CLARIEN

Clarien Bank Limited

Interim Pillar 3 Disclosures

March 31st, 2025

Table of Contents

1. CAUTIONARY STATEMENTS REGARDING FORWARD-LOOKING STATEMENTS 1

2. INTRODUCTION 2

2.1 Regulatory Framework for Disclosures 2

2.2 Basis of Disclosure 3

2.3 Scope of Application 3

2.4 Media and Location 3

3. RISK MANAGEMENT OBJECTIVES AND POLICIES 4

3.1 Risk Management Framework 4

3.2 Risk Culture 4

3.3 Risk Governance 5

3.4 Risk Appetite 7

3.5 Risk and Control Management 7

3.6 Stress Testing 8

4. KEY PRUDENTIAL METRICS 9

5. CAPITAL RESOURCES 10

5.1 Total Common Equity Tier 1 Capital 10

5.2 Tier 2 Capital 10

5.3 Leverage Ratio 13

6. CAPITAL ADEQUACY 14

6.1 Overview 14

6.2 Regulatory Capital Requirements for Pillar 1 14

7. CREDIT RISK 16

7.1 Credit Risk: Loans and Mortgages 17

7.2 Credit Risk Management 18

7.3 Credit Risk: Interbank Lending and Investment Securities 19

7.4 Average and Total Credit Risk Exposure 19

7.5 Standardized Gross Exposures by Geographical Area 20

Table of Contents

7.6 Standardized Gross Exposures by Residual Maturity 20

7.7 Application of the Standardized Approach for Credit Risk 21

7.8 Past Due and Impaired Financial Assets 22

7.9 Past Due and Impaired Loans 23

7.10 Allowance for Credit Losses on Loans, Mortgages and Credit Card Receivables 23

7.11 Loans and Mortgages 25

7.12 Interbank Lending and Investment Securities 25

7.13 Financial Collateral 25

7.14 Counterparty Credit Risk for Derivative Contracts 27

7.15 Securitizations 28

8. LIQUIDITY RISK 29

8.1 Liquidity Coverage Ratio (LCR) 30

8.2 Net Stable Funding Ratio (NSFR) 31

9. MARKET RISK 33

9.1 Interest Rate Risk 33

10. OPERATIONAL RISK 37

10.1 Capital Calculation Methodology 37

1. Cautionary Statements Regarding Forward-Looking Statements

These Capital and Risk Management Pillar 3 Disclosures as at March 31st, 2025 contain certain forward-looking statements with respect to the consolidated financial condition, results of operations and business of Clarien Bank Limited ("Clarien" or "the Bank"). All statements, other than statements of historical facts, included or referenced in this document which address the activities, events or developments that we expect or anticipate will or may occur in the future, are forward-looking statements. The words 'will', 'believe', 'expect', 'anticipate', 'project', 'estimate', 'predict' and similar expressions are also intended to identify forward-looking statements. These forward-looking statements may include, among others, statements with respect to our liquidity and capital requirements; business strategy; financial and operating targets or plans; projections of revenues, income, market share or other financial forecasts; expansion and growth of our business and operations; and future capital expenditures.

These statements are based on certain assumptions and analyses we have made in light of our experience and perception of historical trends, current conditions and expected future developments, as well as other factors believed to be appropriate in the circumstances. However, whether actual results and developments will conform to expectations and predictions is subject to a number of risks and uncertainties that could cause actual results to differ materially from expectations, including, among others, the risks discussed in this disclosure document.

Consequently, all of the forward-looking statements made in this document are qualified by these cautionary statements and the results or developments that we anticipate may not be realized or, even if substantially realized, they may not have the expected consequences to, or effects on, us or our business or operations. The Bank assumes no obligation to update publicly any such forward-looking statements, whether as a result of new information, future events or otherwise.

The Bank has adopted the new Basel III framework for the revised approach for the calculation of credit risk as issued by the Bermuda Monetary Authority (BMA). However, Pillar III disclosures currently remain based on the previous reporting tables. The Bank will update and align its disclosures with the revised templates once they are formally issued by the Authority.

2. Introduction

2.1 Regulatory Framework for Disclosures

The Bermuda Monetary Authority ("BMA") supervises Clarien both on an unconsolidated and consolidated basis in accordance with prudential regulatory capital framework established by the Basel Committee on Banking Supervision ("BCBS") known as Basel III. This is structured around three "pillars"; minimum capital requirements (Pillar 1); supervisory review processes (Pillar 2) and market discipline (Pillar 3) with the overall objective being to raise the quality, consistency and transparency of the capital base, limit the build-up of excess leverage and increase capital requirements for the banking sector.

Basel III came into effect in Bermuda on 1st January 2015 upon the publication of the BMA's "Basel III for Bermuda Banks – Final Rule" and superseded the BCBS's Basel II framework which had been in effect in Bermuda since 1st January 2009. The Basel III revisions adopted Common Equity Tier 1 Capital (CET1) as the primary and predominant form of regulatory capital with the intention that this should be able to absorb losses such that a bank is able to continue in operation as a going concern. The BMA prescribed the following minimum capital requirements at that time:

- CET1 must be at least 4.5% of Risk-Weighted Assets ("RWA") at all times.
- Tier 1 capital must be at least 6.0% of RWA at all times, and;
- Total capital (Tier 1 plus Tier 2) must be at least 8.0% of RWA at all times.

These regulatory limits do not include Pillar 2 related capital ratio add-ons, which form part of the BMA's prudential supervision.

In addition to the above, the Basel III rules also provide for the following additional capital requirements:

- A Capital Conservation Buffer designed to ensure that banks build up and retain capital buffers outside of periods of stress that can be drawn upon in exceptional circumstances if severe losses are incurred. This was set at 2.5% of RWA.
- A Countercyclical Buffer composed of CET1 of up to 2.5% of RWAs during periods in which the BMA assesses there to be excessive credit or other pressures building in the banking sector. No Countercyclical Buffer has been implemented to date.
- A Capital Surcharge for Domestic Systemically Important Banks ("D-SIB") composed of CET1 of between 0.5% and 3.0% of RWA based on the BMA's assessment of the size, interconnectedness, substitutability and complexity of each Bermuda bank. The D-SIB is set independently by the BMA for each institution.

The Basel III rules also address the areas of leverage and liquidity. The Authority adopted a Liquidity Coverage Ratio ("LCR") requirement of a minimum of 100% to ensure banks have sufficient stock of unencumbered highly liquid assets ("HQLA") to survive a significant liquidity stress scenario lasting 30 days. The LCR is calculated as HQLA divided by total net cash outflows (as defined by the Authority) over the period of the next 30 days. In addition, a minimum 5% Leverage Ratio was also introduced. This is calculated as the ratio of CET1 to total on- and off-balance sheet exposure.

Further information regarding the implementation of Basel III can be found on the Bermuda Monetary Authority's website www.bma.bm.

2.2 Basis of Disclosure

This disclosure document has been prepared by Clarien on a standardized basis in accordance with the standards issued by BCBS entitled "Revised Pillar 3 Disclosure Requirements" (January 2015) and by the BMA entitled "Pillar 3 Disclosure Requirements – Consolidated and Enhanced Framework" (March 2017).

All figures are expressed in Bermuda dollars in thousands as at March 31st, 2025 unless specified otherwise. Certain tables in this report may not sum due to rounding. While the disclosures were prepared in accordance with regulatory capital adequacy concepts and rules, they were not subject to external audit.

2.3 Scope of Application

The Bank's Consolidated Financial Statements as of March 31st, 2025, include the results of operations for the following subsidiary companies, all of which are, all were, wholly owned:

Legal entity	Activity
First Bermuda Group Limited	Holding Company
Onshore Nominees Limited	Nominee Company of First Bermuda Group Limited
Offshore Nominees Limited	Nominee Company of First Bermuda Group Limited
Clarien Investments Limited ("CIL")	Investment management
Clarien Brokerage Limited	Brokerage Services; Subsidiary of CIL
Clarien BSX Services Limited	Listing Sponsor of Bermuda Stock Exchange; Subsidiary of CIL
Clarien Trust Limited	Trust administration
Clarien Corporate Services Limited	Corporate administration services

The Bank has no capital deficiencies, nor are there any restrictions, practical or legal impediments to the transfer of funds between the Bank and any of its subsidiaries.

All risk disclosures made for Clarien a consolidated legal entity in line with regulatory returns made to the BMA with the exception of those relating to Liquidity Coverage Ratio (LCR), Net Stable Funding Ratio (NSFR) and Interest Rate Risk in the Banking Book (IRRBB) as they apply solely to its banking business.

2.4 Media and Location

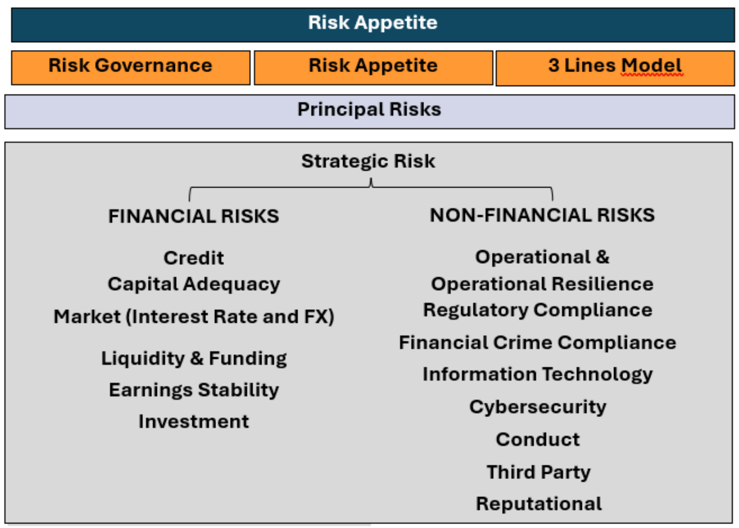
A copy of these Pillar 3 disclosures may be accessed on the Bank's website www.clarienbank.com. It was published following Board approval.

3. Risk Management Objectives And Policies

3.1 Risk Management Framework

Clarien's business strategy, priority-setting and decision-making processes are informed and shaped by an understanding of its risk profile. A comprehensive understanding of what these risk exposures are and how they may be affected by a range of external threats and uncertainties informs risk appetite setting and risk management practices.

Clarien operates an enterprise-wide risk management framework that is designed to embed a strong risk and compliance culture across the organization, promote risk awareness and sound operational decision making, and ensure that the risks it assumes are of a type and level that is consistent with its strategic goals. Its principal elements are shown in the diagram below:



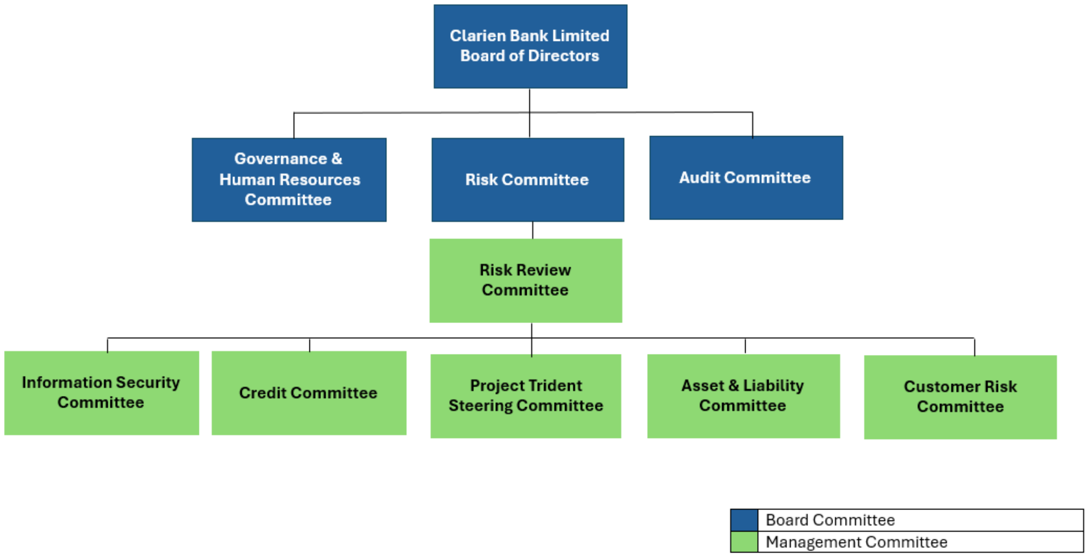
3.2 Risk Culture

Clarien's culture supports risk awareness by encouraging employees to understand how they contribute to the Bank's ability to deliver its strategic objectives and business plans in a safe and sustainable way. It establishes both a collective responsibility and personal accountability for the ownership and management of the risks inherent in the Bank's business activities and promotes a commitment to competence, process, and good governance.

The culture begins with Clarien's Board of Directors and executive team, which lead by example, with consistent and clear communication of a commitment to manage risk at all levels of the organization. Employees are recruited not only with the core skills, abilities and attitude required to fulfill their role but also for their ability to contribute to this culture. They are provided with training to ensure they develop and maintain required levels of competence and are given to a comprehensive suite of policies, procedure, and tools to guide sound decision making and the exercise of good judgement with risk in mind. Risk management is also embedded in employee objective-setting and forms a key component of the annual performance appraisal processes and compensation discussions.

3.3 Risk Governance

A representation of CBL's risk governance structure is provided below:



CBL's Board of Directors has overall responsibility for determining risk management strategy, setting risk appetites and tolerances, and ensuring that risk is monitored and controlled effectively across the totality of the Bank and its consolidated regulated subsidiaries. It is supported in the execution of these responsibilities by the Boards of Directors of CIL, CTL and CCSL, which oversee the sufficiency of the risk management practices established by these subsidiaries and the effectiveness of the systems of internal control specific to their operations, and by the following dedicated committees:

The Risk Committee: This assists the Board in fulfilling its responsibilities by overseeing Clarien's risk profile and its performance against approved risk appetites and tolerance thresholds. Specifically, the committee considers the sufficiency of Clarien's policies, limits, and risk management processes through which it identifies, measures, monitors, and controls activities that give rise to the various risks shown above, as well as overseeing its compliance with laws, regulations, and codes of conduct. It is chaired by a Non-Executive Director of the Board.

The Audit Committee: This reviews the overall adequacy and effectiveness of Clarien's system of internal controls and the control environment, including in respect of the risk management process. It reviews recommendations arising from internal and independent auditors and considers the sufficiency and timeliness of the corrective actions taken by Management. It is chaired by an Independent Director of the Board.

The Governance and Human Resources Committee: This reviews the overall adequacy and effectiveness of Clarien's corporate governance framework, including in respect of risk governance; its management of people risk and the strategies with which its culture and values are embedded throughout the organisation. It is chaired by the Lead Independent Director of the Board.

Clarien's executive management team is led by the Chief Executive Officer. Through the actions of its individual members and the activities of its Performance Review Committee and Product & Change

Management Committee, it is responsible for recommending and executing against business strategy, as well as for monitoring, evaluating and managing risks arising or assumed across the franchise. It is supported in the execution of these risk management activities by the following committees:

The Risk Review Committee: Chaired by the Chief Risk Officer and comprised of members of its executive and senior management teams, the Committee provides its members with a 360▫ view of Clarien's risk profile, including (but not restricted to) its exposures to credit, investment, market, capital and liquidity risks; legal, regulatory, fiduciary, conduct and financial crime risks; operational, cyber-security and third-party risks, and; ESG, insurance and reputational risks. It also assesses the effectiveness of the strategies associated through which these and other emerging risks identified are managed, ensures compliance with applicable laws and regulations, and monitors exposures relative to Board-approved appetites and tolerance thresholds. In doing so, the Committee reviews and recommends Clarien's Capital Assessment & Risk Profile, Recovery and Liquidity Contingency Plans (including related stress tests) as well as several of the key risk policies to the Board for approval every year.

The Asset and Liability Committee: Chaired by the Chief Financial Officer and comprised of members of its executive and senior management teams, the Committee is responsible for overseeing the management of Clarien's exposure to liquidity, funding, interest rate and foreign exchange risks, including the effectiveness of the policies through which it manages its investment portfolio and balance sheet structure.

The Credit Committee: Chaired by the Chief Risk Officer and comprised of members of its executive and senior management teams, the Committee is responsible for all aspects of credit risk management, including policy development and approval, portfolio review, credit transaction approval, approval of provision recommendations and model performance oversight.

The Information Security Committee: Chaired by the Head of Compliance & Operational Risk and comprised of members of its executive and senior management teams, the Committee is responsible for formulating and recommending Clarien's information security policy, overseeing its effective implementation, monitoring the threat horizon, and providing clear direction and support for security-related initiatives, including those associated with its continued compliance with regulatory requirements.

The Customer Risk Committee: Chaired by the Head of Compliance & Operational Risk and comprised of members of its senior management teams, the Committee meets on an as-needed basis to review any proposal that may expose Clarien to elevated levels of reputational risk or require the performance of enhanced levels of customer due diligence.

The Project Trident Steering Committee: Chaired by the Chief Operating Officer and comprised of the entirety of Clarien's executive management team, members of senior management, the leadership team with day-to-day responsibility for the delivery of the project and subject matter expertise drawn from a leading 3rd party vendor, the Committee oversees the execution of the portfolio of projects that will collectively lead to the replacement of Clarien's core banking, e-banking and mobile banking solutions and the migration of the delivery of its technology solutions to Cloud-based Software as a Service and Platform as a Service models.

3.4 Risk Appetite

Risk appetite is a key component of Clarien's risk management framework. Clarien's Board of Directors has established a Risk Appetite Statement ("RAS") to provide executive management with top-down direction on the amounts and types of risk the Bank is willing to accept to achieve its strategic objectives and business plan. This is reviewed every year as a minimum.

To ensure there is a consistency of understanding as to the Board's intention and its direction to management regarding the amount of risk that may be assumed, the following classification system is applied to the nine broad categories of risk incorporated into the RAS:

Classification	Definition
Avoid	The avoidance of risk and uncertainty is a key objective. Cost will be incurred to eliminate exposure to inherent risk.
Averse	Preference for very safe options that offer a low degree of inherent risk. Potential benefit / return is not considered a key driver.
Cautious	Preference for safe options. Willing to tolerate a degree of inherent risk in order to achieve key deliverables if this is considered to be controllable to a large extent and the residual risk is considered low.
Open	Open to opportunities. The high(er) level of inherent risk assumed, if appropriately managed and mitigated, is balanced if not outweighed by the level of benefit offered.

The Risk Review Committee and Risk Committee of the Board consider reporting on Clarien's alignment with the RAS every quarter, including the actions taken by executive management to address any areas of concern or pressure-points identified and any recommendations it may put forward as to how this should evolve to address new or emerging risks identified.

3.5 Risk and Control Management

Clarien manages its exposure to risk through a "Three lines" model.

First Line Management comprises ("1LM") comprises operational management. It is responsible for leading and directing the application of resources on a day-to-day basis to achieve the business strategies of the Bank and its subsidiaries, including the management of the risks it assumes. It does so by:

- Defining, documenting, communicating and maintaining the business processes through which Clarien operates.
- Organizing and cascading responsibility and authority structures.
- Establishing an effective internal controls system to ensure (amongst other things) that:
  - business processes are being applied and are functioning as intended;
  - financial and management information is reliable, timely and complete;
  - reasonable checks are in place on managerial and employee discretion;
  - Clarien operates in compliance with its various obligations, including applicable laws and regulations; and
  - the risks to which it is exposed are being identified, managed and controlled within its risk appetite.

Second Line Management ("2LM") comprises Clarien's risk management and compliance functions. They are responsible for providing complementary expertise, support, analysis monitoring and challenge relating to the management of risk, including:

- The development, implementation and continuous improvement of enterprise-wide risk management practices (including governance and authority frameworks, processes, systems and internal controls).
- The achievement of Clarien's risk management objectives as articulated through its risk appetite and risk policies.
- The implementation of independent reporting on the adequacy and effectiveness of risk management, including internal control.

The Third Line is represented by Internal Audit. Internal Audit:

- maintains primary accountability to the Board (as delegated to its Audit Committee) and independence from the responsibilities of both 1LM and 2LM.
- Communicates independent and objective assurance and advice to executive management and the Board (and if appropriate, the Subsidiary Boards) on the adequacy and effectiveness of governance and risk management (including internal control) to support the achievement of organizational objective and to promote and facilitate continuous improvement.
- Reports impairments to independence and objectivity to the Board and implements safeguards as required.

3.6 Stress Testing

Clarien's stress testing activities are designed to test its business model and enhance its resilience to external shocks. They help the Board and executive management to better understand and mitigate risk and inform decision making about capital levels and liquidity requirements. They also inform Clarien's RAS as well as its Capital Assessment & Risk Profile, Recovery and Liquidity Contingency planning processes, providing insight into the potential outcomes of a range of severe but plausible stresses and enabling executive management to better formulate and recommend strategies to ensure the Bank's resiliency to such events as a going concern.

Scenarios considered can comprise firm-specific stress (idiosyncratic) or market-wide stress (systemic) events or a combination of the two as well as those mandated by the BMA. The outputs assess projected capital and liquidity adequacy and continued regulatory compliance.

Clarien's stress testing program is overseen by its Finance and Risk functions. Results are reported to the Asset and Liability Committee, Risk Review Committee, Risk Committee and, in cases where they must be submitted to the BMA, to the Board.

4. Key Prudential Metrics

The table below provides an overview of the Bank's key prudential regulatory metrics for the 5 quarters.

KM01 Key Metrics $'000		Mar-25	Dec-24	Sep-24	Jun-24	Mar-24
1	Common Equity Tier 1 (CET1)	160,733	165,443	165,443	151,292	151,292
2	Tier 1	160,733	165,443	165,443	151,292	151,292
3	Total capital	161,332	165,911	165,899	151,832	151,811
	Risk-weighted assets (amounts)					
4	Total risk-weighted assets (RWA)	534,187	576,113	576,010	567,380	558,457
	Risk-based capital ratios as a percentage of RWA					
5	Common Equity Tier 1 ratio	30.09%	28.72%	28.72%	26.67%	27.09%
6	Tier 1 ratio	30.09%	28.72%	28.72%	26.67%	27.09%
7	Total capital ratio	30.20%	28.80%	28.80%	26.76%	27.18%
	Additional CET1 buffer requirements as a percentage of RWA					
8	Capital conservation buffer requirement	2.50%	2.50%	2.50%	2.50%	2.50%
9	Countercyclical buffer requirement	-	-	-	-	-
10	Bank D-SIB additional requirements	1.00%	1.00%	1.00%	1.00%	1.00%
11	Total of bank CET1 specific buffer requirements (row 8 + row 9+ row 10)	3.50%	3.50%	3.50%	3.50%	3.50%
12	CET1 available after meeting the bank's minimum capital requirements	22.09%	20.72%	20.72%	18.67%	19.09%
	Basel III Leverage Ratio					
13	Total Basel III leverage ratio measure	1,410,084	1,364,683	1,399,633	1,387,378	1,380,603
14	Basel III leverage ratio (row 2/row 13)	11.40%	12.12%	11.82%	10.90%	10.96%
	Liquidity Coverage Ratio					
15	Total HQLA	379,669	381,521	430,621	444,317	399,419
16	Total net cash outflow	215,164	221,186	264,402	246,568	198,231
17	LCR ratio	176%	172%	163%	180%	201%
	Net Stable Funding Ratio					
18	Total available stable funding	982,676	1,006,714	984,875	993,760	985,717
19	Total required stable funding	748,409	701,940	703,035	687,162	700,422
20	NSFR ratio	131%	143%	140%	145%	141%

Available capital (CET1, Tier1 and Total capital) continues to be in line with previous quarters. The leverage, liquidity and NSFR ratios are well above prescribed regulatory thresholds.

LCR ratio shown above is actual at the end of the relevant quarter whereas the figures in the table LIQ01 in the Liquidity section reflects 6 monthly averages.

5. Capital Resources

The Bank's regulatory capital is allocated into two tiers.

5.1 Total Common Equity Tier 1 Capital

Total Common Equity Tier 1 Capital ("CET 1") includes ordinary shares, contributed surplus, retained earnings and reserves created by appropriations of retained earnings. Within retained earnings, profits are only included where audited or reviewed by external auditors, however, losses must be taken into account, whether reviewed or not. A deduction from CET 1 is made in respect of goodwill. Ordinary shares carry no right to regular dividends.

5.2 Tier 2 Capital

Tier 2 Capital comprises of the expected credit losses only related to Stage 1. The table below shows a reconciliation between accounting and regulatory capital.

Reconciliation of accounting capital to regulatory capital	**Mar-25**	**Dec-24**
Common share capital	5,000	5,000
Retained earnings	114,271	116,121
Contributed surplus	46,406	46,406
General reserve	10,000	10,000
Accumulated other comprehensive income	(35,171)	(41,902)
Total Shareholder's Equity	**140,506**	**135,625**
Regulatory adjustments:		
Goodwill	(8,257)	(8,257)
Comprehensive loss: Unrealized losses on AFS Porfolio	35,171	41,902
Revaluation adjustment	0	(8)
Unaudited Earnings	(6,687)	(3,819)
Total CET 1 Capital	**160,733**	**165,443**

	Mar-25	**Dec-24**
Total CET1 Capital	160,733	165,443
Tier 1 Capital	160,733	165,443
Loan Loss Provision -Stage 1	599	468
Total Capital available	**161,332**	**165,911**

As at 31st March 2025, the CET1, Tier 1 and Total capital ratios of the Group were 30.09%, 30.09% and 30.20% respectively.

	Table CC1	a Amounts
Common Equity Tier 1 capital: instruments and reserves		
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus	51,406
2	Retained earnings	107,584
3	Accumulated other comprehensive income (and other reserves)	10,000
6	**Common Equity Tier 1 capital before regulatory deductions**	168,990
Common Equity Tier 1 capital regulatory adjustments		
8	Goodwill (net of related tax liability)	8,257
9	Other intangibles other than mortgage servicing rights (net of related tax liability)	0
28	**Total regulatory adjustments to Common Equity Tier 1**	**8,257**
29	**Common Equity Tier 1 capital (CET1)**	**160,733**
44	**Additional Tier 1 capital (AT1)**	-
45	**Tier 1 capital (T1= CET1 + AT1)**	**160,733**
Tier 2 capital: instruments and provisions		
50	Provisions	599
58	**Tier 2 capital (T2)**	**599**
59	**Total regulatory capital (TC = T1 + T2)**	**161,332**
60	**Total risk-weighted assets**	**534,187**
Capital ratios and buffers		
61	Common Equity Tier 1 (as a percentage of risk-weighted assets)	30.09%
62	Tier 1 (as a percentage of risk-weighted assets)	30.09%
63	Total capital (as a percentage of risk-weighted assets)	30.20%
68	Common Equity Tier 1 (as a percentage of risk-weighted assets) available after meeting the bank's minimum capital requirement.	22.09%

Table CC2	a Balance sheet as in published financial statements As at period-end	b Under regulatory scope of consolidation As at period-end
Assets		
Cash & cash equivalent	223,885	132,788
Investment securities	369,361	462,589
Prepayments, accrued income and other assets	16,537	15,456
Accrued interest on cash, deposits with banks & securities	2,053	-
Loans & advances	741,114	742,975
Goodwill and other intangible assets	31,516	31,516
Of which: goodwill	8,257	8,257
Of which: intangibles (excluding MSRs)	23,259	23,259
Of which: MSRs	-	-
Property, plant and equipment	17,942	17,942
Total assets	1,402,408	1,403,266
Liabilities		
Deposits from banks	-	-
Items in the course of collection due to other banks	-	-
Customer accounts (deposit liabilities)	1,247,981	1,247,981
Accruals, deferred income and other liabilities	13,921	14,180
Provisions	-	-
Retirement benefit liabilities	-	-
Total liabilities	1,261,902	1,262,161
Shareholder's equity		
Paid-in share capital	51,406	47,806
Of which: amount eligible for CET1	51,406	47,806
Of which: amount eligible for AT1	-	-
Retained earnings	124,271	128,470
Accumulated other comprehensive income	(35,171)	(35,171)
Total shareholder's equity	140,506	141,105

Most of the individual differences are due to differences in grouping methodology under financial statements and Regulatory reporting. The total difference is insignificant.

5.3 Leverage Ratio

Basel III introduced a non-risk based leverage ratio to supplement the risk based capital requirements. The ratio shows the Tier 1 capital as a proportion of on and off-Balance Sheet assets. The BMA leverage ratio framework requires a minimum ratio of 5%.

The table below provides a reconciliation of accounting assets, and the leverage exposure measured as at the end of the two quarters, March 2025, and December 2024:

LR1 Ratio Exposure measure amounts in $'000	**Mar-25**	**Dec-24**
Total consolidated assets as per published financial statements	1,402,408	1,355,949
Adjustments for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	-	-
Adjustments for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	15,073	15,925
Other adjustments (including Goodwill)	(7,397)	(7,191)
Leverage ratio exposure measure	**1,410,084**	**1,364,683**

The Bank's ratio exceeds the minimum requirement as disclosed in the table below as prescribed in the guidance, as at March 31st, 2025.

	LR2 Leverage Ratio amounts in $'000	**Mar-25**	**Dec-24**
On-balance sheet exposures			
	On-balance sheet exposures (excluding derivatives and securities financing transactions (SFTs), but including collateral)	1,402,408	1,355,949
	(Asset amounts deducted in determining Basel III Tier 1 capital)	(7,397)	(7,191)
	Total on-balance sheet exposures (excluding derivatives and SFTs)	**1,395,011**	**1,348,758**
Other off-balance sheet exposures			
	Off-balance sheet exposure at gross notional amount	73,236	76,993
	(Adjustments for conversion to credit equivalent amounts)	(58,163)	(61,068)
	Off-balance sheet items	**15,073**	**15,925**
Capital and total exposures			
	Tier 1 capital	**160,733**	**165,443**
	Total exposures	**1,410,084**	**1,364,683**
Leverage ratio			
	Basel III leverage ratio	**11.40%**	**12.12%**

The leverage ratio has increased from the previous quarter due to an increase in Tier 1 capital.

6. Capital Adequacy

6.1 Overview

Capital is held to provide a cushion for unexpected losses. The Board sets the internal level of capital within its risk tolerance articulated in the risk appetite statement with the aim of ensuring minimum regulatory capital levels, as set, and monitored by the BMA, are always exceeded.

The Bank's minimum regulatory capital is a combination of the requirements derived from Pillar 1 and Pillar 2 rules, as detailed in section 2.2.

Management of the Bank assesses, measures, and documents all risk exposures (Pillar 1 and 2), governance and internal control environment and strategic and capital planning considerations in its CARP which is submitted annually to the BMA. In addition to the annual CARP process, the Bank's Pillar 1 capital requirements are regularly monitored and are formally reported on a quarterly basis to the BMA and the Board.

6.2 Regulatory Capital Requirements for Pillar 1

Regulatory ratios for Pillar 1 are calculated by dividing total regulatory capital by risk weighted assets (RWA). RWA are determined according to the varying levels of risk attached to assets and off-balance sheet exposures, using Basel guidelines.

The following table shows the Bank's overall minimum Pillar I capital requirement for credit, operational, and market risk, based on an 8% risk weighting:

OV1 Risk Weighted Assets		RWA		Minimum capital requirement
		Mar-25	Dec-24	Mar-25
1	**Credit risk (excluding counterparty credit risk)**	**451,117**	**493,058**	**36,089**
2	Of which: standardised approach (SA)	451,117	493,058	36,089
6	**Counterparty credit risk (CCR)**	-	-	-
10	Credit valuation adjustment (CVA)	-	-	-
11	Equity positions under the simple risk weight approach	-	-	-
12	Equity investments in funds - look-through approach	-	-	-
13	Equity investments in funds - mandate-based approach	-	-	-
14	Equity investments in funds - fall-back approach	-	-	-
15	**Settlement risk**	-	-	-
16	**Securitisation exposures in the banking book**	**31**	**16**	**2**
19	Of which: securitisation standardised approach (SEC-SA)	31	16	2
20	**Market risk**	-	-	-
23	Capital charge for switch between trading book and banking book	-	-	-
24	**Operational risk**	**83,039**	**83,039**	**6,643**
25	Amounts below thresholds for deduction (subject to 250% risk weight)	-	-	-
26	Floor adjustment	-	-	-
27	**Total**	**534,187**	**576,113**	**42,735**

Difference between regulatory exposure amounts and carrying value in financial statements:

Due to a simple business model and absence of any complex financial instruments such as derivatives etc. the regulatory exposure amounts are similar to carrying values in financial statements, with differences reflected in individual asset/liabilities classes purely driven by grouping/classification methodology.

Table LI1	a	b	c	d	e	f	g
			Carrying values of items:				
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Subject to credit risk framework	Subject to counterparty credit risk framework	Subject to the securitisation framework	Subject to market risk framework	Not subject to capital requirements or subject to deduction from capital
Assets							
Cash and cash equivalent	223,885	132,788	132,788	-	-	-	-
Loans and advances	741,114	742,975	742,975	-	-	-	599
Investment securities	371,414	462,589	462,582	-	7	-	-
Goodwill	8,257	8,257	-	-	-	-	8,257
Other Assets	57,738	56,657	56,657	-	-	-	-
Total Assets	1,402,408	1,403,266	1,395,002	-	7	-	8,856
Liabilities							
Deposit Liabilities	1,247,981	1,247,981	-	-	-	-	1,247,981
Items in the course of collection	-	-	-	-	-	-	-
Other Liabilities	13,921	14,180	-	-	-	-	14,180
Repurchase agreements	-	-	-	-	-	-	-
Trading portfolio liabilities	-	-	-	-	-	-	-
Financial liabilities designated at fair value	-	-	-	-	-	-	-
Derivative financial instruments	-	-	-	-	-	-	-
Total Liabilities	1,261,902	1,262,161	-	-	-	-	1,262,161

As the difference between the two categories is insignificant, presentation of table LI2 is not required.

7. Credit Risk

Credit risk is inherent in the Bank's various lending and business activities. Credit risk is the risk of loss arising from a customer or counterparty failing to meet their financial obligations to the Bank as they fall due. The Bank provides credit through residential and commercial mortgages, secured and unsecured loans and credit cards. The majority of mortgage lending is originated by the Bank and retained and serviced within its personal and business lending units. The Bank also participates in a small number of syndicated loan transactions and club deals, nearly all of which are originated by its parent as lead arranger.

Adverse changes in the credit quality of borrowers or a general deterioration in economic conditions could affect the recoverability and value of Clarien's assets and therefore its financial performance. Comprehensive risk management methods and processes have been established as part of Clarien's overall risk framework to measure, mitigate and manage credit risk within Clarien's risk appetite.

Exposure, as shown in these credit risk disclosures, is defined as the exposure value under the regulatory definitions for capital purposes.

Clarien uses a wide range of techniques to reduce the credit risk of its lending. The most basic of these is performing an assessment of the ability of a borrower to service the proposed level of borrowing without distress. However, the risk can be further mitigated by obtaining security for the funds advanced.

The table below shows the credit quality of assets, broken down by loans and debt securities. This table includes both unsecured and secured exposures, and the value of exposures secured by collateral as at March 31st, 2025.

CR1 Credit Quality of Assets		a	b	c	d	e	g
		Carrying values of		Allowances/ impairments	Of which ECL accounting provisions for credit losses on SA exposures		Net values (a+b-c)
		Defaulted exposures	Non-defaulted exposures		Allocated in regulatory category or Specific	Allocated in regulatory category or General	
1	Loans	60,537	705,524	23,685	23,086	599	742,376
2	Debt securities	-	462,589	-	-	-	462,589
3	Off-balance sheet exposures	-	73,236	-	-	-	73,236
4	**Total**	**60,537**	**1,241,349**	**23,685**	**23,086**	**599**	**1,278,201**

Defaulted exposures refer to the gross carrying value of exposures that are past due for more than 90 days.

Clarien uses the standardized approach for the following credit risk exposure classes, and these are displayed in the following tables section 8.4 to 8.6:

- Cash in hand;
- Claims on Sovereigns and Multilateral Development banks;
- Public Sector Entities;
- Corporates (non-financial);
- Banks and Securities Firms;
- Securitizations;
- Retail loans;
- Retail mortgages (secured against residential property);

- Commercial mortgages (secured against property);
- Past due loans;
- Other Balance Sheet exposures; and
- Non-market related items.

7.1 Credit Risk: Loans and Mortgages

The effective management of credit risk requires the establishment of an appropriate credit risk culture. Key credit risk policies and credit risk management strategies are important elements used to create this culture. The Bank has implemented appropriate internal processes and risk-oriented strategies for actively identifying, managing, monitoring, and reporting credit risk on its mortgage and non-mortgage portfolios which are suitable to the nature, scale, and complexity of the business. This is supported by policies and controls such as internal approval limits and thresholds.

The Board, through its Risk Committee, and the management Risk Review Committee and Credit Committee, reviews and approves the Bank's credit risk strategy and credit risk policies. The Board adopts credit limits (e.g. LTVs) and risk appetite thresholds within those defined by the BMA, always maintaining the regulatory minimums.

The objectives of the credit risk strategy are to ensure that:

- The risk parameters for new underwritings, and for the portfolio as a whole are clearly specified;
- Target markets and product offerings are well defined at both enterprise-wide and business line levels;
- Transactions and limits are managed in a manner that is consistent with the Bank's risk appetite;
- Loans are priced on a risk adjusted basis;
- Loans are appropriately collateralized and collateral is maintained and valued periodically;
- Credit risk is managed from concentration and country risk perspectives; and
- Sufficient information and data is maintained to be able to track and monitor changes over time.

The credit risk policy articulates the credit risk management framework, including:

- Aggregate limits, beyond which credit applications must be escalated to the Bank's Credit Committee and Risk Committee; and
- Single name/aggregation exposures, beyond which exposures must be reported and reviewed by the Credit Committee, with Board oversight.

The Bank's Risk Management team develops the credit risk management framework and policies that detail, among other things, the credit risk rating system and associated parameter estimates; the delegation of authority for granting credit; the calculation of the allowance for credit losses; and the authorization of write-offs. The Risk function is headed by the Chief Risk Officer and the team adjudicates credits, performs credit risk analysis and credit risk reporting to the Credit Committee and Risk Committee.

Credit Risk Management generate multiple risk reports for the Risk Review Committee, Credit Committee and Risk Committee of the Board, highlighting risk analysis, delinquency exposures, counterparty and country risk measures and other aggregate / portfolio effects.

Both commercial credit exposures, as well as residential credit risk, are segmented by purpose codes, collateral and applicable industries. The Bank does not have excessive concentration to any single borrower or related group of borrowers. A review of exposures in excess of 5% of the capital base is conducted by the Risk Committee on a quarterly basis.

An integral part of credit risk management, the Asset Remediation function, is to formally review and monitor past due and potential problem loans to determine which credits, if any, need to be charged off. The allowance for credit impairment losses is reviewed quarterly to determine the amount necessary to maintain an adequate provision for credit losses.

Banking units and the Risk function regularly review the various segments of the loan portfolio to assess the impact of economic trends or specific events on the performance of the portfolio and determine whether corrective action is required. The results of these reviews are reported to the Credit Committee and, when significant, to the Risk Committee of the Board.

The Bank's credit risk rating system utilizes an eight-point scale used to differentiate the risk of default of borrowers and the risk of loss on facilities. The Bank's credit risk rating system is subject to a governance and oversight framework. The objectives of this framework are to ensure that:

- Credit risk ratings, methodologies and parameters are appropriately designed and developed, independently validated, and regularly reviewed; and
- The review and validation processes represent an effective challenge to the design and development process.

7.2 Credit Risk Management

Business groups within the Bank analyze, evaluate, and recommend all credit requests and financial restructurings to the CRM function. To ensure that risks are adequately assessed, properly approved, continually monitored, and actively managed, CRM provides the independent adjudication function. The decision-making process begins with an assessment of the credit risk of the individual borrower or counterparty. Key factors considered in the assessment include:

- The borrower's debt service ability;
- The borrower's current and projected income, financial results or credit statistics;
- The industry in which the borrower operates;
- Economic trends;
- Collateral risk; and
- An assessment of the borrower's management.

Based on this assessment, a risk rating is assigned at the facility (or counterparty) level, taking into consideration additional factors, such as collateral/security, structure, term and any other forms of credit risk mitigation or credit enhancements that may affect the amount of potential loss in the event of a default. Security typically takes the form of registered mortgages or charges over real estate; or inventory, receivables and operating assets when lending to corporate and commercial borrowers; and cash or treasuries for trading lines such as securities lending, repurchase transactions, and derivatives. The use of such collateral is in line with terms that are usual and customary to standard lending activities in Bermuda. The types of acceptable collateral and related third party valuation processes are documented in risk management policies and manuals. Other forms of credit risk mitigation include third party guarantees and, in the case of derivatives facilities, master netting agreements.

The Credit Committee (depending on the size of the overall exposure) is the final arbiter of internal risk ratings. Individual credit exposures are regularly monitored by the business line units, Finance and Risk Management for any signs of deterioration and losses are re-rated as necessary.

7.3 Credit Risk: Interbank Lending and Investment Securities

The Bank engages in short-term lending to other bank counterparties and invests in securities as part of its ongoing liquidity management program. Risks are managed within specific counterparty limits approved by the Credit Committee and limits, asset quality plans and criteria set out in the Bank's Investment Policy Statement, which is approved by the Risk Committee. Furthermore, the portfolio will comply with the current Credit Risk Policy and limits approved by the Credit Committee. The Bank uses external credit agency ratings, as detailed in section 7.7, supplemented by internal analysis to manage the risks associated with interbank lending and investment activities.

7.4 Average and Total Credit Risk Exposure

The following table sets out asset class exposures as at March 31st, 2025. Amounts include on and off-Balance Sheet exposures after applying regulatory credit conversion factors.

Exposures under the standardised approach	**Average Exposure $'000**	**Exposure as at Mar 2025 $'000**
Cash	16,687	18,153
Claims on Sovereigns and multilateral development banks	373,977	339,073
Claims on Public Sector Entities	144,281	153,521
Claims on Corporates	153,200	127,149
Claims on Banks and Securities Firms	146,634	184,335
Securitisations	8	7
Retail Loans	28,939	12,419
Residential Mortgages	361,511	357,765
Commercial Mortgages	55,631	106,373
Past Due Loans	38,054	38,042
Other Balance Sheet Exposures	55,481	58,174
Non-market Related Off Balance Sheet Credit Exposures	74,452	73,236
Total exposures under the standardised approach	**1,448,855**	**1,468,247**

7.5 Standardized Gross Exposure by Geographical Area

The table below shows an analysis of credit risk by geographical location as at March 31st, 2024. The geographical area is determined by the country of incorporation for companies and for individuals by the country of residence.

Exposures under the standardised approach	North America $'000	Europe $'000	Australia $'000	Total $'000
Cash	18,153	-	-	18,153
Claims on Sovereigns and multilateral development banks	322,879	15,263	931	339,073
Claims on Public Sector Entities	153,521	-	-	153,521
Claims on Corporates	117,126	10,023	-	127,149
Claims on Banks and Securities Firms	137,196	47,139	-	184,335
Securitisations	7	-	-	7
Retail Loans	12,419	-	-	12,419
Residential Mortgages	357,765	-	-	357,765
Commercial Mortgages	106,373	-	-	106,373
Past Due Loans	38,042	-	-	38,042
Other Balance Sheet Exposures	58,174	-	-	58,174
Non-market Related Off Balance Sheet Credit Exposures	73,236	-	-	73,236
Total exposures under the standardised approach	**1,394,891**	**72,425**	**931**	**1,468,247**

7.6 Standardized Gross Exposures by Residual Maturity

The table below sets out an analysis of credit risk by maturity as at March 31st, 2025. Residual maturity of exposures is based on contractual maturity dates and not expected or behaviorally adjusted dates. Cash flows receivable over the life of the exposure are not included.

Asset class exposures by residual maturity	Within 1 yr $'000	After 1 but within 5 years $'000	After 5 years $'000	Total $'000
Cash	18,153	-	-	18,153
Claims on Sovereigns and Multilateral Development Banks	139,974	61,098	138,001	339,073
Claims on Public Sector Entities	26,499	65,237	61,785	153,521
Claims on Corporates	3,143	43,440	80,566	127,149
Claims on Banks and Securities Firms	114,635	-	69,700	184,335
Securitisations	-	-	7	7
Retail	5,928	2,977	3,514	12,419
Residential Mortgages	6,988	29,648	321,129	357,765
Commercial Mortgages	58,017	17,637	30,719	106,373
Past Due Loans	12,418	1,982	23,642	38,042
Other Balance Sheet Exposures	8,412	-	49,762	58,174
Non-market Related Off Balance Sheet Credit Exposures	60,071	13,165	-	73,236
Total exposures under the standardised approach	**454,238**	**235,184**	**778,825**	**1,468,247**

7.7 Application of the Standardized Approach for Credit Risk

The standardized approach stipulates that banks should use an External Credit Assessment Institution ("ECAI"), such as a credit rating agency, to determine the risk weighting applied to exposures to certain counterparties.
The Bank uses eligible external ratings from Standard & Poor's ("S&P") and Moody's as its nominated ECAI to assign exposures a credit quality step and thus calculate the credit risk capital requirement for the following classes of exposure: Sovereigns and multilateral development banks ("MDB's"); Public sector entities; Corporates; and Banks and Securities firms. The Bank does not make material use of on- or off-Balance Sheet netting for all applicable exposure classes.

Where there are assessments by two chosen ECAIs that map to different risk weights, the higher risk weight applies and where no external rating is used in the RWA calculation, the unrated credit quality step applies.

Below table presents the mapping between the external ratings and the Credit Quality Steps ("CQS").

Credit Quality Step	S&P's assessments	Moody's assessments
1	AAA to AA-	Aaa to Aa3
2	A+ to A-	A1 to A3
3	BBB+ to BBB-	Baa1 to Baa3
4	BB+ to BB-	Ba1 to Ba3
5	B+ to B-	B1 to B3
6	CCC+ and below	Caa and below

All other exposure classes are assigned risk weightings as prescribed in the BMA's regulatory guidance.

The following table provides, for material segments only, an analysis of exposures by credit quality steps as at March 31st, 2025:

	Credit Quality step	Risk weight %	Exposure '000	Exposure after credit risk mitigation '000
Sovereigns and MDB's				
	1	0%	339,073	339,073
	Total		339,073	339,073
Public Sector entities				
	2	50%	140,720	33,996
	3	100%	12,802	12,802
	Total		153,521	46,797
Corporates				
	1	20%	16,962	16,962
	2	50%	40,078	40,078
	3	85%	7,615	6,999
	4	100%	62,494	30,494
	Total		127,149	94,533
Banks & Securities firms				
	1	20%	114,635	114,635
	2	30%	31,790	31,790
	3	50%	37,910	37,910
	Total		184,335	184,335

7.8 Past Due and Impaired Financial Assets

At each reporting date, the Bank assesses whether there is objective evidence that financial assets not carried at fair value through profit and loss are impaired. Evidence of impairment may include indications that the borrower or group of borrowers is experiencing significant financial difficulty, default or delinquency in interest or principal payments or the debt being restructured to reduce the burden on the borrower. A financial asset or a group of financial assets are impaired when objective evidence demonstrates that a loss event has occurred after the initial recognition of the asset(s), and that the loss event has an impact on the future cash flows of the asset(s) that can be estimated reliably.

Objective evidence that financial assets are impaired can include significant financial difficulty of the borrower or issuer, the disappearance of an active market for a security or other observable data relating to a group of assets such as adverse changes in the payment status of the issuers in the group, or economic conditions that correlate with defaults in the group.

Other than loans, mortgages and credit card receivables, no other financial assets were considered to be impaired as at March 31st, 2025.

Collateral obtained to mitigate credit risk is contracted, documented, and safely stored.

The Bank's definition of a financial restructure is any change to a loan's terms that are not predicated on financial difficulty and where the Bank is not granting a concession that it would not have otherwise approved (i.e. changes that do not fall into the TDR definition).

7.9 Past Due and Impaired Loans

In the opinion of management, a loan or mortgage is considered impaired when there has been deterioration in credit quality of the borrower to the extent that there is no longer reasonable assurance as to the timely collection of the full amount of principal and interest. Secured loans and mortgages where interest or principal is contractually past due 90 days or more are automatically classified as impaired, unless management determines that the loan or mortgage is fully secured, is in the process of collection and the collection efforts are reasonably expected to result in repayment of the loan or mortgage and overdue interest in full. For regulatory reporting purposes, loans are classified as past due after 90 days have passed since a payment is missed. Credit card receivables that are contractually 180 days past due are automatically written off.

	CR2 Changes in defaulted loans and securities amounts in $'000	March'25
1	**Defaulted loans and debt securities at the end of the previous reporting period**	**38,356**
2	Loans and debt securities that have defaulted since the last reporting period	3,588
3	Returned to non-default status	(3,195)
4	Amounts written off	-
5	Other changes	(707)
6	**Defaulted loans and debt securities at the end of the reporting period**	**38,042**

Defaulted Loans as per the Table CR1 includes provision allowance amount whereas Table CR2 provides these loan numbers net of allowance. Please see below the reconciliation:

Defaulted Loans as per CR1	60,537
Less: Allowance (on defaulted loans)	(22,495)
Net Defaulted loans as per CR2	38,042

7.10 Allowance for Credit Losses on Loans, Mortgages and Credit Card Receivables

The adequacy of the allowance for credit losses on loans, mortgages and credit card receivables is regularly reviewed by management taking into consideration matters such as current and future macroeconomic conditions, past loss experience and individual circumstances which may affect a borrower's future ability to pay. The allowance for credit losses is established by charges against income and a corresponding reduction of the related asset category, based on management's assessment of the estimated amount of losses within the loan, mortgage and credit card portfolios. The allowance for credit losses consists of Stage 1-3 loan loss allowances as determined under the IFRS 9 accounting standard. The loan loss allowance is the amount required to reduce the carrying value of an impaired loan to its estimated realizable amount. Generally, the estimated realizable amount is determined by discounting the expected future cash flows at the loan's original effective interest rate.

Allowances for group of homogeneous loans are established using a formula approach based on historic data. The methodology uses statistical analysis of historical data on delinquency and collateral trends to estimate the probability of default and expected collateral values respectively. The loss given default is then estimated based on the expected collateral values. The estimate of loss arrived at on the basis of historical information is then reviewed to ensure that it appropriately reflects the economic conditions and product mix at the reporting date. Default rates and loss factors are derived from actual loss experience.

The following tables show the past due and impaired loans as well as net impairment loss on financial

Aging	Classifiaction	Gross loan balance	Loan provision			Net loan balance
			ECL Stage I	ECL Stage II	ECL Stage III	
7 to 30 Days	Commercial	27,308	(50)	-	-	27,258
	Residential	14,010	(94)	(49)	-	13,867
	Retail & Other	72	(1)	-	-	71
31 to 60 Days	Commercial	3,089	-	-	-	3,089
	Residential	7,692	-	(29)	-	7,663
	Retail & Other	-	-	-	-	-
61 to 90 Days	Commercial	-	-	-	-	-
	Residential	1,512	-	(3)	-	1,509
	Retail & Other	979	-	(14)	-	965
Impaired	Commercial	16,238	-	-	(4,772)	11,466
	Residential	40,311	-	-	(15,962)	24,349
	Retail & Other	2,927	-	-	(2,178)	749
Not past due	Commercial	279,167	(219)	-	-	278,948
	Residential	333,246	(202)	(43)	-	333,001
	Retail & Other	35,248	(33)	(35)	-	35,180
Total		764,798	(599)	(173)	(22,912)	741,114

	Commercial Mortgage $'000	Residential Mortgage $'000	Retail & Other $'000	Total $'000
Net impairment loss on financial assets for the period ending March 31, 2025 as recorded in the Consolidated Statement of Comprehensive Income	485	513	19	1,017

All the above loans originated in North America **region**.

The following table summarizes the movement in the allowance for expected credit losses for the six-month period ended March 31st, 2025:

	Stage 1	Stage 2	Stage 3	Total
Balance at September 30, 2024	456	292	22,940	23,688
Net Write offs	-	-	(1,908)	(1,908)
Recoveries	-	-	886	886
Other Adjustments	-	-	-	-
Provision for credit losses	143	(119)	993	1,017
Balance at March 31, 2025	599	173	22,912	23,683

During the period from October 1st, 2024 to March 31st, 2025 $5.9 million of loans were restructured and $2.8 was considered impaired."

Given the Bank's credit policies and procedures, management does not consider loans past due less than 7 days as delinquent.

Credit Risk Mitigation

7.11 Loans and Mortgages

The effective management of credit risk in the Bank's loan book is supported by relevant policies and guidelines on the role of collateral supporting these obligations. The purpose of taking collateral is to act as a secondary source of repayment of the loan if the borrower defaults and is unable to cure the default by means other than the sale of the collateral.

The Bank relies heavily on the valuation and revaluation of individual collaterals, determination of the value of pledged collateral for secured loans, determination of collateral acceptability for the purposes of credit risk mitigation and collateral enforcement, should the client be in default.

Lending Officers, through their credit underwriting analysis and under the guidance of Risk Management, determine whether and what type of collateral is required and the value of that collateral. The type of collateral held can include but is not limited to: residential real estate; commercial properties; debentures covering business assets such as receivables and equipment; and pledging of cash deposits and investment securities portfolios. Significant haircuts are made on investment security portfolios minimizing any potential market risks. Clarien has no exposures to credit derivatives. Guarantees from third parties are also obtained in some instances. Independent third-party valuations of collateral are monitored.

The following table reflects the split between the Banks secured and unsecured exposures, as at March 31st, 2025.

	CR3 CRM techniques	a	b	c	d	e
	Amounts in $000	Exposures unsecured: carrying amount	Exposures secured by collateral	Exposures secured by collateral of which: secured amount	Exposures secured by financial guarantees	Exposures secured by financial guarantees, of which: secured amount
1	Loans	42,896	557,005	557,005	143,074	143,074
2	Debt securities	462,589	-	-	-	-
3	Total	505,485	557,005	557,005	143,074	143,074
4	Of which defaulted	2,141	35,901	35,901	-	-

Please note [CR1:1/g] is equal to sum of the [CR3:1/a] + [CR3:1/b] + [CR3:1/d]

7.12 Interbank Lending and Investment Securities

Collateral held as security for investment securities is determined by the nature of the instrument. Debt securities and treasuries are generally unsecured, whereas asset-backed securities and similar instruments are secured by pools of financial assets.

7.13 Financial Collateral

The overall value of financial collateral used as credit risk mitigation within the Pillar 1 calculations was $176 million against loans and advances to customers as incorporated in the determination of RWA values in Section 6.2 above.

The tables that follow demonstrate the effects of the CRM techniques as at March 31st, 2025.

	CR4 Credit Mitigation Effects amounts in $000s						
		Exposures pre-CCF and CRM		Exposures post-CCF and CRM		RWA	RWA density
	Asset classes	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount		
1	Cash	18,153	-	18,153	-	452	-
2	Sovereigns and their central banks	333,178	-	333,178	-	-	0.00%
3	Public sector entities	153,521	1,058	46,797	423	30,012	63.56%
4	Multilateral development banks	5,895	-	5,896	-	-	-
5	Banks	184,335	-	184,335		51,419	27.89%
6	Securities firms	7	-	7	-	31	442.86%
7	Corporates	127,149	16,440	94,533	7,858	64,213	62.71%
8	Regulatory retail portfolios	12,419	40,437	12,044	671	11,082	87.16%
9	Secured by residential property	357,764	12,089	356,284	4,835	129,027	35.73%
10	Secured by commercial real estate	106,373	3,212	71,151	1,285	64,507	89.05%
11	Equity	1	-	1	-	3	300.00%
12	Past-due loans	38,042	-	38,031	-	41,471	109.05%
13	Higher-risk categories	1,517	-	1,516	-	2,274	150.00%
14	Other assets	56,657	-	56,657	-	56,657	100.00%
	Total	1,395,011	73,236	1,218,583	15,072	451,148	36.57%

There are no significant changes to the above numbers over the reporting period.

	CR5 Exposures by class and RWA amounts in $'000s									
		Risk weight								
	Asset classes	0%	20%	35%	50%	75%	100%	150%	Others	Total credit exposures amount (post CCF and post-CRM)
1	Cash	15,892	2,261	-	-	-	-	-	-	18,153
2	Sovereigns and their central banks	333,178	-	-	-	-	-	-	-	333,178
3	Public sector entities	-	-	-	34,418	-	12,802	-	-	47,220
4	Multilateral development banks	5,896	-	-	-	-	-	-	-	5,896
5	Banks	-	114,635	-	37,910	-	-	-	31,790	184,335
6	Securities firms	-	-	-	-	-	-	-	7	7
7	Corporates	-	16,962	-	40,078	-	36,214	-	9,137	102,391
8	Regulatory retail portfolios	-	-	-	-	6,528	6,187	-	-	12,715
9	Secured by residential property	-	120,747	1,254	-	-	-	-	239,118	361,119
10	Secured by commercial real estate	188	-	-	-	-	26,078	-	46,169	72,436
11	Equity	-	-	-	-	-	-	-	1	1
12	Past-due loans	-	-	-	3,071	-	25,007	9,953	-	38,031
13	Higher-risk categories	-	-	-	-	-	-	1,516	-	1,516
14	Other assets	-	-	-	-	-	56,657	-	-	56,657
	Total	355,154	254,605	1,254	115,477	6,528	162,945	11,469	326,222	1,233,655

There are no significant changes to the above numbers (other than movements between investment asset classes to some extent) over the reporting period.

7.14 Counterparty Credit Risk for Derivative Contracts

The Bank may use derivative instruments to hedge its exposure to market risk, for example foreign exchange and interest rate risk. Counterparty Credit Risk ("CCR") is the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. An economic loss would occur if the transactions or portfolio of transactions with the counterparty has a positive economic value at the time of default. Unlike exposure to credit risk through a loan, where the exposure to credit risk is unilateral and only the lending bank faces the risk of loss, CCR creates a bilateral risk of loss whereby the market value for many different types of transactions can be positive or negative to either counterparty. The market value is uncertain and can vary over time with the movement of underlying market factors.

Currently the Bank does not have any exposure to derivative transactions and has very insignificant counterparty credit risk. Clarien has an exposure to the Bermuda Stock Exchange, as a central counterparty (CCP). Clarien BSX Limited is a direct member of a CCP for local equity securities. The exposure to the exchange is typically short dated and overnight.

In the case where these transactions take place liquidity is held for both additional collateral that would have to be posted in the event of a credit rating downgrade and adverse movements in market rates. Collateral requirements following downgrade are assessed on a contractual basis, whereas liquidity for changes in market rates is assessed using historic market rate volatility.

"Wrong-way risk" may occur when exposure to a counterparty is negatively correlated with the credit quality of that counterparty. Hence, there is a tendency for the exposure to increase as the creditworthiness decreases. This risk is managed through the Investment Policy, which governs the requirements for eligible collateral.

Counterparty limits are approved by Credit Risk Management function.

7.15 Securitizations

The Bank's only exposure to securitizations is through investment in third party securities, the holding at March 31st, 2025 amounted to $7k.

SEC2 Securitizations amounts in $'000	Bank acts as originator			Bank acts as sponsor			Bank acts as investor		
	Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total
Retail (total) - of which	-	-	-	-	-	-	**7**	-	**7**
Residential Mortgage	-	-	-	-	-	-	7	-	7

SEC4 Capital Requirements amounts in $'000	Exposure values (by RW bands)					Exposure	RWA	Capital Charge
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW	SA/SSFA	SA/SSFA	SA/SSFA
Total exposures	-	-	-	-	-	-	-	-
Traditional securitisation	-	-	-	-	-	-	-	-
Of which securitisation	-	-	-	7	-	7	31	2
Of which retail underlying	-	-	-	7	-	7	31	2
Of which wholesale	-	-	-	-	-	-	-	-
Of which re-securitisation	-	-	-	-	-	-	-	-
Of which senior	-	-	-	-	-	-	-	-
Of which non-senior	-	-	-	-	-	-	-	-

8. Liquidity Risk

Liquidity risk is the risk that the Bank is not able to meet its financial obligations as they fall due or can only do so at excessive cost. The Bank's policy is to ensure that sufficient funds are available to meet its ongoing and future commitments to customers and counterparties, both with respect to the demand for loans and the repayment of deposits, and to maintain the confidence of the marketplace in which the Bank operates.

The Bank's Treasury department is responsible for managing liquidity for the Bank on a day-to-day basis. The Finance function provides various liquidity related reports on a daily/monthly basis, reflecting measurement and close monitoring of the liquidity position of the Bank. Apart from this regular reporting to the senior management, ALCO provides direct oversight on this function and reports to the Risk Review Committee from a governance perspective. Management has recommended internal limits on various benchmarks such as LCR, Loan/Deposit ratio, open Foreign Exchange (FX) positions, NSFR etc., which are always conservative compared to the prevalent Regulatory requirements.

The Bank manages liquidity based on current and forecasted movements in deposits, loans and other related portfolios including off Balance Sheet exposure based on demand, contractual commitments and customer behaviors. This is achieved by (i) adhering to Board approved loan to deposit guidelines (ii) adherence to regulatory mandated liquidity mismatch guidelines with respect to the amount of potential projected cash outflow, looking out one month, as a percentage of total deposits and (iii) maintaining holdings of high quality liquid assets and short maturity interbank placements.

Currently the Bank maintains a portfolio of high quality and liquid assets in the investment portfolio with more than 50% of the portfolio made up of US Treasuries. The Bank's LCR which is a measure of liquidity is above 130% reflecting the very conservative liquidity policy. NSFR for the past few quarters has been around 140% with a Loan/Deposit ratio of around 60%. As at March 31st, 2025, the Bank holds cash and investments worth approx. BMD $593 million which is 42.30% of its total Balance Sheet size and 47.54% of its deposit obligations.

The Bank has a formalized and Board approved liquidity contingency plan which highlights the roles and responsibilities and actions to be taken in five stages i) business-as-usual, ii) mild stress, iii) moderate stress, iv) severe stress, and v) adverse stress. This includes events with liquidity crises that can impact the Bank's funding and liquidity position severely.

As part of the annual Capital Assessment and Risk Profile (CARP), the Bank uses the BMA LCR calculations as a base for a stress scenario. The LCR retention ratios on both cash inflows and cash outflows are intended to reflect a 'Stressed Liquidity Event'. The Bank further stresses these factors by a further 25%.

The Bank relies mainly on customer deposits as a funding source, which has been steady and stable historically. Notwithstanding the continued stability of the Bank's deposit funding, the Bank has established external repurchase facilities as a contingency funding plan. The Bank maintains a very sound investment portfolio consisting of US Treasuries and high-quality corporate bonds, which places the Bank in a good position to raise necessary funding in a very short timeframe to meet any adverse liquidity conditions. Acquisition of the Bank's holding company by NCB Financial Group in December 2017 also provides the Bank with additional avenues of support from its affiliate banking institution in Jamaica, National Commercial Bank Jamaica, should such adverse conditions occur.

The Bank operates only in Bermuda and does not have any foreign branches or operations. The Bank transacts only a small number of FX positions, predominantly spot transactions for customer flow. As a result the Bank has no substantial net exposure to foreign exchange rate fluctuations.

Liquidity profile of the Bank's Liabilities as at March 31st, 2025 is as follows:

	Carrying amount	Gross nominal	Repayable on demand	Up to 3 mnths	3-6 mths	6-12 mths	1-5 yrs	>5 yrs
Total Due to Depositors	1,236,688	(1,263,461)	(864,100)	(80,832)	(90,912)	(138,012)	(89,605)	-
Accrued Interest	11,293							
Accts Payable & Accrued Liabilities	980	(980)	(980)	-	-	-	-	-
Due to Clients	6,363	(6,363)	(6,363)	-	-	-	-	-
Lease Liabilities	6,273	(7,877)	-	(243)	(243)	(482)	(2,854)	(4,055)
Total	**1,261,597**	**(1,278,681)**	**(871,443)**	**(81,075)**	**(91,155)**	**(138,494)**	**(92,459)**	**(4,055)**
Unrecognized Loan Commitments	-	(32,335)	(11,851)	-	-	-	(11,155)	(9,329)
LOC	-	(2,139)	-	(301)	(838)	(1,000)	-	-
Total Financial Liabilities	**1,261,597**	**(1,313,155)**	**(883,294)**	**(81,376)**	**(91,993)**	**(139,494)**	**(103,614)**	**(13,384)**

Please Note: We have excluded Deferred Income because this is not considered as a financial liability.

8.1 Liquidity Coverage Ratio (LCR)

Please see below LCR details based on the past 6 months data. Please note the following:

- The Bank has an LCR ratio of 176% reflecting a very healthy liquidity position.
- The Bank's HQLA is comprised predominantly of US sovereign debt and high-quality liquid investments.
- There are no significant intra period movements.
- The Bank's main source of funding continues to be customer deposits.
- The Bank has insignificant foreign currency exposure and hence a currency mismatch is not material.
- The Bank has captured all the relevant cash flows for this calculation.

Currently the Bank does not have any borrowings from capital markets or wholesale funding sources, hence there are no concentration limits on funding sources or collateral pools.

	LIQ1	a Total unweighted value (average)	b Total weighted value (average)
High-quality liquid assets			
1	Total HQLA		391,026
Cash outflows			
2	**Retail deposits and deposits from small business customers, of which:**	**353,333**	**35,333**
3	Stable deposits	-	-
4	Less stable deposits	353,333	35,333
5	**Unsecured wholesale funding, of which:**	**396,652**	**248,610**
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-
7	Non-operational deposits (all counterparties)	396,652	248,610
8	Unsecured debt	-	-
9	**Secured wholesale funding**		-
10	**Additional requirements, of which:**	**37,852**	**3,857**
11	Outflows related to derivative exposures and other collateral requirements	-	-
12	Outflows related to loss of funding of debt products	-	-
13	Credit and liquidity facilities	37,852	3,857
14	**Other contractual funding obligations**	**2,179**	**109**
15	**Other contingent funding obligations**	**5,618**	**5,618**
16	**TOTAL CASH OUTFLOWS**		**293,527**
Cash inflows			
17	Secured lending (eg reverse repo)	-	-
18	Inflows from fully performing exposures	12,361	6,181
19	Other cash inflows	59,116	59,116
20	**TOTAL CASH INFLOWS**	**71,477**	**65,296**
			Total adjusted value
21	**Total HQLA**		**391,026**
22	**Total net cash outflows**		**228,231**
23	**Liquidity coverage ratio (%)**		**171%**

8.2 Net Stable Funding Ratio (NSFR)

The NSFR requires banks to maintain a stable funding profile in relation to the composition of their assets and Off-Balance Sheet activities, looking over a one-year horizon. The BMA requirement is 100% coverage.

Please see below NSFR workings based on March 31st, 2025.

- The Bank has an NSFR ratio of 131%.
- Customer deposits continue to be the main source of funding for the Bank.
- The Bank has a very simple Balance Sheet comprising of deposits and loans and does not have any significant amount of interdependent assets/liabilities.

LIQ2		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity*	<6 months	6 months to <1 year	≥1 year	
Available stable funding (ASF) item						
1	**Capital:**	-	-	-	**153,038**	**153,038**
2	Regulatory capital	-	-	-	153,038	153,038
4	**Retail deposits and deposits from small business customers:**	-	**566,060**	**121,052**	**87,324**	**705,725**
5	Stable deposits	-	-	-	-	-
6	Less stable deposits	-	566,060	121,052	87,324	705,725
7	**Wholesale funding:**	-	**438,295**	**13,305**	**18,613**	**118,161**
8	Operational deposits	-				
9	Other wholesale funding	-	438,295	13,305	18,613	118,161
11	**Other liabilities:**	-	-	-	-	-
13	All other liabilities and equity not included in the above categories	-	18,157	352	5,576	5,752
14	**Total ASF**					**982,676**
Required stable funding (RSF) item						
15	**Total NSFR high-quality liquid assets (HQLA)**					**39,049**
16	**Deposits held at other financial institutions for operational purposes**	**107,299**	-	-	**5,450**	**59,100**
17	**Performing loans and securities:**	**11,778**	**65,208**	**32,402**	**680,592**	**548,288**
19	Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions	-	-	-	-	-
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and PSEs, of which:	11,775	63,768	26,709	-	46,517
21	With a risk weight of less than or equal to 35% under the Basel II standardised approach for credit risk	-	1,080	72.00	353,105	270,666
22	Performing residential mortgages, of which:	-	-	-	-	-
23	With a risk weight of less than or equal to 35% under the Basel II standardised approach for credit risk	-	360	5,621	251,253	166,305
24	Securities that are not in default and do not qualify as HQLA, including exchange-traded equities	2	-	-	76,234	64,800
26	**Other liabilities:**	-	**24,318**	**3,090**	**72,948**	**100,355**
27	Physical traded commodities, including gold	-				-
31	All other assets not included in the above categories	-	24,318	3,090	72,948	100,355
32	**Off-balance sheet items**		-	-	**73,236**	**1,617**
33	**Total RSF**					**748,409**
34	**Net Stable Funding Ratio (%)**					**131%**

*Items to be reported in the "no maturity" time bucket do not have a stated maturity. These may include, but are not limited to, items such as capital with perpetual maturity, non-maturity deposits, short positions, open maturity positions, non-HQLA equities and physical traded commodities.

9. Market Risk

Market risk is the potential adverse change in the Bank's income or in the value of the Bank's holdings of financial instruments arising from movements in interest rates, foreign exchange rates or equity prices. The objective of market risk management is to manage and control market risk exposure within acceptable parameters, while optimizing the return on risk.

The Bank's exposure to market risk is governed by a policy approved by the ALCO and ratified by the Risk Committee. The policy sets out the nature of risk which may be taken, and applicable maximum risk limits. Compliance with the Bank's risk limits and the Bank's exposure to market risks are reviewed at monthly meetings of ALCO and quarterly meetings of the Risk Committee. Since the Bank does not engage in propriety trading activities, its market risk exposure principally arises from its regular banking activities.

Day-to-day monitoring and management of market risk is undertaken by the Treasury Department. Exposure to market risk can be managed by using hedging instruments or by utilizing natural hedges existing within the variety of financial instruments the Bank holds.

The Bank has submitted a policy statement to the BMA declaring its activities as non-trading and has obtained a *de minimis* exemption from holding market risk capital due to the nature of its operations.

9.1 Interest Rate Risk

Qualitative Disclosures of IRRBB

This section contains qualitative disclosures providing a description of the risk management objective and policies concerning IRRBB.

a) Definition of IRRBB for the purposes of risk control and measurement.

The Bank defines IRRBB as Risk of losses, or reduced income, due to timing mismatches in the sensitivity of the Banks assets and liabilities to interest rate movements within the Banking Book.

A sufficiently high level of IRRBB could pose a significant threat to the Bank's capital and/or future earnings if not managed appropriately. Changes in interest rates can affect both the underlying economic value of the Bank's assets, liabilities and off-Balance Sheet instruments and its net interest income.

IRRBB comprises:

Repricing risk (mismatch risk) - timing difference in the maturity and repricing of bank assets, liabilities and off-Balance Sheet positions.

Basis Risk - imperfect correlation in the adjustment of the rates earned and paid on different instruments with otherwise similar repricing characteristics.

Option Risk – the risk related to interest-related options embedded in Bank products. Such embedded optionality may exist, where the Bank or its customers can make elections such as prepayment of a loan or early redemption of a deposit that alter the timing and amount of their cash flows.

b) The Bank's IRRBB management and mitigation strategies.

IRRBB is managed within the Bank's market risk framework. The Board of Directors retains ultimate responsibility for the effective management of IRRBB. Through the Risk Committee the Board has delegated its responsibility for the management of IRRBB to ALCO. At management level, the Bank's ALCO proactively oversees the management of IRRBB.

The appropriate risk limits have been established, managing a robust risk control and reporting process. Both economic value (EVE) and earning based measurements are used to measure IRRBB and monitor this risk against the limits. Compliance with these limits is measured and reported to ALCO and the Board.

ALCO's functions include: reviewing the framework to identify, measure, evaluate, control and monitor IRRBB in the Bank's Balance Sheet.

Hedging – The Bank primarily maintains its risk position within the desired levels through adjustments to balance composition and does not intend as a matter of normal course to fully hedge the interest rate risk. However, if or when a hedge is concluded to be executed the proper documentation is maintained and accounting is done as per relevant IFRS standards.

Conduct of Stress Testing – The Bank currently conducts stress tests for net interest income variation, by assessing the impact of various interest rate shocks on the Bank's earnings. In addition, EVE stress tests are required by the Basel Committee's guidelines which have been adopted by the Bank.

Model Validation – The Bank has an established model validation framework that covers IRRBB models. All new models and any revisions to existing models will be presented to ALCO for approval.

The role of independent audit – Internal Audit function is responsible for periodically reviewing the robustness of the IRRBB management framework by assessing the reliability of reporting effectiveness and efficiency of the IRRBB policy and framework.

c) The Periodicity of the calculation of the Bank's IRRBB measures.

The Bank undertake its IRRBB measurement on a monthly basis during the normal course of business. The Bank employs various analytical techniques to measure interest rate sensitivity monthly within the Banking Book on both an earnings and economic-value basis. This includes an interest rate repricing profile analysis, a simulated modelling of the Bank's earnings at risk and economic value for a standard interest rate shock, and stress testing of earnings and economic value for multiple stressed interest rate scenarios. These analyses include the application of both parallel and non-parallel interest rate shocks.

Earnings Approach (Earnings at risk): This is defined by the impact of changes in interest rate on the Bank's earnings. This is measured by changes in net interest income assuming a constant Balance Sheet, where maturing or repricing cash flows are replaced by new cash flows with identical features with regards to amount, repricing period and spread components.

Economic Value Approach (EVE): EVE sensitivity is computed with the assumption of a run-off Balance Sheet, where the existing interest sensitive positions in the Banking Book are amortized based on their repricing cash flow and are not replaced by any new business. EVE measures the change in the present value of the assets and liabilities. The measure therefore depicts the change in economic equity resulting from an interest rate shock.

d) Interest rate shock and stress scenarios.

The Bank has applied the six interest rate shock scenarios as prescribed in the Basel guidance (namely parallel up, parallel down, short rate up, short rate down, flattener and steepener).

While all scenarios are applied for Δ EVE computations, only the parallel shocks are utilized to compute the Δ NII using the income approach.

e) Modelling assumptions.

The modelling assumptions used in the Bank's IRRBB report have been adopted for internal capital adequacy purposes from 1st January 2018.

f) IRRBB hedging.

The Bank does not fully hedge interest rate risk but targets to maintain its IRRBB position at a desired level, within the risk appetite, through strategic planning of Balance Sheet composition including an appropriate tenor and repricing mix of fixed and floating rate products.

Within the Bank's ALCO policies, Treasury is permitted from time to time to carry out fair value and cash flows hedges to hedge interest rate risk on particular assets and liabilities in order to maintain risk and return parameters within appetite and plan. Currently there are no such hedges.

g) Key modelling assumptions.

The modelling assumptions considered for the computation of Δ EVE and Δ NII:

- For Δ EVE commercial margins and other spread components have been included in the cash flows used in the computation and discount rate.

- Non-maturity deposits (NMD's) have been split in Retail and Wholesale deposits. The Bank has adopted the results of the non-maturity deposit study developed by an external service provider. The behavioural analysis study was based on historical data to establish set levels of core, non-core and non-stable deposits. For both Retail and Wholesale NMDs identified as non-stable, these have been taken to reprice in the overnight bucket, and core deposits have been assigned the longest repricing maturity between 8 to 10 years with an average life of 4 to 5 years.

- Management has conducted a historical analysis on the level of fixed rate loan prepayments experienced over a five-year historical period (2018-2023) up to 31st December 2023. Given the low value result of the analysis, Management has deemed this risk immaterial to the IRRBB model and will continually assess the risk going forwards.

- The Bank has significant currency exposure in base currency, BMD and also USD (which is pegged to the Bermuda Dollar). Exposures in all foreign currencies (FCY) are immaterial as they are less than 5.0% of assets and liabilities. The Bank has included FCY exposures in the base currency with the conversion rate as on the reporting date. Accordingly, significant interest rate correlations between different currencies are not applicable for the Bank's current portfolio.

Quantitative Disclosures of IRRBB

BMD $'000	Δ EVE*		Δ NII**	
Period	**Mar-25**	**Dec-24**	**Mar-25**	**Dec-24**
Parallel up	(6,511)	(5,425)	1,798	2,085
Parallel down	7,933	6,792	(2,832)	(2,467)
Steepener	(4,307)	(4,901)		
Flattener	2,765	3,592		
Short rate up	(410)	790		
Short rate down	556	(736)		
Maximum	(6,511)	(5,425)	(2,832)	(2,467)
Period	**Mar-25**		**Dec-24**	
Tier 1 Capital	**152,439**		**157,148**	

*Δ EVE: Change in Economic Value of Equity due to interest rate shocks

**Δ NII: Change in Net Interest Income due to interest rate shocks

***IRRBB disclosures are on Solo basis

With most of the Loan book being variable in nature, Bank's Balance Sheet is more sensitive to Asset book rather than Deposit book, which contains both variable and fixed rate liabilities. The Bank's strategy is to continue to closely monitor the duration of the investment book, to ensure the Bank is sufficiently hedged against the sensitivity to a – 200 bps shock scenario.

Loan disbursements with corresponding sale and maturing T-bills, interbank and investments plus movements in the deposit mix contribute to the movements in both EVE and NII.

10. Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. It arises in Clarien's day-to-day operations and is relevant to every aspect of its business.

Clarien has established a robust framework of processes, systems and authority structures to minimize its exposure to operational failures of this kind. This includes:

- The development of an operational risk taxonomy which establishes thirteen sub-categories of risk that Clarien will manage, monitor and mitigate through its operational risk management program.
- The publication of a comprehensive framework of policies and procedures to inform and guide employees as they execute their roles and responsibilities in respect of these risks.
- A commitment to competence through the provision of both technical and soft skills training.
- The implementation of cascading authority structures, separations of duties and maker-checker rules.
- The implementation of systems and processes that capture and enable the interrogation of operational losses, customer complaints, and other "near miss" incidents. This includes the reporting of any loss incurred for an amount of $10,000 or more to the Risk Review Committee which oversees the sufficiency of the corrective actions taken by management to prevent recurrence.
- The completion of independent testing and quality assurance processes to confirm the performance of key controls.
- A change management risk assessment process to ensure projects do not cause serious disruption or create processing inefficiencies.
- Processes that monitor the resiliency of critical I.T. systems, including the readiness of Clarien's business continuity and disaster recovery capabilities.
- The monitoring of material outsourcing and vendor relationships.

10.1 Capital Calculation Methodology

The Bank has adopted the Revised Standardized Approach for calculating its Pillar 1 operational risk capital which is based on Basel's revised operational risk standard which came into effect starting 1st January 2023. This approach consists of two main items, a business indicator component (BIC) (a measure of a bank's income) and a loss component (LC), from which an internal loss multiplier (ILM) is derived, a measure of a bank's historical losses. The minimum (pillar 1) operational risk capital (ORC) requirement is the product of the BIC and the ILM, with risk weighted assets for operational risk being the capital requirement multiplied by 12.5.

CLARIEN

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Clarien Bank Limited, through its wholly owned subsidiary companies, is licensed to conduct bank, investments, corporate services and trust business by the Bermuda Monetary Authority.