	0	0	0.0%	0.0%
	Ireland	78,298	78,298	637	637	7,957	2.7%	1.5%
	Germany	68,331	68,331	0	0	0	0.0%	0.8%
	France	48,383	48,383	0	0	0	0.0%	1.0%
	Nigeria	42,130	42,130	4,720	4,720	59,001	19.7%	0.0%
	Philippines	28,564	28,564	0	0	0	0.0%	0.0%
	Côte d'Ivoire	23,404	23,404	1,872	1,872	23,404	7.8%	0.0%
	Malawi	20,229	20,229	1,618	1,618	20,229	6.7%	0.0%
	Burkina Faso	19,243	19,243	2,309	2,309	28,864	9.6%	0.0%
	Canada	17,045	17,045	0	0	0	0.0%	0.0%
	Denmark	15,980	15,980	0	0	0	0.0%	2.5%
	Senegal	13,012	13,012	1,041	1,041	13,012	4.3%	0.0%
	Mozambique	11,280	11,280	902	902	11,280	3.8%	0.0%
	Paraguay	11,042	11,042	1,325	1,325	16,564	5.5%	0.0%
	Mongolia	9,584	9,584	767	767	9,584	3.2%	0.0%
	Benin	9,519	9,519	1,142	1,142	14,279	4.8%	0.0%
	Luxembourg	8,496	8,496	128	128	1,599	0.5%	0.5%
	Mauritius	7,464	7,464	597	597	7,464	2.5%	0.0%
	Other	51,801	51,801	3,236	3,236	40,452	13.5%	0.1%
020	Total	1,818,345	1,818,345	24,003	24,003	300,035	100.0%	

CCyB2 - Amount of institution-specific countercyclical capital buffer

The table below shows Bank's CCyB requirement relative to the Bank's overall RWAs.

£000s	31-Dec-24
1 Total risk exposure amount	627,016
2 Institution specific countercyclical capital buffer rate	0.37%
3 Institution specific countercyclical capital buffer requirement	2,320

Leverage

CRD requires firms to calculate a non-risk-based leverage ratio to supplement risk-based capital requirements. The leverage ratio measures the relationship between the Tier 1 capital resources of the organisation and its total assets. The purpose of monitoring and managing this metric is to enable firms and regulators to identify and mitigate the build-up of excessive leverage.

The minimum requirement for the leverage ratio is 3.25%. While the leverage ratio is not a regulatory requirement for Crown Agents Bank, it chooses to monitor the metric as part of its risk management framework.

The Bank monitors its leverage ratio daily, through its daily dashboard with the metric taken to ALCo monthly. The leverage ratio is also forecast and considered as part of CAB's financial planning exercise.

The calculation of the Leverage Ratio is as set out in the tables below which are based on the regulatory disclosure templates. All template rows other than those noted in the tables are either not applicable or nil.

UK LR1: Summary reconciliation of accounting assets and leverage ratio exposures

	£000s	Applicable amount
1	Total assets as per published financial statements	1,818,011
4	(Adjustment for exemption of exposures to central banks)	(122,052)
8	Adjustment for derivative financial instruments	16,341
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	7,907
12	Other adjustments	(24,333)
13	Total exposure measure	1,695,874

UK LR2: Leverage ratio common disclosure

	£000s	31/12/2024	31/12/2023
On-balance sheet exposures (excluding derivatives and Securities Finance Transactions ("SFTs"))			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	1,818,011	1,747,981
6	(Asset amounts deducted in determining tier 1 capital (leverage))	(24,333)	(18,847)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	1,793,678	1,729,134
Derivative exposures			
UK-9b	Exposure determined under the original exposure method	16,341	19,617
13	Total derivatives exposures	16,341	19,617
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	25,339	44,572
20	(Adjustments for conversion to credit equivalent amounts)	(17,432)	(41,132)
21	(General provisions deducted in determining tier 1 capital (leverage) and specific provisions associated with off-balance sheet exposures)		
22	Off-balance sheet exposures	7,907	3,440
Capital and total exposure measure			
23	Tier 1 capital (leverage)	126,265	115,358
24	Total exposure measure including claims on central banks	1,817,926	1,752,191
UK-24a	(-) Claims on central banks excluded	(122,052)	(168,087)
UK-24b	Total exposure measure excluding claims on central banks	1,695,874	1,584,105
Leverage ratio			
25	Leverage ratio excluding claims on central banks (%)	7.4%	7.3%
UK-25c	Leverage ratio including claims on central banks (%)	6.9%	6.6%

UK LR3: Leverage ratio split of on balance sheet exposures

	£000s	Leverage ratio exposures
UK-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	1,818,011
UK-3	Banking book exposures, of which:	1,818,011
UK-4	Covered Bonds	43,848
UK-5	Exposures treated as sovereigns	796,270
UK-7	Institutions	212,615
UK-10	Corporates	236,074
UK-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	529,203

Internal capital adequacy assessment process information ("ICAAP")

The Bank prepares an ICAAP on an annual basis which forms a key part of its capital risk management framework. The Bank uses the PRA's Supervisory Statement 31/15 and the PRA rulebook to ensure that its ICAAP is of a sufficient standard and that it meets the requirements of the PRA.

The key outputs of the ICAAP are an assessment of:

- The appropriateness of the Bank's capital risk appetite.
- What, if any, risks are not adequately captured under Pillar 1, and a quantification of the amount of capital that the Bank should hold to mitigate these risks.
- A series of severe yet plausible stress scenarios over the corporate planning horizon (currently 3 years), with the impact that such scenarios would have on the Bank's financial performance and impact on key capital metrics.
- What scenarios would have to come to fruition to challenge the viability of the Bank, the plausibility of these scenarios and what actions the Bank could take to mitigate their impacts.

Management across a variety of functions within the Bank are involved in the preparation of the ICAAP. The ICAAP is reviewed by ALCo, BRC and finally approved by the Board.

As a result of the Bank's most recent PRA SREP, the TCR of 12.37% was set in November 2022.

6. Credit Risk

Credit Risk is defined as the risk of financial loss arising from a borrower or counterparty's failure or inability to meet their financial obligations to the Bank in accordance with contractual terms. Through its financial service offerings, credit risk is created when Crown Agents Bank commits to, or enters an agreement with a borrower or counterparty.

The Bank has an active appetite for credit risk, and it selectively undertakes transactions that support business activity with approved counterparties based in well-known and understood markets, based on the credit risk profile, type of transaction, available risk mitigation, and geographic location of the counterparty.

The Bank's Credit Risk Management Policy ("CRMP") provides guidelines on instruments that can be used as credit risk mitigants, including cash collateral and guarantees, which must be unconditional and be payable on the Bank's first written demand. Additionally, guarantees must comply with the CRR rules (Part III, Title II, Chapter 4) to qualify for credit risk mitigation in respect of capital requirements. For derivative transactions, collateral is posted and received via standard International Swaps and Derivatives Association ("ISDA") agreements with Credit Support Annexes ("CSA").

The Bank adopted IFRS 9 with effect from 1 January 2022 as the standard for impairment of financial assets and evaluates its level of risk through consideration of the level of exposure that it assumes. Exposure is defined as the maximum loss that a financial institution might suffer if a borrower, counterparty, or group fails to meet their obligations or if assets and off-balance sheet positions (after offsets) must be realised. Mark-to-market exposures are carefully monitored in respect of forward FX transactions. The Bank's products linked to the provision of international banking and payment services are provided on a Pre-Funded or Payment versus Payment ("PvP") basis for higher risk counterparties in order to mitigate the risk of non-settlement.

Standardised Approach to Credit Risk RWA

Crown Agents Bank uses credit ratings provided by External Credit Assessment Institutions ("ECAIs") for all exposure types. These ratings are then mapped to the relevant credit quality step, which is used to determine the risk weight relating to credit risk. These risk weights are calculated using the credit ratings of the underlying issuer assets in the case of CIUs.

UK CR1 – Performing and non-performing exposures and related provisions

£000s		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures		Non-performing exposures		Performing exposures – accumulated impairment and provisions		Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		On performing exposures	On non-performing exposures					
		Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3							
005	Cash balances at central banks and other demand deposits	584,679	584,679													
010	Loans and advances	414,159	370,559	43,600	94	—	94	311	131	180	94		94	—		
020	Central banks	1	1													
030	General governments															
040	Credit institutions	351,941	340,346	11,595				131	125	5				—		
050	Other financial corporations	26,885	2,381	24,504	94		94	149	5	144	94		94			
060	Non-financial corporations	7,500	—					31	—							
070	Of which SMEs															
080	Households															
090	Debt securities	734,225	734,225					6	7							
100	Central banks															
110	General governments ¹	202,166	202,166					6	6							
120	Credit institutions ¹	479,483	479,483													
130	Other financial corporations															
140	Non-financial corporations															
150	Off-balance-sheet exposures	25,339	21,940					4	3					—		
160	Central banks	7,523	7,523											—		
170	General governments															
180	Credit institutions	17,816	14,417					4	3					—		
190	Other financial corporations	—	—													
200	Non-financial corporations															
210	Households															
220	Total	1,758,402	1,711,403	46,999	94	—	94	321	140	182	94	—	94	—	—	

UK CR1 – A – Maturity of Exposures

The table below shows a breakdown of net exposures of loans and advances and debt securities split by maturity.

		Net exposure value					Total
	£000s	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	
1	Loans and advances	184,687	179,029	—	—	42,663	406,378
2	Debt securities	—	113,744	132,284	—	—	246,028
3	Total	184,687	292,772	132,284	—	42,663	652,406

UK CR2 – Changes in the stock of non-performing loans and advances

	£000s	Gross carrying amount
010	Initial stock of non-performing loans and advances	95
020	Inflows to non-performing portfolios	
030	Outflows from non-performing portfolios	
040	Outflows due to write-offs	
050	Outflow due to loan repayment, partial or total	
110	Outflow due to other situations	(1)
060	Final stock of non-performing loans and advances	94

UK CR2-A - Changes in the stock of non-performing loans and advances and related net accumulated recoveries

	£000s	Gross carrying amount
010	Initial stock of non-performing loans and advances	95
020	Inflows to non-performing portfolios	
030	Outflows from non-performing portfolios	
040	Outflow to performing portfolio	
050	Outflow due to loan repayment, partial or total	
110	Outflow due to other situations	(1)
130	Final stock of non-performing loans and advances	94

UK CQ3 – Credit quality of performing and non-performing exposures by past due days

		Gross carrying amount/nominal amount									
		Performing exposures			Non-performing exposures						
£000s		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
5	Cash balances at central banks and other demand deposits	584,679	584,679								
10	Loans and advances	902,356	902,356	94							94
20	Central banks	1	1								
30	General governments	9,410	9,410								
40	Credit institutions	787,591	787,591								
50	Other financial corporations	97,854	97,854								
60	Non-financial corporations	7,500	7,500	94							94
90	Debt securities	246,028	246,028								
100	Central banks	—	—								
110	General governments	202,180	202,180								
120	Credit Institutions	43,848	43,848								
150	Off-balance-sheet exposures	25,339									
160	Central banks	7,523									
170	General governments	—									
180	Credit institutions	17,816									
190	Other financial corporations	—									
200	Non-financial corporations	—									
210	Households	—									
220	Total	1,758,402	1,733,063	—	94	—	—	—	—	—	94

Due to the short-term nature of the Bank's business, exposures are seldom past due for more than seven days. The Bank monitors unsettled transactions daily and these are usually regularised within a few days.

UK CQ4 – Quality of non-performing exposures by geography

£000s		Gross carrying/nominal amount			Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing		Of which subject to impairment			
			Of which defaulted				
10	On-balance-sheet exposures	1,733,063	94	94	1,733,063	(94)	
20	United Kingdom	720,420	94	94	720,420	(94)	
30	United States	461,786			461,786		
40	Austria	82,402			82,402		
50	Ireland	78,298			78,298		
60	Germany	66,690			66,690		
70	Other countries	323,466			323,466		
80	Off-balance-sheet exposures	25,339					4
90	Haiti	7,196					
100	Guyana	4,475					
110	Benin	2,783					1
120	Madagascar	1,636					
130	Belize	1,483					
140	Other countries	7,765					3
150	Total	1,758,402	94	94	1,733,063	(94)	4

UK CQ5 – Credit quality of loans and advances to non-financial corporations by industry

£000s		Gross carrying amount			Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which non-performing	Of which loans and advances subject to impairment		
			Of which defaulted			
110	Financial and insurance activities	27,073	94	94	26,979	(94)
200	Total	27,073	94	94	26,979	(94)

Note that all other categories have been omitted from the table as they do not apply to the Bank.

Credit Risk Mitigation

Credit risk is principally controlled by establishing and enforcing authorisation limits, including set-off limits, by checking the creditworthiness of counterparties and defining exposure levels to those counterparties. Daily monitoring of positions ensures that prudential limits are not exceeded. Crown Agents Bank continues to adopt a conservative credit policy.

The capital requirement relating to credit risk underlying certain exposures is mitigated by either:

- Collateral – cash placed with the Bank by the client.
- Guarantees – typically from institutions with very high credit ratings (e.g. World Bank).

Regular stress testing considers the likelihood of the failure of a market counterparty and credit concentrations.

Wrong Way Risk

Wrong way risk arises when the likelihood of default is positively correlated with the market risk factors (General Wrong Way Risk), whereas specific wrong way risk is where exposures are positively correlated with the probability of default. The Bank's use of CSAs largely mitigates wrong way risk on its derivatives. Crown Agents Bank does not consider Wrong Way Risk to be a material risk to the business.

Collateral

Crown Agents Bank receives and posts collateral in the form of cash relating to unrealised gains/losses on derivatives. The key features of the collateral that the Bank receives is as follows:

- It has the right to retain the collateral in the event of default from the counterparty.
- The value of collateral remains stable (cash in highly liquid, established currencies).
- The collateral agreements are legally enforceable.

CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

The table below shows a breakdown of on-balance sheet credit risk exposures secured by different Credit Risk Mitigation ("CRM") techniques.

	Unsecured carrying amount	Secured carrying amount		Of which secured by collateral	Of which secured by financial guarantees		Of which secured by credit derivatives
£000s							
1 Loans and advances	406,378	—		—			
2 Debt securities	246,028						
3 Total	652,406	—		—	—	—	—
4 <i>Of which non-performing exposures</i>	94						
5 <i>Of which defaulted</i>	94						

CR4 – Standardised approach – Credit risk exposure and CRM effects

The table below shows the impact of pre and post credit conversion factors and credit risk mitigation techniques on exposures by asset class.

£000s	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
Exposure classes	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density (%)
Central governments or central banks	701,818	7,523	701,818	1,505	1,530	0.2%
Regional government or local authorities	—	—	—	—	—	
Public sector entities	22,930	—	22,930	—	—	0.0%
Multilateral development banks	71,521	—	71,521	—	—	0.0%
International organisations	—	—	—	—	—	
Institutions	228,930	124	228,930	25	41,680	18.2%
Corporates	236,007	17,692	236,007	6,377	283,249	116.9%
Retail	—	—	—	—	—	
Secured by mortgages on immovable property	—	—	—	—	—	
Exposures in default	94	—	94	—	—	
Exposures associated with particularly high risk	—	—	—	—	—	
Covered bonds	—	—	—	—	—	
Institutions and corporates with a short-term credit assessment	—	—	—	—	—	
Collective investment undertakings	488,197	—	488,197	—	11,485	2.4%
Equity	2,452	—	2,452	—	5,302	216.2%
Other items	58,489	—	58,489	—	58,489	100.0%
TOTAL	1,810,439	25,339	1,810,439	7,907	401,734	22.1%

CR5 – Standardised approach

The table below shows a breakdown of exposures post-CCF and post-CRM:

£000s	Risk weight								Total	Of which unrated
Exposure classes	0%	10%	20%	50%	100%	150%	250%	Others		
Central governments or central banks	701,793	—	—	—	7,548	—	—	—	709,341	7,524
Regional government or local authorities	—	—	—	—	—	—	—	—	—	—
Public sector entities	22,930	—	—	—	—	—	—	—	22,930	—
Multilateral development banks	71,521	—	—	—	—	—	—	—	71,521	—
International organisations	—	—	—	—	—	—	—	—	—	—
Institutions	—	43,848	184,292	914	—	—	—	—	229,054	8,812
Corporates	—	—	1,636	—	165,584	86,572	—	—	253,793	166,000
Exposures in default	—	—	—	—	—	—	—	—	94	—
Units or shares in collective investment undertakings	—	—	45,814	—	—	—	—	442,383	488,197	—
Equity exposures	—	—	—	—	553	—	1,899	—	2,452	—
Other items	—	—	—	—	58,489	—	—	—	58,489	—
TOTAL	796,245	43,848	231,742	914	232,174	86,572	1,899	442,383	1,835,871	182,336

CCR1 – Analysis of CCR exposure by approach

£000s	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
UK1 Original Exposure Method (for derivatives)	4,697	9,642		1.4	16,341	16,341	16,341	3,435
UK2 Simplified SA-CCR (for derivatives)								
4 Financial collateral comprehensive method (for SFTs)								
5 VaR for SFTs								
6 Total					16,341	16,341	16,341	3,435

CCR2 - Transactions subject to own funds requirements for CVA risk

£000s	Exposure value	RWEA
1 Total transactions subject to the Advanced method		
2 (i) VaR component (including the 3× multiplier)		
3 (ii) stressed VaR component (including the 3× multiplier)		
4 Transactions subject to the Standardised method	16,341	1,432
UK4 Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5 Total transactions subject to own funds requirements for CVA risk	16,341	1,432

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

£000s	Risk weight											Total exposure value
Exposure classes	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
Institutions	—	—	—	—	15,831	484	—	—	—	—		16,314
Corporates	—	—	—	—	—	—	—	—	26	—		26
Total exposure value	—	—	—	—	15,831	484	—	—	26	—	—	16,341

7. Operational Risk

Operational risk is defined as the risk of loss or other non-financial impact, resulting from inadequate or failed internal processes, people, and systems, or from external events. It arises from day-to day operations and is relevant to every aspect of the Bank. These include risks arising from failing to properly manage outsourced, non-outsourced and third-party relationships and cyber security.

The Operational Risk Management Policy sets out how operational risk is managed and reviewed at least once per calendar year. It covers the operational lifecycle, including risk management tools, roles and responsibilities, ownership, and governance. The Policy is supported by procedures and standards that detail specific risk tools such as incident management, risk and control self-assessments ("RCSA") etc.

Controls & Mitigation

Crown Agents Bank uses various tools to identify, assess, mitigate, manage, and report operational risk, and relies on a centralised risk system to record operational incidents, loss data, risk and control self-assessments, assurance findings and actions etc., in a consistent way that is aligned to the ERMF. Regardless of value, all operational incidents are recorded by the business, and reviewed by the 2nd Line of Defence operational risk team, who may recommend additional controls and procedures where appropriate.

The operational risk capital requirement for Crown Agents Bank under Pillar 1 is calculated using the Basic Indicator Approach ("BIA"), whereby a 15% multiplier is applied to the average net relevant indicator over a rolling three-year period. In the Bank's case, the relevant indicator is Crown Agents Bank's revenue. The RWA calculated under this approach is as follows:

UK OR1 – Operational risk own funds requirements and risk weighted exposure amounts

£000s	Banking activities	Relevant indicator			Own funds requirements	Risk weighted exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)	109,388	137,424	105,624	17,622	220,273

The ORC meets regularly to discuss operational issues. It has responsibility for monitoring all the key operational risks facing the organisation. The ORC escalates matters to the ERC as required.

As part of the RCSA activity key controls have been identified by the business that are stored centrally in the Bank's risk system.

The Bank's operational risk framework is appropriately designed, embedded within key roles and responsibilities across the Board, the executive, the business, the risk function and the audit/assurance function.

Measurements of Operational Risk

The Bank aims to maintain robust operational systems and controls and seeks to operate within a defined level of operational risk. The operational risk appetite considers risk events, the assessment of internal controls as well as holding additional capital for certain operational risks.

Through the establishment of, and investment in, sound systems, controls and audit functions, Crown Agents Bank aims to minimise operational failures. The Bank has placed emphasis on ensuring that the IT infrastructure, performance, resilience, and security meet the on-going needs of the business.

8. Liquidity & Funding Risk

Liquidity risk reflects the risk that the Bank cannot meet its contractual or contingent obligations in a timely manner as they fall due. Funding risk is the risk that the Bank cannot maintain access to a sufficient stable funding base to maintain its liquidity.

Crown Agents Bank's risk appetite is to ensure that it holds adequate liquidity, both in terms of quality and quantity to meet regulatory and internal requirements such that there is no reasonably foreseeable risk that its liabilities cannot be met as they fall due, whether in business-as-usual or in a stress.

The Bank is transaction led and does not borrow to finance significant lending. A substantial proportion of customer accounts are easy access accounts that, although repayable on demand, have historically formed a stable deposit base.

Deposit outflow risk is the primary liquidity risk driver for the Bank, and could occur if there was a concern by depositors over the current or future creditworthiness of the Bank. Although Crown Agents Bank seeks to operate in such a way as to protect depositors, an extremely low proportion of deposits are currently protected by the government's Financial Services Compensation Scheme ("FSCS") due to the nature of its deposits. The FSCS currently provides £85,000 of protection to eligible depositors.

Controls and Mitigation

Liquidity risk can arise because:

- The Bank has insufficient funds to pay the amounts that it owes (either to depositors or creditors).
- The Bank has sufficient funds, but they are not readily accessible.

The Bank calculates its minimum liquidity requirement as the higher of the regulatory requirement and its own internal assessment and then holds a significant liquidity buffer above this to ensure it is suitably protected against liquidity risks. The Bank manages and monitors liquidity risk on a daily basis and ensures that liquidity is sufficient to cover cash flow obligations, fluctuations in funding and to support anticipated asset growth. Liquidity and funding forms standing items for discussion at ALCo with the Executive Risk Committee and Board Risk committee maintaining oversight. Any liquidity and funding issues are escalated as required to ALCo and then onwards to ERC and BRC respectively.

Liquidity risk is specifically assessed through the CAB ILAAP. As part of this process, the Bank assesses the level of liquidity necessary to prudently cover systemic and idiosyncratic risks specific to its business model.

The Bank manages its liquidity position on a day-to-day basis to ensure compliance with both internal risk appetite and the regulatory minimum requirement. Liquidity is measured and monitored daily based on metrics and limits set out within the RAS & TL and assessed by ALCo in its monthly meetings.

Based on the business model of funding primarily through wholesale deposits, the Board has set a liquidity risk appetite which it considers to be appropriate to provide it with the assurance that the relevant liquidity risk drivers should be considered and appropriately stressed and that the Bank is able to meet liabilities beyond the targeted survival period.

The Bank holds a large proportion of its assets in the form of HQLA (71% as at 31 December 2024), which primarily consists of its reserve account with the Bank of England, and the holding of Level 1 Government/ Government backed bonds in addition to investments into CIUs, which invest in US Treasuries. The breakdown of the HQLA can be found in the HQLA breakdown table below.

Liquidity Contingency Plan

In line with its regulatory requirements, the Bank maintains a Liquidity Contingency Plan ("LCP") as part of the recovery plan. The LCP forms part of the Banks' Recovery Plan ("RP") and is designed to identify emerging liquidity concerns at an early stage, so that mitigating actions can be taken to avoid a more serious crisis developing. The LCP, involves a two-stage process, covering preventative measures and corrective measures to be invoked when there is a potential or actual risk to the Bank's overall liquidity position. The LCP provides a plan for managing a liquidity situation or crisis caused by internal events, external events, or a combination thereof. The LCP outlines what actions are available to ensure it complies with the liquidity adequacy rules and operates within its risk appetite and limits.

HQLA Breakdown¹

£000s	31-Dec-24	30-Jun-24	31-Dec-23
Bank of England Reserves (subject to article 8)	576,667	491,565	524,387
L1 HQLA Bonds	245,961	316,271	352,795
L1 CIUs (value according to Article 9)	441,942	294,707	361,766
Total HQLA	1,264,570	1,102,543	1,238,949

(1) Spot values are used as opposed to the averages throughout the year.

The increase in CIUs, was due to a combination of growth in deposit balances in 2024 and a large deposit that was placed with the Bank over year end. The subsequent cash from these deposits was placed on the CIU fund.

Liquidity & Funding Ratios

The Bank manages its liquidity position with regards to its internal risk appetite, the LCR and NSFR as required by the PRA.

Liquidity Coverage Ratio ("LCR")

The LCR is a combined 30-day stress metric which ensures banks hold sufficient HQLA to cover a cumulative stressed net outflows over a 30-day period.

The Bank's deposit balances are predominantly placed by central banks, commercial banks, governments and government agency clients. A large proportion of these balances relate to correspondent/commercial banking relationships as part of Bank's offering for payment and FX solutions. The LCR regulatory treatment is to assign a 100% outflow factor to these deposits as they are financial customers.

Central Banks and Government clients fund their international operations through their accounts with the Bank with periodic, relatively low volumes of transactions compared to the commercial banks. They are assigned 40% outflow factor other than those maintained for clearing, custody and cash management purpose i.e. operational balances which are weighted at 25%.

Based on these rules, the LCR as of 31 December 2024 is 136% (2023: 143%) which is significantly in excess of the minimum requirements of 100%.

UK LIQ1 – Quantitative Information of LCR

The following template provides a breakdown of the average LCR for CAB during 2024.

£m		Total unweighted value (average)				Total weighted value (average)			
UK 1a	Quarter ending on	31 Dec 2024	30 Sept 2024	30 Jun 2024	31 Mar 2024	31 Dec 2024	30 Sept 2024	30 Jun 2024	31 Mar 2024
UK 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
High-Quality Liquid Assets									
1	Total high-quality liquid assets (HQLA)					1,111	1,094	1,076	1,091
Cash - Outflows									
5	Unsecured wholesale funding	1,261	1,217	1,184	1,143	958	916	893	863
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	81	93	107	113	20	23	27	28
7	Non-operational deposits (all counterparties)	1,180	1,124	1,077	1,030	938	893	866	835
10	Additional requirements	31	31	31	31	31	33	33	32
11	Outflows related to derivative exposures and other collateral requirements	29	31	31	31	29	31	31	31
13	Credit and liquidity facilities	59	64	65	68	2	2	3	3
14	Other contractual funding obligations	8	7	6	5	—	—	—	—
16	TOTAL CASH OUTFLOWS					989	950	927	897
Cash - Inflows									
18	Inflows from fully performing exposures	166	159	148	131	161	153	144	127
19	Other cash inflows	13	11	7	10	13	11	7	10
20	TOTAL CASH INFLOWS	180	170	155	141	175	164	151	137
UK-20c	Inflows subject to 75% cap	180	170	155	141	175	164	151	137
Total Adjusted Value									
UK-21	LIQUIDITY BUFFER					1,111	1,094	1,076	1,091
22	TOTAL NET CASH OUTFLOWS					815	786	776	760
23	LIQUIDITY COVERAGE RATIO %					136.5%	139.4%	138.8%	144.0%

Net Stable Funding Ratio ("NSFR")

The NSFR came into force as a regulatory requirement with effect from 1 January 2022.

Other than capital, the Bank's main sources of stable funding is operational deposits from its non-financial customers and fixed term deposits maturing >6 months up to 1 year, both these balances are weighted at a 50% ASF factor.

The Bank's main funding requirements come from loans to financial counterparties maturing within 6 months and 12 months requiring 10% and 50% stable funding respectively and other non-financial balance sheet assets requiring either 50% or 100% stable funding depending on maturity.

UK LIQ2 – Net Stable Funding Ratio (NSFR)

£000s		Unweighted value by residual maturity (average)				Weighted value (average)
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	140,333	—	—	—	140,333
2	Own funds	140,333				140,333
7	Wholesale funding:		1,435,287	21,814	2,884	69,700
8	Operational deposits		78,117			39,059
9	Other wholesale funding		1,357,170	21,814	2,884	30,641
11	Other liabilities:	1,690	246,771	—	1,277	958
12	NSFR derivative liabilities	1,690				
13	All other liabilities and capital instruments not included in the above categories		246,771	—	1,277	958
14	Total available stable funding (ASF)					210,991
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					17,059
17	Performing loans and securities:		378,337	4,124	2,128	72,928
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		4,380	—	—	2,190
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		373,957	4,124	2,128	70,738
26	Other assets:		226,822	—	55,340	69,099
27	Physical traded commodities					
30	NSFR derivative liabilities before deduction of variation margin posted					84
31	All other assets not included in the above categories		226,822	—	55,340	69,099
32	Off-balance sheet items		25,389	10,612	398	2,085
33	Total RSF					161,171
34	Net Stable Funding Ratio (%)					130.9%

9. Market Risk

Market risk is the risk of losses resulting from adverse value movements of the Bank's assets and liabilities. Crown Agents Bank is exposed to market risk via Interest Rate Risk in the Banking Book ("IRRBB") and Foreign Exchange ("FX") Risk.

The Bank has a highly restricted appetite for incurring market risk. It does not operate a trading book - all assets are held in the banking book with the intention to hold to maturity. The Bank's risk appetite is to ensure that, under severe changes in interest rates or currency FX rates, any capital or earnings at risk remain within pre-approved limits and for which capital is held.

Foreign Exchange Risk

FX risk is risk to earnings or capital arising from adverse movements in currency FX rates. The Bank does not operate a trading book and all FX risk relates to client trade related flows.

UK MR1 – Market Risk under the Standardised Approach

£000s	RWEAs
Outright products	
Interest rate risk (general and specific)	
Equity risk (general and specific)	
Foreign exchange risk	3,577
Commodity risk	
Total	3,577

Control & Mitigation

The Bank's tolerance of its FX risk is constructed and set out in its RAS & TL. FX exposure is controlled through the tight limiting of open FX positions through a tiered approval framework which is ultimately restricted by Board approved limits both in aggregate and on a currency basis. Utilisation against these limits is measured and reported daily with oversight from 1st and 2nd line and is reviewed monthly as a standing item at ALCo with ERC and BRC maintaining additional oversight.

CAB maintains risk management systems to identify, measure, monitor, and control market risk including the daily distribution of spot and forward FX and other positions, as well as the resultant calculation of the relevant capital requirement.

10. Interest Rate Risk

Monitoring and Control

Interest Rate Risk in the Banking Book ("IRRBB") is defined as the risk to earnings or economic capital arising from movements in interest rates that affect banking book positions.

The Board manages IRRBB risk through its primary entity, CAB, and sets its IRRBB Risk appetite. The IRRBB risk appetite metrics are reported as a standing item at ALCo with ERC and BRC maintaining additional oversight. ALCo has day to day responsibility for management of IRRBB and recommending to the Board any changes in risk appetite or hedging strategies.

IRRBB1: Quantitative information on IRRBB

The table below articulates Bank's exposure to movements in interest rates under the prescribed scenarios described in 9.7 of the ICAA part of the PRA Rulebook.

£000s	ΔEVE		ΔNII		Tier 1 capital	
	31-Dec-24	31-Dec-23	31-Dec-24	31-Dec-23	31-Dec-24	31-Dec-23
Parallel shock up	(5,900)	(4,372)	8,795	10,194		
Parallel shock down	2,637	4,613	(8,795)	(10,194)		
Steeper shock	1,140	2,071				
Flattener shock	(3,986)	(2,819)				
Short rates shock up	(5,540)	(3,985)				
Short rates shock down	5,409	4,154				
Maximum	(5,900)	(4,372)	(8,795)	(10,194)		
Tier 1 capital					126,265	115,358

Key modelling and parametric assumptions used in calculating change in EVE and change in net interest income in UK IRRBB1

Key modelling assumptions used in order to prepare the sensitivities disclosed in the IRRBB1 template are set out below:

Economic Value of Equity ("EVE") Sensitivity

- A run off balance sheet with assets and liabilities assumed to be replaced on a like for like basis at maturity.
- Equity is not included.
- Non maturing deposits ("NMDs") are assumed to mature overnight in line with their contractual terms.
- PRA prescribed interest rate shocks applied instantaneously to the prevailing yield curve as at 31 December 2024.

NII sensitivity

Identical modelling assumptions as above except for that equity is included.

- Equity is included on an internally agreed investment term.
- Static balance sheet basis - in particular, non maturing deposits assumed to remain for the full 12 month duration of the scenario.

Metrics and modelling assumptions used in internal IRRBB management

The Bank has an intrinsically low IRRBB risk appetite, measured by:

- the impact on Net Interest Income over 12 months arising from a 100bps parallel rate shift.
- the Economic Value ("EV") impact of a 200bps parallel rate shift.

The above metrics are calculated and reported monthly.

Where different from the metrics disclosed under IRRBB1, key modelling assumptions used in calculating the internal EV and NII sensitivities are listed below.

EV Sensitivity

The Bank's EV sensitivity calculation is based on that prescribed by the PRA and reported to it on a quarterly basis via the FSA017 regulatory return.

The following repricing buckets are applied (longer duration buckets are not relevant as the Bank does not have any assets or liabilities which reprice or mature in more than 3 years):

- 0 - 3 months
- 3 - 6 months
- 6 - 12 months
- 1 - 2 years
- 2 - 3 years

Equity is included in the repricing gap and assumed to reprice based on an internally agreed investment term.

Based on these repricing buckets a + / - 200bp instantaneous shock to prevailing yield curve is applied as at the reporting date.

Average repricing maturity assigned to NMDs

For the calculation of the EV metric it is assumed that all NMDs mature overnight in line with their contractual term; however this assumption is under review via the ALCO.

Overview of IRRBB Risk Management and mitigation strategies

Due to the nature of the products offered by the Bank, its balance sheet is simple from an IRRBB perspective. The most significant component of interest rate risk to which the Bank is exposed is Repricing Risk (the risk to earnings due to assets and liabilities repricing at different times).

The Bank has only very limited basis risk as all its liabilities are either fixed or administered rate thereby not creating any basis exposure. Furthermore, Crown Agents Bank does not offer any products which have any embedded optionality in terms of early repayment.

The Bank manages and mitigates IRRBB by regularly preparing repricing gap reports. To the extent that significant gaps are identified, the Bank will purchase bonds or raise additional deposits of the appropriate duration to mitigate the risk. Crown Agents Banks' bond portfolio and deposit books are all accounted for on an amortised cost basis. Further metrics are monitored to mitigate the risk that a material accounting loss is suffered in the event of having to dispose of the Banks' bond holdings.

Other market Risks

The Bank holds certain assets, notably its investments in CIUs, for which an active market exists, and which are therefore potentially subject to market risk. The assets held by the CIUs in which the Bank invests are extremely high quality and very short duration debt instruments meaning that the market risk associated with these is not significant. As of 31 December 2024, the CIU portfolio amounted £518,764k (£209,486k in 2023).

Crown Agents Bank does not carry out any proprietary trading activity.

11. Remuneration

The PRA has defined certain requirements relating to remuneration, referred to as the Remuneration Code (the “Code”). Firms that fall within the scope of the Code (which includes banks) must establish, implement and maintain remuneration policies, procedures and practices that are consistent with and promote sound and effective risk management. Policies and procedures must be comprehensive and proportionate to the nature, scale and complexity of the firm’s activities.

A firm must maintain a record of its Code Staff (being those staff whose professional activities have a material impact on the firm’s risk profile) and take reasonable steps to ensure Code Staff understand the implications of their status.

The disclosure requirements of Pillar 3 are defined by CRR Article 450. Data is provided for remuneration received by Code Staff for the year ended 31 December 2024.

During the year, the Bank designated a total of 30 individuals (including Non-Executive Directors) who were classed as Code Staff. Of these, 21 were categorised as Senior Management (being the Executive and Non-Executive Directors who served during the year, and members of the Executive Committee), as well as 9 individuals categorised as Other Code Staff.

Approach to Remuneration

The Bank’s remuneration policies are designed to comply with the Code and it is committed to adherence to its practices and guidelines in respect of Code Staff.

The key principles behind the Bank’s remuneration policy are those that it believes are critical to the business and reflect its values and recognise the need to be competitive. The policy is to set remuneration levels which are aligned within the overall Bank stated risk appetite and ICAAP measures, and to ensure that the Executive Directors, Senior Management, and employees are fairly and responsibly rewarded in return for high levels of individual and business performance.

The overall aim of the policy is to attract, motivate and retain Executives of high calibre who can deliver sustained performance consistent with strategic goals, appropriate risk management and to reward them for enhancing value.

The following key principles underpin these themes:

- Remuneration will not be excessive – staffing retention budgeted by setting remuneration appropriately through regular compensation benchmarking against independent third-party data.
- Remuneration is aligned to the success of the Bank – performance related components of remuneration are aligned to the Bank’s longer-term business planning, including operational budget, risk adjusted financial measures aligned to its core strategy.
- Proportion of variable pay is appropriate, predominantly cash based and may be deferred – where a significant proportion of remuneration is variable, it will be designed to reward longer term success. The ratio of fixed to variable remuneration will differ depending on the specific incentive schemes in operation across the business, however as a general rule the Bank seeks to ensure that the majority of an individual’s remuneration is fixed.
- No reward for poor performance - the performance management framework focuses on objective measurement of outputs along with behavioural measures which assess the way in which work is done.
- Attract and retain high calibre individuals – employee turnover will be monitored for the proportion attributable to remuneration policy and practices; the performance management framework will be maintained to ensure it continues to reflect and support business goals; assessment of the value of roles will be through an objective measurable methodology, that ensures value is attached to tangible services and outputs of the role.

Decision-making Process for Determining Remuneration Policy

In line with regulatory guidance, remuneration is overseen by the Remco, a Board sub-committee.

The Remco assists the Board in relation to Directors' remuneration including making recommendations to the Board on the Bank's policy on executive remuneration, setting the overarching principles, parameters and governance framework of the remuneration policy and determining the individual remuneration and benefits package of each of its Executive Directors, senior managers and the Company Secretary.

The Committee was established shortly before the Group's Admission to the London Stock Exchange in July 2023. Prior to Admission, the Company had a different remuneration committee, which was composed of Non-executive Directors of the pre-IPO business.

The Remco comprises Noël Harwerth (Chair), Caroline Brown and Susanne Chishti, all of whom are independent Non-executive Directors and Ann Cairns, the Chair of the Board. Mario Shiliashki stepped down from the Committee effective 3 September 2024. Susanne Chishti joined the Committee effective 4 November 2024. The full terms of reference of the Committee are available on CAB Payments' corporate website at <https://cabpayments.com/investors>.

In summary, the Remco's responsibilities are as follows:

- To develop the policy on executive remuneration and monitor its ongoing appropriateness and effectiveness.
- To determine the levels of remuneration for the Executive Directors, senior management and the Chair of the Board (ensuring that no individual is involved in any decisions relating to their own remuneration outcome).
- Oversee the remuneration policies and practices of the Bank's wider workforce and ensure that its policy for the senior team is consistently structured.
- Ensure that any applicable regulations, whether connected to our status as a regulated bank or as a listed company more generally are followed proportionately.
- Oversee the operation of the Bank's share schemes.

The Remco met six times in the 2024 financial year.

The Remco receives independent advice from external remuneration consultants Korn Ferry, who were appointed in December 2022 following a tender process. During the year under review, the Remco received advice on the implementation of the new Policy, its operation in 2024 and application for 2025 and the drafting of this report. Korn Ferry is a signatory to the Remuneration Consultants' Code of Conduct and has confirmed to the Remco that it adheres in all respects to the terms of the Code of

Conduct. Korn Ferry provided no other advice or services to the Bank during the year and has no connection with any individual Director.

Remuneration Policy for Code Staff¹

The objective of the remuneration policy is to ensure that appropriate incentives are awarded for individual contributions to the success of the Bank and encourage enhanced performance. The policy in relation to the various elements of remuneration structures for Executive Directors and other Code Staff is set out below.

Basic Salary

The basic salary of the Executive Directors and other members of the senior leadership team (as for all employees) is determined by taking into account the responsibilities and experience of the individual directors and having regard to relevant market comparisons. Progression is reflected through the annual salary and employee performance appraisal review processes.

Variable Pay

The Executive Directors and other Code Staff (as for all employees) participate in a non-pensionable performance incentive scheme, the metrics of which reflect the Bank's key objectives. These elements are all set to provide challenging objectives, giving the Executive Directors and all staff an incentive to perform at the highest level.

Benefits

Each Executive Director is provided with benefits which comprise pension arrangements, private medical insurance, critical illness cover, life assurance and income protection insurance. Other Code Staff are entitled to similar benefits.

Link Between Pay and Performance

Performance-based remuneration is awarded by the Remco in a manner which promotes sound risk management (within the Bank's stated risk appetite and ICAAP measures) and does not induce excessive risk-taking.

The Bank's remuneration policy focuses on ensuring sound and effective risk management through:

- A governance structure for setting goals and communicating these to employees.
- Making all variable remuneration awards at the discretion of the Remco and subject to individual, business unit, overall Bank performance, stated risk appetite and ICAAP measures.

In practice all remuneration decisions are approved by the CEO and Human Resources before implementation and as part of this would also be reviewed from a risk perspective. The remuneration decisions for Executive Directors and other Code Staff are reviewed and approved by the Remco.

Design and Structure of Remuneration

There are three main elements of remuneration available to Code Staff:

¹ The Remuneration Policy does not apply to non-executive directors who are paid a fixed fee which is reviewed periodically by the Remuneration Committee

- Basic salary.
- Variable awards (regarding the performance incentive scheme).
- Benefits.

Additionally, certain Code staff are also part of the Crown Agents Bank Long-Term Incentive Plan ("LTIP").

All the current Executive Directors have entered into contracts that can be terminated after the relevant notice period has been served, or by payment by Bank of an amount equivalent to the remuneration payable during such notice period. Service contracts for other Code Staff have notice periods which vary depending on the role.

Non-Executive Directors are appointed by letter for an initial term of three years after which their continued appointment will be reviewed annually and may be extended. Non-Executive Directors are not eligible for variable compensation.

The variable incentive scheme is operated in a manner which promotes sound risk management (within the Bank's stated risk appetite and ICAAP measures) and does not induce excessive risk-taking. This is done by ensuring:

- An appropriate balance between fixed and performance-based components.
- Awards are made by assessing both individual performance against KPIs and underlying Bank performance (using an appropriate combination of financial & non-financial metrics).
- Individuals' performance within control functions are assessed against the achievement of objectives linked to their functions which are independent of the financial performance of the business area that the individual controls.
- The outcomes are also moderated by the extent to which personal objectives had been achieved and based on any input from the ExCo with regards to any adjustments required for risk
- The awarding of performance-based remuneration for Executive Directors and other Code Staff is at the full discretion of the Remco.

Salary and Fees

All Code Staff, other than Non-Executive Directors, receive a basic salary that reflects the risks and responsibilities attached to each specific role. Salaries are reviewed by the Remco on an annual basis with consideration given to external market data for similar roles in the financial services sector. Other factors considered by the Remco include the individual's skills, experience, performance and behaviour.

Non-Executive Directors receive fees for their services. Fees are reviewed and approved by the Remco on an annual basis with consideration given to the level of fees at comparable organisations.

Variable Awards

Bank makes one type of variable award scheme available to Code Staff – a performance incentive scheme. Non-executive directors are not eligible for variable compensation.

When considering the performance of the Bank and participants, the Remco will assess progress against a number of key financial and operational drivers including:

- Profit before tax.
- Return on assets / return on equity.
- Cost/income ratio.
- Stated risk appetite.
- ICAAP measures.
- Progress in the Bank's focus areas.
- Compliance with internal business procedures.
- Customer outcomes.

The performance of individuals within control functions is assessed independently of the financial performance of the business area that the individual controls. This is overseen by the Remco with input from the BRC, where necessary.

These measures were all set to provide challenging objectives that are aligned with the Bank's strategy, giving the Executive Directors an incentive to perform at the highest level. The financial outcomes were also moderated by the extent to which personal objectives had been achieved.

Where individual KPIs are achieved but the underlying performance of the Bank is unsatisfactory, annual performance-based payments may be reduced in part or withheld altogether at the Remco's discretion.

Payment of performance-based remuneration will be subject to any deferral requirements as required by the Remco at their discretion.

Remuneration Paid to Code Staff

The following tables summarise the 2024 remuneration for the Bank's Executive Directors, Non-Executive Directors, Senior Management (as designated as Senior Management under the Financial Conduct Authority's ("FCA's") Senior Management regime) and staff whose professional activities have a material impact on the risk profile of the company (together, Code Staff).

REM1: Remuneration awarded for the financial year

The table below summarises the remuneration awarded for FY'2024

	£000s		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Fixed remuneration	1	Number of identified staff	8	13	1	8
	2	Total fixed remuneration	908	3,518	219	1,380
	3	Of which: cash-based	908	3,324	204	1,254
	4	(Not applicable in the UK)				
	6	(Not applicable in the UK)				
	7	Of which: other forms	0	194	15	126
	8	(Not applicable in the UK)				
	17	Total remuneration (2 + 10)	908	7,985	433	1,855
Variable remuneration	9	Number of identified staff	8	13	1	8
	10	Total variable remuneration	0	4,467	214	475
	11	Of which: cash-based	0	541	90	202
	12	Of which: deferred	0	0	0	0
	UK-13a	Of which: shares or equivalent ownership interests	0	3,926	124	273
	UK-14a	Of which: deferred	0	3,926	124	273

REM4: Remuneration of EUR 1 million or more per year

The table below summarises the remuneration of Code Staff of EUR 1 million or more in 2024:

	EUR	2024 Identified Staff that are high earners as set out in Article 450(1)(i) CRR Number of employees
1	1,000,000 to below 1,500,000	2
2	1,500,000 to below 2,000,000	1

No sign-on payments were paid to Code Staff. Similarly, no compensation was payable to Code Staff.

The variable remuneration includes a share-based taxable benefit received by Senior Management (the LTIP) and by Other Code Staff.

All other remuneration is paid in cash apart from sundry staff benefits (such as medical insurance and pension contributions) which is included within the fixed remuneration figures.

The LTIP element of the remuneration is deferred.

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

The following table provides a summary of remuneration of the Bank's material risk takers.

£000s		Management body remuneration			Business areas	Total
		MB Supervisory function	MB Management function	Total MB	All other	
1	Total number of identified staff					30
2	Of which: members of the MB	8	13	21		
3	Of which: other senior management				1	
4	Of which: other identified staff				8	
5	Total remuneration of identified staff	908	7,985	8,894	2,287	
6	Of which: variable remuneration		4,467	4,467	689	
7	Of which: fixed remuneration	836	3,518	4,427	1,599	

12. Asset Encumbrance

An asset is classified as encumbered if it is pledged or used as security to collateralise a specific transaction, such that it cannot be freely withdrawn.

The Bank's only source of encumbrance is in the form of derivatives, where cash is pledged to its derivative counterparties to collateralise out of the money derivative positions. Collateral is typically pledged in GBP, USD and EUR cash.

The Bank's encumbered assets as at 31 December 2024 were £0.4m (2023 £8.3m), with the table below showing the median values over the 4 quarters in 2024.

£000s	Carrying amount of encumbered assets	Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	of which notionally eligible EHQLA and HQLA	of which EHQLA and HQLA		of which EHQLA and HQLA	
Assets of the reporting institution	260				
Equity instruments		2,457			
Debt securities		293,208	293,208	293,119	293,119
of which: covered bonds		43,295	43,295	43,389	43,389
of which: securitisations					
of which: issued by general governments		133,255	133,255	133,203	133,203
of which: issued by financial corporations		126,352	126,352	125,956	125,956
Other assets		1,297,143	783,853		

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