



PILLAR III DISCLOSURE REPORT

Report reference date: 31st December, 2021

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Abbreviations

ALCO	Asset and Liability Management Committee
ALMM	Additional Liquidity Monitoring Metrics
AMA	Advanced Measurement Approach
AT1	Additional Tier 1 capital
AVA	Additional Value Adjustment
BB	Banking Book
BCBS	Basel Committee on Banking Supervision
BPV	Limits Basis Point Value
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CCS	Cross Currency Swaps
CET1	Common Equity Tier 1
CPV	limits Credit Point Value
CRM	Credit Risk Mitigation
CRO	Credit Operations Division
CRR	Capital Requirement Regulation
CVA	Credit Valuation Adjustment
EAD	Exposure At Default
EBA	European Banking Authority
ECAI	External Credit Assessment Institution
EU	European Union
FS	Financial Statements
FV	Fair Value
FuVA	Funding Value Adjustment
FVA	Fair Value Adjustment
FX	Foreign Exchange
GL	Guideline
G-SII	Global Systemically Important Institution
HLA	High Liquidity Assets
ICAAP	Internal Capital Adequacy Assessment Process
IFRS	International Financial Reporting Standards
IRB	Internal Rating based Approach

IRRBB	Interest rate risk in the banking book
IRS	Interest Rate Swap
KRI	Key Risk Indicators
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
LR	Leverage Ratio
LWL	Limits Loss Warning Level
MB	Management Board
MDB	Multilateral Development Banks
MR	Market Risk
MtM	Mark to Market
NBR	National Bank of Romania
NII	Net Interest Income
NPL	Non-performing Loans
NSFR	Net Stable Funding Ratio
O-SII	Other Systemically Important Institutions
PD	Probability of Default
PSE	Public Sector Entities
REPO	Reverse Repo
RWA	Risk Weighted Assets
STA	Standardized Approach
SB	Supervisory Board
SFT	Securities Financing Transactions
SME	Small and medium sized enterprises
SREP	Supervisory Review and Evaluation Process
SVaR	Stressed VaR
T2	Tier 2 capital
TB	Trading Book
VaR	Value at Risk

1. OVERVIEW ON DISCLOSURES

The Report is prepared in accordance with National Bank of Romania Regulation no. 5/2013 regarding prudential requirements for credit institutions, Regulation no. 575/2013 of European Parliament and Council dated 26.06.2013 regarding prudential requirements for credit institution and investment companies, with subsequent amendments and connected regulatory requirements as National Bank of Romania Regulation no. 11/2020, Regulation no. 876/2019 of European Parliament and Council.

The information disclosed is compliant with the COMMISSION IMPLEMENTING REGULATION (EU) 2021/637 of 15 March 2021, laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council and repealing Commission Implementing Regulation (EU) No 1423/2013, Commission Delegated Regulation (EU) 2015/1555, Commission Implementing Regulation (EU) 2016/200 and Commission Delegated Regulation (EU) 2017/2295 and with the dedicated Guidelines issued by European Banking Authority and Basel Committee:

- EBA/GL/2014/14 Guideline on materiality, proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013;
- EBA/ITS/2020/04 Technical Standards on Pillar III that implements changes introduced in the CRR2;
- EBA Guidelines EBA/GL/2020/07 on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis;

The document is available in electronic format at www.unicredit.ro, area Financial Reports, Basel II-Pillar III Disclosure, in the following location:

<https://www.unicredit.ro/en/institutional/the-bank/financial-reports.html#baseliipillariiidisclosure>

The quantitative data are presented on consolidated basis, except those flagged at individual level, and in RON equivalent, except those flagged in other currencies.

As the UniCredit Bank Romania has been identified as “Other Systemically Important Credit Institution (O-SII)” from Romania, the Bank will provide the users with quarterly frequency a relevant bucket of information.

The Pillar III Report is approved by the Supervisory Board of UniCredit Bank Romania.

When assessing the disclosure requirements in accordance with Regulation (UE) No 575/2013 and 637/2021 Guideline regarding the disclosure requirements as the 8th part of Regulation (UE) No. 575/2013, the Bank considers the following requirements as not applicable:

Area	Regulation (EU) no 575/2013 article reference	Disclosure template	Reason for not disclosure
Use of Internal Market Risk Models	455	EU MR2-A – Market risk under the IMA (Internal Modal Approach)	UniCredit Bank does not apply an internal model approach for the calculation of market risk capital requirements
	445 & 455	EU MR2-B – RWA flow statements of market risk exposures under the IMA	UniCredit Bank does not apply an internal model approach for the calculation of market risk capital requirements
	445 & 455	EU MRB – Qualitative disclosure requirements for institutions using the IMA	UniCredit Bank does not apply an internal model approach for the calculation of market risk capital requirements
	445 & 455	EU MR3 – IMA values for trading portfolios	UniCredit Bank does not apply an internal model approach for the calculation of market risk capital requirements
	445 & 455	EU MR4 – Comparison of VaR estimates with gains/losses	UniCredit Bank does not apply an internal model approach for the calculation of market risk capital requirements

Disclosure Report 2021

Area	Regulation (EU) no 575/2013 article reference	Disclosure template	Reason for not disclosure
Capital requirements	438	EU INS1 – Non-deducted participations in insurance undertakings	As at December 31, 2021, UniCredit Bank does not have participations in insurance undertakings
Exposure to counterparty credit risk	439	EU CCR8 – Exposures to CCPs	As at December 31, 2021, UniCredit Bank does not have exposures to CCPs
		EU CCR6 – Credit derivatives exposures	As at December 31, 2021, UniCredit Bank does not have credit derivatives exposures
Use of credit risk mitigation techniques	453	EU CR7 – IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques	As at December 31, 2021, UniCredit Bank does not use credit derivatives used as CRM techniques
Indicators of global systemic importance	441		UniCredit Bank has not been identified as global systemically important institutions (G-SIIs)
Securitization		SECA – Qualitative disclosure requirements related to securitization exposures	UniCredit Bank does not perform securitization transactions
		SEC1 – Securitization exposures in the banking book	UniCredit Bank does not perform securitization transactions
		SEC2 – Securitization exposures in the trading book	UniCredit Bank does not perform securitization transactions
		SEC3 – Securitization exposures in the banking book and associated regulatory capital requirements – bank acting as originator or as sponsor	UniCredit Bank does not perform securitization transactions
		SEC4 – Securitization exposures in the banking book and associated capital requirements – bank acting as investor	UniCredit Bank does not perform securitization transactions
Overview of risk management, key prudential metrics and RWA		KM2 – Key metrics – TLAC requirements (at resolution group level)	UniCredit Bank has not been identified as global systemically important institutions (G-SIIs)

2. GENERAL INFORMATION RELATED TO RISK MANAGEMENT, OBJECTIVES AND POLICIES

2.1 Strategies and processes of risk management

Risk management objectives are correlated with the Banks' general strategic objectives:

- Adequate and prudent management of risks and in particular of significant risks;
- Selective enlargement of the loan book, by achieving a balanced structure on client segments;
- Products' diversification;
- Conservation of a sustainable profitability threshold;
- Mitigation – to the possible extent – of the unpredictability and uncertainty of the legal framework related to the financial-banking system;
- Identification of optimal solutions tailored to clients' financing needs;
- Adequate training of the personnel, so that they may offer high quality services to customers;
- Local integration of the existent standards at the group's level under the form of internal regulations and procedures.

The strategic objectives on significant risk management are achieved through the following:

- Definition and setting of basic principles and respective limits regarding risk management;
- An organizational structure specialized in management and control of risks;
- Specific strategies and techniques for risk measuring, assessing, monitoring, diminishing and reporting.

One of the key risk management tools used by the Bank represents stress testing. The aim of stress testing is to assess the Bank's viability with respect to exceptional but plausible events. The impact of certain macro-or micro-economic scenarios is assessed on the capital position (solvency stress test) and/or the liquidity position (liquidity stress test) of the Bank.

The stress tests have both regulatory and managerial purpose. They are used as a managerial tool to assess the capital and liquidity soundness and set potential action plans or risk mitigation actions.

Stress testing program is an integrated part of the Bank's risk management framework, being supported by an effective infrastructure to perform stress tests depending on the nature, scale and complexity of the activities and also depending on the Bank risk profile.

The management body has the final responsibility for the credit institution's overall stress testing program.

The Bank uses stress testing results as a diagnostic tool to set up their risk appetite and as a forward-looking tool within the internal capital adequacy assessment process - for example, to assess how the profits are affected by crisis situations, for internal assessment of capital adequacy, or for risk assessment in an anticipatory measure.

In general a capital stress test assumes possible but uncertain scenarios, based on assumptions of the development of the capital market. This leads to different effects and impact on the Capital components. It shows whether the Bank is able to stay over the regulatory minimum of Capital requirement under adverse conditions.

The stress tests are applied to all types of risk considered tangible and quantifiable within the Bank, such as: credit risk, operational risk, market risk, business risk and real estate risk. The purpose of these simulations is to assess the Bank's vulnerability to exceptional, but plausible crisis events that could influence the Bank's performance.

The methodology for stress tests is established centralized at the UniCredit Group level and is running based on scenarios defined at the Group level and adapted to the local conditions.

The 2021 stress tests were conducted over a 3-year horizon, based on two macroeconomic scenarios that took into account the systemic and specific changes that might materialize, both presently and in the near future. Thus, crisis simulations provide a perspective picture of a possible evolution of the Bank in case the adverse scenarios materialize.

2.2 Structure and Risk Management organization

The risk management framework enables Bank to assess and manage risks in a proportional and consistent manner across the institution, at individual and sub-consolidated level, encourages an open and transparent culture where risks discussion and awareness are supported and encourages an understanding of the risk environment within the Bank, at individual and sub-consolidated level.

The Bank's risk management framework includes all business lines and internal units, including internal control functions, with full recognition of the economic substance of all its risk exposures and allows making informed decisions on risk-taking.

The risk management framework is implemented, enforced and maintained through strategies, policies, procedures, risk limits and risk controls ensuring adequate, timely and continuous identification, measurement or assessment, monitoring, management, mitigation and reporting of the risks at the business line, credit institution and consolidated or sub-consolidated levels.

The Bank developed a solid risk culture at all Bank's levels and business lines. UniCredit Bank established a comprehensive and independent risk management function, covering the whole Bank, under direct supervision of the management body, having personnel with relevant experience, adequate to the Bank's risk appetite, and able to play a significant role in the processes of identification, measurement and assessment of risks. The risk management function also have responsibilities with regard monitoring and approval of internal rating systems and risk assessment models, including validation of such, and risk analysis for new products and exceptional transactions.

The risk management function, together with compliance function, act as second line of defence and ensure effective and efficient operations, adequate control of risks, prudent conduct of business, reliability of finance and non-financial reported information, both internally and externally, and compliance with laws, regulations, supervisory requirements and the Bank's internal policies and procedures.

Risk management function is realized within the Bank mainly through the entities from Risk (CRO) Division and through certain entities within CFO Division.

Aside from the day to day responsibility of the entire personnel related to risk management, the risk management framework implementation and adequate adjustment of it, when the case, including the implementation of the Strategy for the management of significant risks at Bank's individual and sub-consolidated view, is supported, at decisional and consultative levels, by the relevant committees set up at Bank level, but especially by:

- Risk Management Committee (RMC) organized at the Supervisory Board level

The Risk Management Committee is a permanent committee, directly subordinated to the Supervisory Board, which advises the members of the Supervisory Board in regard with specific domains in order to document de decisions that will be taken by the Supervisory Board, evaluates and transmits to the Supervisory Board recommendations on the assigned attributions and facilitates the development and implementation of a solid framework for internal governance/activity management.

- Risk Management Operative Committee (RMOC) organized at the Management Board level

The Risk Management Operative Committee acts for the identification, evaluation, and management of significant risks according to the provisions of the Organization and Functioning Regulation of the Bank and to its specific Functioning Regulation, supporting the Management Board, with advisory role, in the risk management process.

During 2021, the Risk Management Committee at Supervisory Board level had 4 ordinary meetings and 3 extraordinary meetings and the Operative Risk Management Committee had 4 ordinary meetings.

Risk Division operates as permanent and central organizational structure, with powers and responsibilities for the management of general framework of risks, ensuring that all material risks are identified, measured and properly reported.

This Division shall assist the management body of the Bank in performing the risk management framework related responsibilities, having, as appropriate, direct access to the Supervisory Board and its committees, in particular to the Risk Management Committee. The risk management function also has adequate access to all business lines and other internal units that have the potential to generate risk, as well as to relevant subsidiaries and affiliates of the Bank, acting as group risk management function in regards to the Bank's subsidiaries.

The risk management function must provide relevant independent information, analyses and expert judgment on risk exposures, and advice on proposals and risk decisions made by business lines or internal units, and must inform the management body as to whether they are consistent with the credit institution's risk appetite and strategy. The risk management function may recommend improvements to the risk management framework and corrective measures to remedy breaches of risk policies, procedures and limits.

2.3 The internal control framework

The internal control framework is based on the 3 lines of defence model:

- The first line of defense is represented by the risk management processes established in the Bank in order to identify, measure or assess, monitor, manage and report risks. Risk management responsibilities are not confined to risk specialists or control functions, as each Bank's employee has to be fully aware of his/her own responsibilities with regards to risk management. Business units are primarily responsible for managing risks on a day-to-day basis, taking into account the Bank's risk tolerance/appetite and in line with internal policies, procedures and controls.
- The second line of defense is represented by risk management and compliance functions, that ensure effective and efficient operations, adequate control of risks, prudent conduct of business, reliability of financial and non-financial information reported, both internally and externally, and compliance with laws, regulations, supervisory requirements and the Bank's internal policies and procedures.
- The third line of defense is represented by internal audit function, which ensures an independent assessment of the compliance of all activities and business units of the Bank (including the risk management function and compliance function) with its policies and procedures. The internal audit function also assesses whether existing policies and procedures remain adequate and comply with legal and regulatory requirements.

Internal control framework covers the overall Bank organization, including the activities of all business, support and control units.

Internal control function within the Bank includes the following independent specific control functions:

- Risk management function
- Compliance function

- Internal audit function

2.4 Risk management and internal control in UniCredit Bank subsidiaries

UniCredit Consumer Financing

The Supervisory Board is responsible for the set up and keeping of a proper and effective internal control system.

The Management Board is responsible for implementing the strategy and the policies on risk management as established and defined in the Article of Association and the Internal Governance Rules.

For the support of the risk management activities, specialised committees are set-up within the financial institution: Audit Committee, Risk Management Committee and Credit Committee.

Risk and Collection Division operates as a permanent organizational structure, with responsibilities related to the administration of the general framework of risk management. The Risk Division offers support to the Risk Management Committee and the company's management through the current monitoring of the credit risk.

The Finance and Planning Division offers support to the Risk Management Committee and the company's management through the current monitoring of the market and liquidity risk.

Marketing and Product Development Department offers support to Risk Management Committee and the company's management through the current monitoring of the reputation risk.

Operational risk is managed by all the departments whose activities incur operational risks.

The monitoring is ensured by operational risk function through regular assessment of the operational risk indicators and through the assessment and interpretation of the operational risk events. The internal control function has also the mission to strengthen the internal control system by continuous tests and verifications.

Risk management function is supported at company level by other specialized committees (Discipline Committee, Norms and Procedures Committee, Projects Committee, Product and Pricing Committee, Business Continuity and Crisis Management Committee, etc.).

UniCredit Leasing Corporation

The Supervisory Board approves the company's credit risk strategy, which is monitored on a periodical basis.

The Board of Directors is responsible for implementing the strategy and the policies on risk management.

Risk Management Committee is a permanent committee and has the authority to make decisions in matters within its competence, in accordance with the Operational and Organizational Regulations, which manage significant risks, risks with significant impact on the patrimonial and/ or reputational situation of the company (credit risk, market risk, operational risk and reputational risk), as well as the risks associated with outsourced activities.

Audit Committee is responsible to assist the Company's Board in defining and preparing the principles and guidelines governing the entity's entire internal control system, on the basis of a risk-oriented approach, and assessing its effectiveness and efficiency, so that the main risks are properly identified, then measured, managed and monitored, subject to the Board's responsibility for all decisions on this matter.

Credit Committee is responsible for financing granted by UCL and according to established levels of competence in the sense of ensuring the quality of the credit portfolio through the mitigation and limitation of credit risk according to credit granting policy and to specific regulation of the Credit Committee.

The Special Credit Committee is responsible for approval of restructuring and workout cases, IFRS provisioning level for individually assessed clients, according to competencies and the specific regulation

Operational Permanent Work Group Committee is primarily responsible for analysing the operational risk losses, Key Risk Indicators (KRIs) and scenarios in order to identify mitigation actions aiming at reducing operational risk in future.

Reputational Risk Committee represents a unique (non-permanent) forum which, when is the case, analyses and assesses all transaction/initiatives/projects related to specific reputational risk industries and all cases related to activity domains with relevant reputational risks from local perspective. It also ensures awareness and attention regarding the assessment and management of reputational risk.

2.5 Scope and type of reporting and risk measurement system

The aim of the Pillar 2 processes is to enhance the link between the institution's risk profile, its risk management and risk mitigation systems as well as its capital planning.

The Pillar 2 framework can be divided into two major components:

- The first is represented by the Internal Capital Adequacy Assessment Process (ICAAP), under which UniCredit and the Legal Entities; belonging to the scope of application, evaluate their strategies and processes used to assess and maintain, on an ongoing basis, the amounts, types and distribution of internal capital commensurate to their risk profiles, as well as the robustness of internal control arrangements, in order to achieve and sustain a capital level that is adequate to the nature of the institution's business and risks;
- The second consists of the Supervisory Review and Evaluation Process (SREP), performed by the competent ultimate Regulatory Authority, whose key purpose is to ensure that institutions have adequate arrangements, strategies, processes and mechanisms as well as capital and liquidity to ensure a sound management and coverage of their risks to which they are or might be exposed, including those revealed by stress testing and risks institutions may pose to the financial system.

The Internal Capital Adequacy Assessment Process (“ICAAP”) focuses on the development and maintenance of sound internal procedures and systems which allow the evaluation of the Bank capital adequacy, i.e. the balance between the assumed risk (measured in terms of Internal Capital – “IC”) and the available capital (Available Financial Resources – “AFR”), both related to the current situation and in a forward looking perspective, as represented by the budget and strategic plan.

The comparison between AFR and IC is the Risk Taking Capacity (RTC), a key metric included in the Risk Appetite framework.

ICAAP is an integrant part of management and decision-making processes. In this context, the main impacts are related to the risk awareness embedding in the strategic planning and budgeting processes, limit setting and performance evaluation according to a backward and forward-looking perspectives.

Setting up an appropriate capital adequacy process means not only using internally developed metrics, but also setting the appropriate capital levels corresponding to the Pillar 1 metrics, such as the Core Tier 1 (CET1) and Total capital ratios as banks are expected to operate with a capital level higher than minimum requirements (i.e. Regulatory Capital).

The process consists of the following phases:

- Perimeter definition and risk identification and mapping;
- Risk profile assessment and stress testing;
- Risk appetite setting and Capital allocation;
- Monitoring and reporting.

The process of identification and assessment of significant risks is an element of internal control and aims to ensure that internal control objectives are met (efficiency, information and conformity objectives).

UniCredit Bank carries out an analysis by selecting which risks are relevant with reference to its perimeter of activities.

The risk definition and mapping is not a one-off process, but it is done on an on-going basis to improve the risk management framework.

UCB reviews the risk map and classification according to the proportionality principle, at least on an annual base and in case of relevant changes. The risk map is the basis for the risk evaluation and measurement.

Based on the Group's approach and on the internal analysis performed with the Group guidance, in 2021 UniCredit Bank S.A. identified the following significant risks, further described throughout this document:

1. Credit risk
2. Market risk and Interest Rate Risk in the Banking Book (IRRBB)
3. Liquidity risk
4. Operational risk
5. Reputational risk
6. Business risk
7. Real estate risk
8. Strategic risk
9. Risk of excessive leverage.
10. Inter-concentration risk

2.6 Other risks

Other risks considered to have major impact on the bank patrimony are the risks associated with outsourcing activities.

The management of outsourcing activities risk takes into consideration, in a non-exhaustive form:

1. Reputation, operational and financial impact on the Bank that can be generated by the execution/failure to execute accordingly the contract obligations by the supplier;
2. Consequences of outsourcing and their impact upon the assurance of the respect by the Bank of the legal framework and internal regulations framework;
3. Impact upon Bank's clients or upon counterparties in case of default in the execution of contract obligations by the supplier;
4. Analysis of supplier's solvency taking into consideration: reputation, previous experience in the field, quality of services, internal control framework regarding their activities and performance, quality and quantity of resources at the disposal of the supplier for the execution of activities subject to contract, confidentiality of data/ processed transactions etc.;
5. Outsourcing relationships will be governed by contracts; the contracts will include clear provisions regarding the nature of the outsourced activity, the responsibilities of the Bank and of the supplier, as well as activities control tools etc.;
6. For each activity proposed for outsourcing an analysis and opinion will be required from the departments directly involved in risk analysis, such as: Risk Division, Legal and Compliance Department, as well as other units in case the outsourced activity represents their work area;
7. A cost-benefit analysis on outsourced activities is assessed;

8. Degree to which the Bank and the control authorities have access to information, files and databases of the supplier that are a result of the contractual obligations;
9. Back-up plans or measures to remediate crisis situations; they must take into consideration any event that can impose/ force the termination of the contractual relationship and – as the case may be the transfer under optimal circumstances of the activity to another supplier or its takeover by the Bank.

The final responsibility for risks assessment belongs exclusively to the Bank, that critically assesses its risks without relying solely on external valuations.

Both the strategy and significant risk management policies, established at the Bank level, are reviewed periodically.

The Bank has implemented a well-defined and documented reporting framework, including regular and transparent reporting mechanisms, so that the management body and all relevant units within the institution benefit on time by accurate and concise reports, through risk management advisory committees, established by the Bank.

The reports to be submitted to the management body and to the relevant units, and other relevant information related to the identification, measurement or evaluation and monitoring of risks are summarized in the implemented reporting framework.

Bank defines periodically **the risk appetite**, respectively the level of risk that UniCredit Bank is prepared to accept in pursuit of its strategic objectives and business plan, taking into account the interest of its customers (e.g. depositors, policyholders) and shareholders as well as capital and other requirements.

The Management structure reviews and approves the risk appetite on a yearly basis to ensure its consistency with the Group's Strategy, business environment and stakeholder requirements, as defined in the budget process.

Bank regularly monitors the actual risk profile and examines it in relation to the credit institution's strategic objectives and tolerance / risk appetite for assessing the effectiveness of the risk management framework. Evaluation and monitoring of the risk profile is done through indicators established within risk appetite.

2.7 Risk coverage and mitigation policies

The risk mitigation techniques implemented at the Bank level are aimed to reducing the identified risks and limiting their impact on the Bank's performance. Periodically, at the Bank level is monitored the effectiveness of the hedging and mitigating features of risks in order to updating and improving of these techniques to ensure that the objectives set up for each activity are fulfilled as high as possible.

3. SCOPE OF APPLICATION

3.1 Relevant scope of consolidation

The institution subject to disclosure is **UniCredit Bank SA**. (“the Bank” or “UCB”); the report includes Bank’s information and also information regarding the entities integrated in the consolidated prudential perimeter of UniCredit Bank (further described as “the Group”).

Starting August 2015, UniCredit Bank S.A. (the “Bank”) is the new brand name of formerly UniCredit Tiriac Bank SA that was established as a Romanian commercial bank on 1 June 2007 upon the merger by acquisition of the former UniCredit Romania S.A. (the absorbed bank) by Banca Comerciala HVB Tiriac S.A. (the absorbing bank) and is licensed by the National Bank of Romania (“NBR”) to conduct banking activities.

The Bank’s current registered office is 1F, Expozitiei Boulevard, District 1, Bucharest, Romania.

UniCredit Bank S.A. is controlled by UniCredit SpA (Italy), with registered office in Milano (Mi), Italia, Piazza Gae Aulenti 3 Cap 20154 Tower A.

The Bank provides retail and commercial banking services in Romanian Lei (“RON”) and foreign currency for individuals and legal entities. These include: accounts opening, domestic and international payments, foreign exchange transactions, working capital finance, medium and long term facilities, retail loans, bank guarantees, letter of credits and documentary collections, derivative financial instruments.

UniCredit Bank Group is exercising direct and indirect control over the following subsidiaries:

- UniCredit Consumer Financing IFN S.A., having its current registered office at 23-25 Ghetarilor street, 1st and 3rd floor, District 1, Bucharest, Romania, provides consumer finance loans to individual clients. The Bank has a shareholding of 50.1% in UCFIN since January 2013.
- UniCredit Leasing Corporation IFN (“UCLC”), having its headquarters in Ghetarilor Street no. 23-25, 1st, 2nd and 4th floors, Sector 1, Bucharest, Romania, provides financial leasing services to corporate clients and individuals. UCLC, the former associate, has become the Bank’s subsidiary since April 2014 when the Bank gained indirect control of 99.95% (direct control: 99.90%). The Bank’s indirect ownership rate as of 31 December 2019 is 99.98% (direct control: 99.96%) as a result of the merger by absorption of UniCredit Leasing Romania SA (“UCLRO”) by UCLC finalized in June 2015, the date at which UCLRO was absorbed by UCLC.
- Debo Leasing S.R.L., having its current registered office in 23-25 Ghetarilor Street, 2nd floor, 1st district, Bucharest, Romania, is a real estate finance lease entity, that became a subsidiary of the Bank in April 2014. As of December 31, 2019 the Bank has indirect control interest of 99.970% out of which 99.963% through UCLC and 0.0069% through UCFIN.. Considering that Debo’s portfolio contracts expired in May 2021, the company was liquidated during December 2021.
- UniCredit Insurance Broker S.R.L. (“UCIB”), having its current registered office in 23-25 Ghetarilor Street, 2nd floor, 1st district, Bucharest, Romania, intermediates insurance policies related to leasing activities to legal entities and individuals, and became a subsidiary of the Bank beginning with 31 December 2020. The Bank has an indirect controlling interest of 99.98% through UCLC which owns 100% UCIB.

As of 31 December 2021 the Group carried out its activity in Romania through its Head Office located in Bucharest and through its network, having 147 branches (31 December 2020: 148) in Bucharest and in the country .

EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statements categories with regulatory risk categories

This template presents the differences between the accounting and the prudential consolidation perimeter which applies for providing the required information in the eight part of CRR (UE Regulation nr. 575/2013) at consolidated level

	Carrying values as reported in published financial statements (a)	Carrying values under scope of regulatory consolidation (b)	Carrying values of items					
			Subject to the credit risk framework (c)	Subject to the CCR framework (d)	Subject to the securitisation framework (e)	Subject to the market risk framework (f)	Not subject to capital requirements or subject to deduction from capital (g)	
Assets								
Cash and cash equivalents	11,269,110,349	11,269,110,349	5,398,177,552	5,870,932,797	-	-	-	
Of which: Reverse Repo	5,870,932,797	5,870,932,797	-	5,870,932,797	-	-	-	
Financial assets at fair value through profit or loss: Derivatives and Debt Securities	212,594,538	212,594,538	-	33,352,797	-	179,241,741	-	
Financial assets at fair value through profit or loss: Capital Instruments	46,759,634	46,759,634	46,759,634	-	-	-	-	
Derivatives assets designated as hedging instruments	12,248,071	12,248,071	-	12,248,071	-	-	-	
Loans and advances to banks at amortized cost	493,611,663	493,611,663	493,611,663	-	-	-	-	
Loans and advances to customers at amortized cost	33,117,715,848	33,117,715,848	33,117,715,848	-	-	-	-	
Financial assets at fair value through other comprehensive income: Debt Instruments	1,668,986,280	1,668,986,280	1,668,986,280	-	-	-	-	
Of which: Financial assets at fair value through other comprehensive income- Debt Instruments pledged in repo transactions	-	-	-	-	-	-	-	
Financial assets at fair value through other comprehensive income: Capital Instruments	8,429,125	8,429,125	8,429,125	-	-	-	-	
Debt Instruments at amortized costs	7,950,629,413	7,950,629,413	7,950,629,413	-	-	-	-	
Property, plant and equipment	194,583,892	194,583,892	194,583,892	-	-	-	-	
Right of use assets	168,672,836	168,672,836	168,672,836	-	-	-	-	
Intangible assets	300,754,555	300,754,555	72,066,602	-	-	-	228,687,953	
Current tax assets	568,092	568,092	568,092	-	-	-	-	
Deferred tax assets	142,887,721	142,887,721	143,046,561	-	-	-	-158,840	
Other assets	325,316,577	325,316,577	325,316,577	-	-	-	-	
Total assets	55,912,868,594	55,912,868,594	49,588,564,075	5,916,533,665	-	179,241,741	228,529,113	

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*The accounting value according to the prudential accounting perimeter represents repurchase agreements securities.

**Caption "Other Assets" contains "Other Assets" and "Other financial assets at amortized cost" from the IFRS Financial Statements.

***The amounts are rounded to '000 RON in the IFRS Consolidated and Separate Financial Statements, leading to rounding differences as compared to the figures reported above which are in RON.

****Caption "Loans and advances to customers at amortized cost" contains "Loans and advances to customers at amortized cost" and "Net lease receivables" from the IFRS Financial Statements.

	Carrying values as reported in published financial statements (a)	Carrying values under scope of regulatory consolidation (b)	Carrying values of items				
			Subject to the credit risk framework (c)	Subject to the CCR framework (d)	Subject to the securitisation framework (e)	Subject to the market risk framework (f)	Not subject to capital requirements or subject to deduction from capital (g)
Liabilities							
Deposits from banks	666,989,642	666,989,642	-	-	-	-	666,989,642
Loans from banks and other financial institutions at amortized cost	4,170,872,889	4,170,872,889	-	-	-	-	4,170,872,889
Of which: Items in the course of collection due to other banks - repo transactions	-	-	-	-	-	-	-
Deposits from customers	39,815,529,179	39,815,529,179	-	-	-	-	39,815,529,179
Trading portfolio liabilities	32,130,049	32,130,049	-	-	-	-	32,130,049
Financial debts at fair value	-	-	-	-	-	-	-
Derivatives liabilities designated as hedging instruments	66,812,087	66,812,087	-	-	-	-	66,812,087
Debt securities issued	2,491,879,487	2,491,879,487	-	-	-	-	2,491,879,487
Subordinated liabilities	944,182,975	944,182,975	-	-	-	-	944,182,975
Lease liabilities	168,790,054	168,790,054	-	-	-	-	168,790,054
Current tax liabilities	41,467,251	41,467,251	-	-	-	-	41,467,251
Deferred tax liabilities	756	756	-	-	-	-	756
Provisions	220,122,695	220,122,695	-	-	-	-	220,122,695
Other liabilities	749,341,344	749,341,344	-	-	-	-	749,341,344
Total liabilities	49,368,118,408	49,368,118,408	-	-	-	-	49,368,118,408
Total equity	6,544,750,186	6,544,750,186	-	-	-	-	6,544,750,186
Total liabilities and equity	55,912,868,594	55,912,868,594	-	-	-	-	55,912,868,594

*The amounts are rounded to '000 RON in the IFRS Consolidated and Separate Financial Statements, leading to rounding differences as compared to the figures reported above which are in RON.

**Caption "Other liabilities" contains "Other non-financial liabilities" and "Other financial liabilities at amortized cost" from the IFRS Financial Statements.

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

The template provides information regarding the main sources of differences (other than those due to the consolidation perimeter which are presented in the templates UE LI1) between the accounting amounts from the Financial Statements and the exposure values used for regulatory purposes.

Regarding the point 1, the amounts disclosed in columns from b) to e) correspond to the accounting values according to the prudential consolidation perimeter of the balance sheet asset as they were reported in the column c)-f) in the template EU LI1 from this document.

Regarding the point 2, the amounts disclosed in the columns b) and c) correspond to the accounting values according to the prudential consolidation perimeter of the balance sheet liabilities as they were reported in the column c), f) in the template EU LI1 from this document.

Differences due to consideration of provisions disclose the re-integration in the exposure value of specific and general credit risk adjustments (as defined in the Commission Delegated Regulation (EU) No 183/2014) that have been deducted in accordance with the applicable accounting framework. If the carrying amount in the financial statements under the regulatory scope of consolidation has been reduced by elements qualifying as general credit risk adjustments under the aforementioned delegated regulation, these elements have to be re-integrated in the exposure value.

According to the Article 429. (b) CRR, the Bank includes in the exposure amounts the deals SFT computed considering the Article 429, point 5 and the Article 111, point 1 and an increase for the counterparty credit risk according to Article 429 (b), point 2.

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

	Total (a)	Items subject to				
		Credit risk framework (b)	CCR framework (c)	Securitisation framework (d)	Market risk framework (e)	
1	Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)	55,912,868,594	49,588,564,075	5,916,533,665	-	179,241,741
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	-	-	-	-	-
3	Total net amount under the regulatory scope of consolidation	55,912,868,594	49,588,564,075	5,916,533,665	-	179,241,741
4	Off-balance-sheet amounts	20,188,225,836	6,197,150,154	-	-	-
5	<i>Differences in valuations</i>	48,648,547	-	48,648,547	-	-
6	<i>Differences due to different netting rules, other than those already included in row 2</i>	-	-	-	-	-
7	<i>Differences due to provisions</i>	-	-	-	-	-
8	<i>Differences due to prudential filters</i>	-	-	-	-	-
9	<i>Differences due to Derivatives</i>	143,027,119	-	143,027,119	-	-
10	<i>Differences due to SFT</i>	-	-	-	-	-
11	Exposure amounts considered for regulatory purposes	76,292,770,096	55,785,714,229	6,108,209,331	-	179,241,741

* The amount under column b represents the off balance amounts after application of CCF.

EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	
UniCredit Consumer Financing IFN S.A.	Full Consolidation	X				Credit Institution
UniCredit Leasing Corporation IFN S.A.	Full Consolidation	X				Leasing company
UniCredit Insurance Broker S.R.L.	Full Consolidation	X				Insurance broker

3.2 Prudent valuation

The below table contains the additional evaluation adjustments (AVA). The most significant adjustments are related to early termination risk, concentration risk and the closeout cost uncertainty of the government bonds issued by the Romanian Ministry of Finance held in the bank's portfolio.

PV1: Prudent valuation adjustments (PVA)

		Equity	Interest rates	FX	Credit	Commodities	Other	Total pre-diversification	Total after diversification	Of which: In the trading book	Of which: In the banking book
1	Market price uncertainty	-	10,261,018	6,501	1	-	20,829	10,288,349	5,144,175	102,502	5,041,673
2	Mid-market value	-				-					
3	Closeout cost	-	4,889,742	623	560,535	-	104,415	5,555,315	2,777,658	316,045	2,461,613
4	Concentration	-	558,761			-			558,761	-	558,761
5	Early termination	-	-	-	-	-					
6	Model risk	-	-	-	-	-	127,509	127,509	63,754	57,379	6,375
7	Operational risk	-	-	-	-	-					
8	of which: Investing and funding costs								200,265	-	-
9	of which: Unearned credit spreads								52,488	-	-
10	Future administrative costs	-	-	-	-	-	-	-	-	-	-
11	Other	-	-	-	-	-	-	-	-	-	-
12	Total adjustment	-	15,709,521	7,124	560,536	-	252,753	15,971,174	8,544,348	475,926	8,068,422

3.3 Entities deducted from Own Funds

According to Regulation no. 575/2013 of European Parliament and Council dated 26.06.2013 regarding prudential requirements for credit institutions and investment companies, the holdings in Common Equity Tier 1 (CET1) that are classified as significant investments should be deducted from own funds if the CET1-threshold for deduction is exceeded.

As at 31 December 2021, UniCredit Bank doesn't hold at individual level significant investments in financial entities to be deducted from own funds according to the Article 48 from CRR.

3.4 Entities added to RWA

As at 31 December 2021, the significant investments in financial entities are shown at the individual level with a risk weight of 370% as they are not deducted from own funds, but are included in the consolidated perimeter.

3.5 Substantial or legal impediments that hinder the rapid transfer of capital resources within the Group

At UniCredit Group level, an integrated analysis is done to identify the significant risks. The processes for management, monitoring and reporting of risks are formalized in the Group regulations, aligned and integrated at the local group at UniCredit Bank SA level. In accordance with the rules regarding the analysis process, calibration, approval, adoption, implementation, monitoring and reporting of the Group regulations, UniCredit Bank SA has the responsibility of sending the applicable regulation to its subsidiaries, in order to be analyzed, approved/adopted and implemented. Subsequently, UniCredit Bank SA assesses and decides the applicability at the subsidiaries level taking into account the nature, dimension and complexity of their activities.

In order to ensure the control over implementation of the Group requirements at the level of direct controlled entities, there is a frequent reporting process regarding the status of local implementation under the Internal Control Committee of UniCredit Bank SA.

The main potential impediments regarding the rapid transfer of capital resources are addressed below:

3.5.1 The impact of legal status of subsidiaries regarding the prompt transfer of funds and/or debt reimbursement

UniCredit Consumer Finance IFN SA

UniCredit Bank SA (UCB) controls UniCredit Consumer Financing (UCFin) through majority of voting rights held (50.1%), which implies the approval of development plan and strategy of UCFIN in accordance with Bank and UniCredit Group's strategy.

The control exercised over UCFIN is strengthened by the fact that UCB appoints 4 out of 5 members of UCFIN Supervisory Board in accordance with UCFIN Articles of Association („AoA" or Constitutive Act). In Accordance with AoA, the UCFIN Supervisory Board has the authority to check the Board Member's activity in respect of the implementation of the Bank's strategy, aligned with those of UniCredit Group.

As result, there is no impediment which could adversely impact the prompt transfer of funds from UCFIN to UCB and/or the UCFIN capacity for fast reimbursement of debts to UCB.

UniCredit Leasing Corporation IFN SA

UniCredit Bank SA (UCB) controls UniCredit Leasing Corporation IFN S.A. (UCLC) through majority of voting rights held (99.977%), which implies the approval of development plan and strategy of UCLC in accordance with Bank and UniCredit Group's strategy.

The control exercised over UCLC is strengthened by the fact that UCB appoints all 5 members of UCLC Supervisory Board in accordance with UCLC Articles of Association („AoA" or Constitutive Act). In Accordance with AoA, the UCLC Supervisory Board has the authority to check the Board Member's activity in respect of the implementation of the Bank's strategy, aligned with those of UniCredit Group.

As a result, there is no impediment which could adversely impact the prompt transfer of funds from UCLC to UCB and/or the UCLC capacity for fast reimbursement of debts to UCB.

The Articles of Associations of UCFIN and UCLC do not include limitations, restrictions regarding the transfer of own funds and/or debt reimbursement.

3.5.2 Assessment of the other interests, different from those (controlling interests) of UCB and of their impact. UCB capacity to ask for the funds transfers or debt reimbursements

No other interests were identified except the UCB controlling interests as the control is defined in the Articles of Associations of the 2 subsidiaries.

Meanwhile, we mention that the financing agreements concluded between UCB and their subsidiaries contain contractual clauses regarding the situations where repayments in advance can appear and where collateral guarantees are in place, where all actual and future cash amounts are pledged in the bank's favour. (credit balances in the bank accounts open at UCB).

3.5.3 Potential unfavorable fiscal impact for UCB or its subsidiaries in case of funds transfer or debt reimbursement

At UniCredit Bank SA level there is no adverse fiscal impact as a result of the potential prompt transfer of funds or debt repayment in advance in accordance with the Fiscal Code provisions in force. At subsidiaries level, in hypothetical case of share capital distribution, there is no effect that could generate a fiscal impact.

3.5.4 Eventual prejudices could result from the business strategies of subsidiaries regarding the prompt transfer of funds and/or debt reimbursement

The Budget for 2021 and the financial plan for the next 3 years of UCB and its subsidiaries outline the intention of ongoing business activity and to support the implementation of the subsidiaries' strategies. In normal conditions of ongoing business activity, there has not been forecasted any prompt transfer of funds and/or debt repayments in advance in the financial plans.

3.5.5 Analysis of the impact of contractual relationships between the subsidiaries and UCB/other third parties regarding the prompt transfer of funds and/or debts repayment

The contractual relationships between UCB and its subsidiaries are approved and monitored in accordance with the provisions of Articles of Association of subsidiaries and internal procedures which regulates the competencies levels for approval set up by managements and their shareholders.

Taking into account the shareholders structure, there is no negative risk that could impact the contractual business relationships of subsidiaries.

3.5.6 The historical and forecast flows of funds between UCB and its subsidiaries with potential impact on the capacity of prompt transfer of funds and/or debt reimbursement

The loan agreements concluded by UniCredit Bank with its subsidiaries include the calculation of penalty interest in case the loans' payments obligations are not met. The penalty interest is applied at the maturity date, until the full payment date and it is applied to outstanding amount. There have been no cases in the past of penalty interest being applied for the credit lines granted to subsidiaries of UCB.

Meanwhile, we have to mention that, in accordance with the provisions of article 26 of NBR Regulation no.5/2013, UCB, as parent credit institution, takes into account and balance the interests of its subsidiaries and analyzes them continuously in the way those interests contribute to the objectives and interests of UCB Group and respectively of UniCredit Group, taken together as one objective/interest, on a long term basis.

3.5.7 Intragroup Liquidity Transfers

Intra-group liquidity transfers are subject to restrictions due to legal and regulatory constraints. With reference to regulatory requirements, it should be noted that UniCredit Bank is subject to rules provided by the Regulation (EU) No 575/2013 on “prudential requirements for credit institutions and investment firms”.

4. OWN FUNDS AND KEY METRICS

4.1 Regulatory capital - summary and changes over time

Starting with January 2014, the Romanian Banking System is applying the Basel III norms, in accordance with Regulation no. 575/2013 of European Parliament and Council dated 26.06.2013 regarding prudential requirements for credit institutions and investment companies, amended by Regulation (UE) no.648 / 2012 and by Regulation no. 5/2013 regarding prudential requirements for credit institutions issued by National Bank of Romania with subsequent amendments, and connected regulatory requirements.

The prudential requirements define the eligibility criteria for capital instruments which shall be included in Own Funds – Common Equity Tier 1 Capital, Additional Tier 1 Capital or Own Funds – Tier 2 Capital, as detailed below:

Capital instruments qualify as equity instruments Level 1 basic eligibility if the conditions listed below are fulfilled:

- Instruments are issued directly by the institution with the prior approval of shareholders' institution or, where permitted under applicable national legislation governing body of the institution;
- Instruments are paid, and their purchase is not funded directly or indirectly by the institution; are classified as equity within the meaning of applicable accounting framework;
- Instruments are presented clearly and distinctly in the balance sheet in the financial statements of the institution;
- Instruments are perpetual;
- The instruments meet the following conditions in terms of distributions:
 - No preferential treatment in terms of distribution order to perform distributions, including in relation to other instruments Tier 1 instruments and the conditions governing the instruments do not provide preferential rights to making distributions;
 - Distributions to holders of the instruments may be made only items that can be distributed;
 - The conditions governing the instruments do not include a cap or other restriction on the maximum level of distributions;
 - The level of distributions is not determined based on the purchase price of the instruments at issue.
 - The conditions governing the instruments do not include any obligation for the institution to make distributions to their owners, and the institution is not otherwise subject to such obligations;
 - Failure distributions is not an event of default for the institution;
 - Annual distributions do not impose restrictions on the institution.

Capital instruments qualify as equity instruments Level 2 if the conditions for eligibility listed below are fulfilled:

- Subordinated loans are obtained and fully paid;
- Subordinated loans are not issued by a subsidiary or an associate;
- Providing subordinated loans is not funded directly or indirectly by the institution; the principal debt subordinated loans under the provisions governing subordinated loans, is entirely subordinated to the claims of all unsubordinated creditors;
- Subordinated loans have an original maturity of at least five years;

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- Provisions governing, subordinated loans do not include any incentive for their principal amount to be refunded or, if applicable, returned by the institution before maturity;
- Subordinated loans can be recognized in the category of Tier 2 items if in the opinion of the National Bank of Romania meet the eligibility conditions listed above.

The main characteristics of the Level 1 Capital Instruments are detailed below:

Capital Instruments Level 1		
1	Issuer	UniCredit Bank Romania
2	Unique identifier (e.g.: CUSIP, ISIN or Bloomberg identifier for private placement)	n/a
3	Governing law(s) of the instrument	Law-no.31/1990
Regulatory treatment		
4	Transitional CRR rules	CET1
5	Post-transitional CRR rules	CET1
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	solo and consolidated
7	Instrument type (types to be specified by each jurisdiction)	ordinary shares
8	Amount recognized in regulatory capital (in RON thousands)	1,177,748,253
	Currency of issue	RON
9	Nominal amount of instrument - in currency of issue	9.3
10	Accounting classification	shareholder's equity
12	Perpetual or dated	perpetual
13	Original maturity date	no maturity
14	Issuer call subject to prior supervisory approval	yes
15	Optional call date, contingent call dates and redemption amount (s. 9b)	yes
16	Subsequent call dates, if applicable	-
Coupons / dividends		
17	Fixed or floating dividend/coupon	floating
18	Coupon rate and any related index	n/a
19	Existence of a dividend stopper	no
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	discretionary
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	discretionary
21	Existence of step up or other incentive to redeem	no
22	Noncumulative or cumulative	non-cumulative
23	Convertible or non-convertible	no
24	If convertible, conversion trigger(s)	-
25	If convertible, fully or partially	-
26	If convertible, conversion rate	-
27	If convertible, mandatory or optional conversion	-
28	If convertible, specify instrument type convertible into	-
29	If convertible, specify issuer of instrument it converts into	-
30	Write-down features	no
31	If write-down, write-down trigger(s)	-
32	If write-down, full or partial	-
33	If write-down, permanent or temporary	-
34	If temporary write-down, description of write-up mechanism	-
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	subordinated
36	Non-compliant transitioned features	no
37	If yes, specify non-compliant features	-

Tier 2 - Capital Instruments features			
1	Issuer	UniCredit SPA	UniCredit SPA
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	n/a	n/a
3	Governing law(s) of the instrument	Government Emergency Ordinance no.99/2006	Government Emergency Ordinance no.99/2006
Regulatory treatment			
4	Transitional CRR rules	Tier 2	Tier 2
5	Post-transitional CRR rules	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	solo and consolidated	solo and consolidated
7	Instrument type (types to be specified by each jurisdiction)	subordinated loan	subordinated loan
8	Amount recognized in regulatory capital (in RON)	48,500,000	120,000,000
	Currency of issue	EUR	EUR
9	Nominal amount of instrument (aggregate) - in currency of issue	48,500,000	120,000,000
9a	Issue price	48,500,000	120,000,000
9b	Redemption price - in currency of issue	48,500,000	120,000,000
10	Accounting classification	liabilities at amortized cost	liabilities at amortized cost
11	Original date of issuance	27/07/2017	29/12/2017
12	Perpetual or dated	dated	dated
13	Original maturity date	27/07/2027	29/12/2027
14	Issuer call subject to prior supervisory approval	yes	yes
15	Optional call date, contingent call dates and redemption amount (s. 9b)	27/07/2022	29/12/2022
16	Subsequent call dates, if applicable	n/a	n/a
Coupons / dividends			
17	Fixed or floating dividend/coupon	floating	floating
18	Coupon rate and any related index	4.5%+3M EURIBOR	3.88%+3M EURIBOR
19	Existence of a dividend stopper	n/a	n/a
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	n/a	n/a
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	n/a	n/a
21	Existence of step up or other incentive to redeem	n/a	n/a
22	Noncumulative or cumulative	n/a	n/a
23	Convertible or non-convertible	no	no
24	If convertible, conversion trigger(s)	n/a	n/a
25	If convertible, fully or partially	n/a	n/a
26	If convertible, conversion rate	n/a	n/a
27	If convertible, mandatory or optional conversion	n/a	n/a
28	If convertible, specify instrument type convertible into	n/a	n/a
29	If convertible, specify issuer of instrument it converts into	n/a	n/a
30	Write-down features	no	no
31	If write-down, write-down trigger(s)		
32	If write-down, full or partial		
33	If write-down, permanent or temporary		
34	If temporary write-down, description of write-up mechanism		
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	to all other non-subordinated liabilities	to all other non-subordinated liabilities
36	Non-compliant transitioned features	no	no
37	If yes, specify non-compliant features	-	-

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The contractual terms and conditions of the Level 2 Own Funds – Subordinated Loans, according to Art. 437, point 1, C are presented below:

No. cr.	Counterparty	Currency	Amount (principal) original currency	Amount (principal) RON equivalents	Starting date	Maturity Date	Update interest frequency	Clauses	Payments
1	UniCredit SPA	EUR	48,500,000	239,982,850	27-Jul-2017	27-Jul-2027	3 months	without anticipated reimbursement	one
2	UniCredit SPA	EUR	120,000,000	593,772,000	29-Dec-2017	29-Dec-2027	3 months	without anticipated reimbursement	one
	Total		168,500,000	833,754,850					

When IFRS9 standard was implemented, the Group decided not to apply the transitional treatment of expected credit losses.

Starting with the year 2018, the following transitional adjustments do not apply:

- intangible assets;
- unrealized gains and losses from assessing the assets and the liabilities at fair value;
- local filters set up by the National Bank of Romania;
- recognizing in Level 1 Consolidated Own Funds, the instruments and the elements which do not qualify as minority interest.

The structure of the Own Funds (individual and consolidated) as at 31 December 2021 is presented below:

Reference	Item	Group	Bank	Reference for balance sheet
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	1,799,428,752	1,799,428,752	c+d
	of which: Instrument type 1	1,177,748,253	1,177,748,253	c
2	Retained earnings	3,678,472,032	3,177,521,094	i-j
3	Accumulated other comprehensive income (and other reserves)	224,878,996	224,878,996	k+e+f+g+h-l
EU-3a	Funds for general banking risk	111,064,174	111,064,174	l
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-	-	
5	Minority interests (amount allowed in consolidated CET1)	-	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	-	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	5,813,843,954	5,312,893,016	
Total regulatory adjustments to Common Equity Tier 1 (CET1)				
7	Additional value adjustments (negative amount)	8,544,348	8,544,348	
8	Intangible assets (net of related tax liability) (negative amount)	222,165,931	214,686,651	a-b
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	-	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-33,406,640	-33,406,640	
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	-	
15	Defined-benefit pension fund assets (negative amount)	-	-	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-	-	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
EU-25 a	Losses for the current financial year (negative amount)	-	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	10,654,179	10,654,179	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a	Other regulatory adjustments	1,702,127	4,970,819	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	209,659,945	205,449,357	
29	Common Equity Tier 1 (CET1) capital	5,604,184,009	5,107,443,659	
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts	-	-	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	-	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	-	-	

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Reference	Item	Group	Bank	Reference for balance sheet
Additional Tier 1 (AT1) capital: regulatory adjustments				
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-	
44	Additional Tier 1 (AT1) capital	-	-	
45	Tier 1 capital (T1 = CET1 + AT1)	-	-	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	833,754,850	833,754,850	
50	Credit risk adjustments**	91,903,834	95,102,092	
51	Tier 2 (T2) capital before regulatory adjustments	925,658,684	928,856,942	
Tier 2 (T2) capital: regulatory adjustments				
58	Tier 2 (T2) capital	925,658,684	928,856,942	
59	Total capital (TC = T1 + T2)	6,529,842,693	6,036,300,601	
60	Total Risk exposure amount	31,099,503,157	25,914,683,079	
Capital ratios and requirements including buffers				
61	Common Equity Tier 1 capital	18.02%	19.71%	
62	Tier 1 capital	18.02%	19.71%	
63	Total capital	21.00%	23.29%	
64	Institution CET1 overall capital requirements	9.52%	8.90%	
65	of which: capital conservation buffer requirement	2.50%	2.50%	
66	of which: countercyclical capital buffer requirement	0.0026%	0.0032%	
67	of which: systemic risk buffer requirement	0.00%	0.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement*	1.00%	0.00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0.00%	0.00%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	13.52%	14.82%	

*Art.277- If a credit institution at individual or sub-consolidated level makes the object of O-SII buffer and systemic risk buffer, according to the Art.288, the buffer with the highest value is used. Please see Chapter 5.4 for further details

** Please see details in Chapter 3.2. Prudent Valuation

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The reconciliation of the elements from Own Funds with the Financial Statements is presented below:

In RON	Group	Bank	Reference
	31.12.2021	31.12.2021	
Assets:			
Cash and cash equivalents	11,269,110,349	11,269,028,895	
Financial assets at fair value through profit or loss	259,354,172	259,354,172	
Financial derivatives assets held as hedging instruments	12,248,071	12,248,071	
Loans and advances to banks at amortized cost	493,611,663	493,611,659	
Loans and advances to customers at amortized cost	29,395,413,441	27,427,574,818	
Net Lease receivables	3,722,302,407	-	
Debt securities at amortized cost	7,950,629,413	7,950,629,413	
Other financial assets at amortized cost	209,482,256	192,121,636	
Financial assets at fair value through other comprehensive income	1,677,415,405	1,675,069,444	
Investment in subsidiaries	-	143,115,683	
Property, plant and equipment	194,583,892	186,624,775	
Right of use assets	168,672,836	162,870,093	
Intangible assets	300,754,555	284,599,768	
of which: Subject of Regulation 2020/2176 and Intangible assets in progress	228,687,941	221,208,661	a
Current tax assets	568,092	-	
Deferred tax assets	142,887,721	59,682,812	
of which: Deferred tax regarding Intangible Assets	6,522,010	6,522,010	b
Other assets	115,834,321	58,969,804	
Total assets	55,912,868,594	50,175,501,043	
Liabilities:			
Financial liabilities at fair value through profit or loss	32,130,049	32,130,049	
Derivatives liabilities designated as hedging instruments	66,812,087	66,812,087	
Financial liabilities at amortized cost:	-	-	
Deposits from banks	666,989,642	666,989,642	
Loans from banks and other financial institutions at amortized cost	4,170,872,889	570,920,884	
Deposits from customers	39,815,529,179	40,069,143,439	
Debt securities issued	2,491,879,487	1,014,391,560	
Subordinated liabilities	944,182,975	835,324,775	
Other financial liabilities at amortized cost	500,896,039	434,965,512	
Lease liabilities	168,790,054	164,893,970	
Current tax liabilities	41,467,251	35,134,541	
Deferred tax liabilities	756	-	
Provisions	220,122,695	216,200,652	
Other non-financial liabilities	248,445,305	171,772,171	
Total liabilities	49,368,118,408	44,278,679,282	
Shareholders' equity:			
Share capital	1,177,748,252	1,177,748,252	c
Share premium	621,680,499	621,680,499	d
Fair value changes of equity instruments measured at fair value through other comprehensive income	2,247,172	2,247,172	k
Cash flow hedge reserve	-33,406,640	-33,406,640	e
Reserve on financial assets at fair value through other comprehensive income	-12,635,981	-12,635,981	f
Revaluation reserve on property and equipment	14,122,437	14,122,437	g
Other reserves	365,616,183	365,616,183	h
Retained earnings	4,262,400,777	3,761,449,839	i
of which: Profit	779,529,587	639,306,414	
of which: Dividends	583,928,747	583,928,747	j
Total equity for parent company	6,397,772,699	5,896,821,761	
Non-controlling interest	146,977,487	-	
Total Equity	6,544,750,186	5,896,821,761	
Total liabilities and equity	55,912,868,594	50,175,501,043	

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4.2 Summary of Key Prudential Metrics

KM1: Key metrics

RON		31-Dec-2021	30-Sep-2021	30-Jun-2021	31-Mar-21	31-Dec-20
	Available capital (amounts)					
1	Common Equity Tier 1 (CET1) capital	5,604,184,008	5,485,745,987	5,549,305,450	5,455,681,821	5,611,256,834
2	Tier 1 capital	5,604,184,008	5,485,745,987	5,549,305,450	5,455,681,821	5,611,256,834
3	Total capital	6,529,842,693	6,408,568,582	6,463,674,777	6,366,443,245	6,510,250,428
	Risk-weighted exposure amounts					
4	Total risk exposure amount	31,099,503,157	29,846,459,292	28,718,977,247	28,194,699,911	27,156,043,988
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	18.02%	18.38%	19.32%	19.32%	19.35%
6	Tier 1 ratio (%)	18.02%	18.38%	19.32%	19.32%	19.35%
7	Total capital ratio (%)	21.00%	21.47%	22.51%	22.51%	22.58%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 7b	of which: to be made up of CET1 capital (percentage points)	6.02%	6.02%	6.02%	6.02%	6.02%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	8.03%	8.03%	8.03%	8.03%	8.03%
EU 7d	Total SREP own funds requirements (%)	10.71%	10.71%	10.71%	10.71%	10.71%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	0.00260%	0.00180%	0.00114%	0.00003%	0.00005%
EU 9a	Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0	0	0	0	0
EU 10a	Other Systemically Important Institution buffer (%)	1.00%	1.00%	1.00%	1.00%	1.00%
11	Combined buffer requirement (%)	3.50%	3.50%	3.50%	3.50%	3.50%
EU 11a	Overall capital requirements (%)	14.21%	14.21%	14.21%	14.21%	14.21%
12	CET1 available after meeting the total SREP own funds requirements (%)	13.52%	13.88%	14.82%	14.85%	16.16%
	Leverage ratio					
13	Total exposure measure	62,159,867,169	59,691,273,488	55,971,849,138	56,552,426,056	56,860,508,640
14	Leverage ratio (%)	9.02%	9.19%	9.91%	9.65%	9.87%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c	Total SREP leverage ratio requirements (%)	0.00%	0.00%	0.00%	0.00%	0.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					

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RON		31-Dec-2021	30-Sep-2021	30-Jun-2021	31-Mar-21	31-Dec-20
EU 14d	Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	0.00%	0.00%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	17,273,019,538	17,202,930,273	17,149,319,865	17,150,604,397	16,627,762,005
EU 16 a	Cash outflows - Total weighted value	14,919,744,619	14,699,106,329	14,440,729,641	14,213,596,125	13,730,355,104
EU 16 b	Cash inflows - Total weighted value	4,344,836,583	4,362,580,389	4,411,429,304	4,479,434,720	4,309,992,687
16	Total net cash outflows (adjusted value)	10,574,908,036	10,336,525,940	10,029,300,337	9,734,161,406	9,420,362,417
17	Liquidity coverage ratio (%)	163.34%	166.43%	170.99%	176.19%	176.51%
Net Stable Funding Ratio						
18	Total available stable funding	39,571,899,021	37,655,218,179	36,664,152,339	36,370,162,982	37,248,331,575
19	Total required stable funding	24,829,395,127	23,600,574,613	22,076,223,520	21,988,845,371	21,202,491,856
20	NSFR ratio (%)	159.38%	159.55%	166.08%	165.40%	175.68%

5. CAPITAL REQUIREMENTS

5.1 General comment

Capital Adequacy Assessment

During 2021, within the Bank it was continued the sustained process for completing the internal methodological framework with specific regulations, mainly as regards to ICAAP general framework, stress tests, setting and monitoring of risk appetite, capital management rules, rules regarding the new risks identified by the Bank as significant.

The Internal Capital Adequacy Assessment Process was performed in accordance with National Bank of Romania Regulation no 5/2013, with subsequent amendments and changes, representing an independent assessment of the current and future internal capital, related to the risks the bank is facing and in line with the Bank's strategy. UCB assesses the balance between the assumed risk and the available capital consistently with the strategy and assumed objectives, respectively the internal capital and the available financial resources.

The internal capital is represented by the sum of the economic capitals calculated for each risk: credit risk, market risk, operational risk, business risk, real estate investments risk based on internal models (ex. CVaR, VaR etc.).

The ultimate mission of the capital adequacy is to ensure that it forms an integral part of day-to-day management and decision-making processes such as: embedding risk management measures and the capital needed in strategic planning, introduction of risk analysis in strategic planning and budgetary processes.

Thus, the Bank develops and manages its risk management processes, respectively implements processes and tools to assess the level of internal capital adequate to support each type of risk, including those risks not captured by the total capital requirement (i.e. Pillar I risks), within the scope of an assessment of the Bank's legal current and future exposure, taking account its strategies and developments in its business environment.

Necessary regulated own funds requirements at consolidated level

For calculating the regulatory capital requirements for credit risk, the Bank applies the Foundation Internal Rating Based Approach, according to Regulation no. 575/2013 of European Parliament and Council dated 26.06.2013 regarding prudential requirements for credit institutions and investment companies and amending Regulation (UE) no. 648/2012 of the Commission for establishing technical standards for reporting for supervisory purposes and by Regulation no. 5/2013 regarding prudential requirements for credit institutions issued by National Bank of Romania (due to the joint approval received from Bank of Italy, FMA and National Bank of Romania) for the following segments of clients: corporate (except for real estate clients and specialized financing), multinational companies, banks, sovereigns and central banks and securities industries. For the rest of the portfolio, the Bank continued to use the standardized approach.

For calculating the regulatory capital requirements for market risk, the Bank uses the Standardized Approach, while, for operational risk, it is used advanced approach in accordance the above mentioned regulations. All tasks related to the calculation and monitoring of capital requirements are performed by specialized units of Finance Division and Risk Division of the Bank.

For complying with capital adequacy requirements established by Emergency Ordinance 99/2006, the Bank is actively involved in an evaluation process of capital requirements, for sustaining current and future activity, which implies the following processes: budgeting, monitoring and analysis, stress testing and forecasting.

During 2021, PD models on all segments were recalibrated with new DOD (using historical data restated with new default rules) and implemented within dedicated rating systems.

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EU OV1 – Overview of RWAs

		Group			Bank		
		RWA		Capital Requirements	RWA		Capital Requirements
		31.12.2021	30.09.2021	31.12.2021	31.12.2021	30.09.2021	31.12.2021
1	Credit risk (excluding CCR)	27,984,162,969	26,733,051,884	2,238,733,038	23,533,478,304	22,131,792,971	1,882,678,264
2	Of which the standardised approach	12,790,333,645	11,994,141,628	1,023,226,692	7,806,606,005	6,800,063,658	624,528,480
3	Of which the Foundation IRB (F-IRB) approach	15,193,829,324	14,738,910,256	1,215,506,346	15,726,872,300	15,331,729,313	1,258,149,784
4	Of which slotting approach	-	-	-	-	-	-
EU 4a	Of which equities under the simple risk weighted approach	195,518,352	199,501,735	15,641,468	725,046,380	729,029,763	58,003,710
5	Of which the Advanced IRB (A-IRB) approach	-	-	-	-	-	-
6	Counterparty credit risk - CCR	161,246,976	194,182,717	12,899,758	161,246,976	194,182,717	12,899,758
7	Of which the standardised approach	-	-	-	-	-	-
8	Of which internal model method (IMM)	-	315,290	-	-	315,290	-
EU 8a	Of which exposures to a CCP	-	-	-	-	-	-
EU 8b	Of which credit valuation adjustment - CVA	2,348,824	4,366,968	187,906	2,348,824	4,366,968	187,906
9	Of which other CCR	-	-	-	-	-	-
15	Settlement risk	-	-	-	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-	-	-	-
17	Of which SEC-IRBA approach	-	-	-	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-	-	-	-
19	Of which SEC-SA approach	-	-	-	-	-	-
EU 19a	Of which 1250% / deduction	-	-	-	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	85,725,956	206,010,616	6,858,076	85,725,956	206,010,616	6,858,076
21	Of which the standardised approach	85,725,956	206,010,616	6,858,076	85,725,956	206,010,616	6,858,076
22	Of which IMA	-	-	-	-	-	-
EU 22a	Large exposures	-	-	-	-	-	-
23	Operational risk	2,868,367,257	2,713,214,076	229,469,381	2,134,231,843	1,961,013,254	170,738,547
EU 23a	Of which basic indicator approach	734,135,414	752,200,822	58,730,833	-	-	-
EU 23b	Of which standardised approach	-	-	-	-	-	-
EU 23c	Of which advanced measurement approach	2,134,231,843	1,961,013,254	170,738,547	2,134,231,843	1,961,013,254	170,738,547
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-	-	-	-
29	Total	31,099,503,157	29,846,459,293	2,487,960,253	25,914,683,079	24,492,999,558	2,073,174,646

5.2 Capital Planning

Tier 1 capital is the core measure of the Group's financial health and is assessed from the view of its capacity to absorb losses without ceasing business operations. Under Basel III, the minimum Tier 1 capital ratio is 6%, which is calculated by dividing the Bank's tier 1 capital by its total risk-weighted assets.

As at December 2021, the Bank did not hold additional Tier 1 instruments, therefore Core Tier 1 ratio was calculated at the level of Tier 1 ratio, with a consolidated level of 18.02%, significantly higher than the minimum regulatory requirement.

As per Regulation 575/2013, the Minimum Total Capital Requirement is set to 8% of Risk Weighted Assets.

Based on common decision European Central Bank and National Bank of Romania (SREP process), UniCredit Bank must at all times satisfy the total capital ratio (solvency ratio) of 11.38% at individual level and 10.71% at consolidated level.

The total minimum capital requirements (including Pillar I and Pillar II buffers) is 13.88% at individual level and 14.21% at sub-consolidated level.

5.3 Risk Management and business model - RWA segmentation

One of the Group's strategic objectives was the development of a sound risk culture extended both at management level and at the level of all business units with risk management responsibilities, by determining company-wide views on acceptable relationships between the risks and profitability at a Group's overall level and for each significant activity in order to ensure sustainability of sound and prudent operations.

UniCredit Bank targeted a balanced asset portfolio in order to diminish the exposures that have a high risk associated. Also, the Bank performs various processes for RWA optimization, on a regular basis.

5.4 Capital surcharges & buffers

Regulation no. 5/2013 issued by National Bank of Romania includes specific provisions for capital buffers that may be applicable on top of minimum capital requirements. The following buffers were imposed by the National Bank of Romania through Order no. 12/2015, Order no. 8/2018 and Order no. 5/2020:

Capital requirements - Pillar I	Group	Bank
Capital conservation buffer	2.50%	2.50%
Countercyclical capital buffer	0.0026%	0.0011%
O-SII buffer	1%	-
Systemic risk buffer	1%, but supplementary requirement set at 0%, according to art. 276 and 277 from NBR Reg. no 5/2013	-
Combined buffer requirement	3.50%	2.50%

Additionally, College of Supervisors of European Central Bank (ECB), in line with the local Supervisory Review and Evaluation Process (SREP) assessment carried out by the National Bank of Romania, decided that UniCredit Bank S.A. shall maintain a total solvency ratio above 11.38% at individual level and 10.71% at sub-consolidated level.

Solvency ratio - minimum requirements including Pillar I & II buffers	31.12.2021		
	NBR Supervisory Report – SREP	Capital buffers	TOTAL
<i>- individual level</i>			
CET 1 ratio	6.40%	2.50%	8.90%
Tier 1 ratio	8.54%		11.04%
Total capital ratio	11.38%		13.88%
<i>-sub-consolidated level</i>			

Solvency ratio - minimum requirements including Pillar I & II buffers	31.12.2021		
	NBR Supervisory Report – SREP	Capital buffers	TOTAL
CET 1 ratio	6.02%	3.50%	9.52%
Tier 1 ratio	8.03%		11.53%
Total capital ratio	10.71%		14.21%

Other Systemically Important Institutions buffer

As per National Bank of Romania Order no. 5/2020, UniCredit Bank was identified as O-SII (Other Systemically Important Institutions) by the NBR (National Bank of Romania) and consequently, an O-SII buffer of 1% of the total risk weighted exposure, calculated as per art. 92(3) of EU Regulation no. 575/2013 on prudential requirements for credit institutions, had to be maintained by the bank at sub-consolidated level, during 2021.

Capital conservation buffer

As per National Bank of Romania Regulation no. 5/2013 on prudential requirements for credit institutions, following the fully loaded approach, UniCredit Bank had to maintain during 2021 a capital conservation buffer of 2.5% of the total risk weighted exposure, calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013, at both individual and sub-consolidated level.

Systemic risk buffer

As per National Bank of Romania Order no. 8/2018 regarding systemic risk capital buffer and the notification of additional constant capital requirements in systemic risk amortization applicable from 1 January 2021, UniCredit Bank maintained, at sub-consolidated level, a systemic risk buffer of 1% of the total risk weighted exposure, calculated as per art. 92(3) of Regulation no. 575/2013 on prudential requirements for credit and investment institutions, and amending Regulation (EU) no. 648/2012.

This buffer was applicable starting 01.01.2021, with semi-annual review.

As per article 277 of NBR Regulation no 5/2013, “where a credit institution, at individual or sub-consolidated level, is subject to an O-SII buffer and a systemic risk buffer, the higher of the two shall apply”, thus the capital requirement for structural buffers is determined as the maximum level between buffer value (O-SII) and the systemic risk buffer.

Therefore, in the case of UCB, the maximum combined requirement for the systemic risk buffer and O-SII buffer, was 1% in 01.01.2021.

Countercyclical capital buffer

As per National Bank of Romania Order no.12/2015, during 2021, UniCredit Bank applied a countercyclical capital buffer between 0% and 0.0026% of the total risk weighted exposure on Romanian entities, calculated as per art. 92(3) of EU Regulation no. 575/2013 on prudential requirements for credit institutions.

As of 31.12.2021, UniCredit Bank maintained an overall countercyclical buffer rate, expressed as a percentage of the total risk exposure amount under Article 92 paragraph (3) of Regulation (EU) No 575/2013, of 0.0032% at individual level and of 0.0026% sub-consolidated level, driven by the exposures on non – Romanian entities.

Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

Breakdown by country	General credit exposures		Trading book exposure		Own funds requirements				Own funds requirement weights recomputed with all decimals	Countercyclical capital buffer rate
	Exposure value for SA	Exposure value IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
	10	20	30	40	70	80	90	100	110	120
Australia	361,446	-	-	-	10,139	-	-	10,139	0.00000	0.00000
Austria	119,791	4,753,938	-	-	150,875	-	-	150,875	0.00007	0.00000
Belgium	102,898	-	-	-	2,882	-	-	2,882	0.00000	0.00000
British Indian Ocean Territories	6,763	-	-	-	541	-	-	541	0.00000	0.00000
Bulgaria	1,533,473	-	-	-	83,158	-	-	83,158	0.00004	0.50000
Canada	279,402	-	-	-	10,351	-	-	10,351	0.00001	0.00000
Cyprus	159	-	-	-	13	-	-	13	0.00000	0.00000
Denmark	15,013	-	-	-	1,200	-	-	1,200	0.00000	0.00000
France	11,576,567	6,612	-	-	926,352	-	-	926,352	0.00045	0.00000
Georgia	-	2,185,350	-	-	207,008	-	-	207,008	0.00010	0.00000
Germany	115,394,718	-	-	-	7,211,411	-	-	7,211,411	0.00352	0.00000
Greece	178	-	-	-	14	-	-	14	0.00000	0.00000
Hungary	14	-	-	-	1	-	-	1	0.00000	0.00000
Indonesia	22,832	-	-	-	1,370	-	-	1,370	0.00000	0.00000
Ireland	7,371	-	-	-	234	-	-	234	0.00000	0.00000
Israel	297,515	-	-	-	8,363	-	-	8,363	0.00000	0.00000
Italy	35,820,837	21,458,407	-	-	3,835,760	-	-	3,835,760	0.00187	0.00000
Lebanon	37,160	-	-	-	2,973	-	-	2,973	0.00000	0.00000
Moldova, Republic	136	-	-	-	11	-	-	11	0.00000	0.00000
Morocco	-	82,056	-	-	3,416	-	-	3,416	0.00000	0.00000
Netherlands	123,677,582	-	-	-	9,894,157	-	-	9,894,157	0.00483	0.00000
Nigeria	116	-	-	-	7	-	-	7	0.00000	0.00000
Poland	268,766	-	-	-	-	-	-	-	-	0.00000
Romania	18,065,017,090	16,659,949,085	-	-	2,011,348,772	-	-	2,011,348,772	0.98098	0.00000
Russian Federation	-	1,376,593	-	-	76,007	-	-	76,007	0.00004	0.00000
Slovakia	245,739	-	-	-	11,432	-	-	11,432	0.00001	1.00000
Slovenia	-	33,214,263	-	-	926,665	-	-	926,665	0.00045	0.00000
Spain	59,151	-	-	-	3,563	-	-	3,563	0.00000	0.00000
Sweden	13	-	-	-	1	-	-	1	0.00000	0.00000
Switzerland	90	181,397	-	-	3,513	-	-	3,513	0.00000	0.00000
Tunisia	-	162,592	-	-	24,132	-	-	24,132	0.00001	0.00000
Turkey	24,645	-	-	-	1,485	-	-	1,485	0.00000	0.00000
United Kingdom	5,468,969	9,943,678	-	-	657,109	-	-	657,109	0.00032	0.00000
United States	413,863	46,759,634	-	-	13,854,188	-	-	13,854,188	0.00676	0.00000
Vietnam	-	5,117	-	-	598	-	-	598	0.00000	0.00000
Other Countries	21,479	925,410	-	-	1,088,256	-	-	1,088,256	0.000265	0.00000

*Securitization exposures are 0 and are not presented in the template

Countercyclical buffer capital requirements- Synthesis (CCYB2)

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COUNTERCYCLICAL BUFFER CAPITAL REQUIREMENTS	31.12.2021	31.12.2020
Total risk exposure amount	31,099,503	27,156,044
Institution specific countercyclical capital buffer rate	0.0026%	0.005%
Institution specific countercyclical capital buffer requirement	8.04068	13

In order to calculate the weighted average, the Bank applied to each amortization rate applicable in a jurisdiction the coefficient in accordance with Part Three, Titles II and IV of Regulation (EU) No. 575/2013, corresponding to the relevant exposures (i.e. exposures other than institutions, central banks and central administrations) from loans located in the respective jurisdiction, to the total own funds requirements for credit risk related to all its exposures from relevant loans.

5.5 RWA calculation method and models

The Bank calculates RWA according to the provisions of EU Regulation no. 575/2013 of the European Parliament and of the Council, using the following approaches:

Standardized Approach:

Risk-weighted exposure amount is calculated by using Fixed Regulatory Risk Weights (RW) and depends on the obligor type (Corporate/ Retail) and external rating (if available).

Internal Rating Base (IRB) Approach:

Risk-weighted exposure is calculated by using Calculated Risk Weights (RW) based on internally built credit risk parameters: Probability of default (PD), Loss given default (LGD), Exposure at default (EAD), M (Maturity).

In **Internal Rating Base** approach, Capital Reserve is adequate to the specific risk profile of the portfolio.

5.6 RWA changes over time

In July 2012, the Bank has obtained the joint approval of Bank of Italy, Financial Market Authority and National Bank of Romania to use the Foundation – Internal Rating Based approach for the calculation of minimum capital requirements for the following client segments: corporate clients (except for real estate clients and specialized financing), multinational companies, banks, central banks and sovereigns and financial investment companies.

According to Joint Decision ECB / NBR received during Q2 2020, the Bank received the permission to implement material changes to the Romanian probability of default model for the Mid-Corporate portfolio of UniCredit Bank SA and to apply the permanent partial use of the standardized approach to the non-banking financial institutions portfolio, real estate companies and foreign clients' portfolios. This Decision was adopted pursuant to Articles 20(1)(a), 143(3), 149(1)(a), 150(1)(b) and (c) of Regulation (EU) No 575/2013 of the European Parliament and of the Council, Article 13 of Commission Implementing Regulation (EU) 2016/1004 in conjunction with Article 4(1)(e), Article 9(1) and Article 10(1) of Regulation (EU) No 1024/2013. The approach has been implemented and the impact is to be seen gradually within a period of several months corroborated with the re-rating process on all clients within the perimeter.

According to NBR approval received on 22 December 2020 regarding the provisions of the Article 150 of Regulation No 575/2013 of the European Parliament, the Bank started to temporary report the exposures in foreign currency of EU member states of Central Administrations and Central Banks according to standardized approach using a 0% RWA percentage.

Further, for the rest of the loan portfolio, the Bank continued to apply the Standardized approach.

During 2021, PD models on all segments were recalibrated with new DOD (using historical data restated with new default rules) and implemented within dedicated rating systems.

6. CREDIT RISK

6.1 Strategies, policies and processes for credit risk management

Credit risk strategy is established by all the Bank's activities that present a significant exposure to credit risk. The Bank's credit risk strategy is reviewed periodically, but at least once a year and whenever significant changes occur in risk assessment factors, and is approved by the Bank's management structure. The credit risk strategy reflects the tolerance to risk and the profitability level which the Bank intends to achieve in the conditions of the exposure to the assumed risks.

The Bank assesses the credit risk in all activities affected by this kind of risk, no matter if the results of the respective activities are reflected in the balance sheet or off balance sheet.

The Bank has established risk management processes and has tools in order to identify, measure, monitor and control the credit risk.

The Bank's credit risk management policy promotes a set of coherent principles and practices, oriented towards the following main directions:

- Establishment of a framework and adequate parameters of credit risk;
- Promotion and operation of a healthy and solid credit granting process;
- Promotion and maintenance of an adequate process for credit administration, measurement and monitoring;
- Permanent control over the quality of the loan portfolio.

The credit risk management is performed taking into consideration the loans both at individual level and at whole portfolio level and includes the consideration of the qualitative and quantitative aspects related to risks.

Credit risk management is realized by limiting credit risk exposures setting limits established in accordance with general strategy of the Bank (limits established by sectors of activity, zones geographical areas, counterparty categories, type of products, residence, country and currency, etc.). These limits are monitored and periodically reported to relevant committees.

The Bank is exposed in particular to credit risk in credit granting activity, this being the most common type of risk the Bank is confronted with.

The most important activity generating risk is financing, but any other banking activity can potentially generate credit risk (off balance commitments and debts, deposits constitution and other transaction on inter-banking market, hedging on stock/interbank market, etc.)

The Bank has a credit risk management process that takes into account its risk appetite, risk profile and market and macroeconomic conditions. This process includes policies and processes to identify, measure, evaluate, monitor, report, control and mitigate credit risk - including counterparty credit risk and potential future exposure, policies and processes aiming to capture the material risks inherent in individual products or transactions.

Credit risk includes risk derived from credit granting activity and from other transactions initiated for Bank clients, such as: issuance of LGs, opening / confirmation of LC's, availing, discounting of trade instruments presented by the clients, investments in stocks and other financial assets, other facilities granted to clients.

The scope and type of reporting and measuring systems for credit risk

In order to evaluate the basis of prudential exposure to credit risk, the Bank implemented rating systems (through consideration of quantitative factors, qualitative factors and payment behavior related factors), for all categories of clients in order to realize the classification of exposures based on the assessment borrowers' credit risk throughout the entire loan life cycle, by reference to a general scale assessment of default risk.

In UniCredit Bank internal ratings and default probability plays an essential role in the entire process of credit risk management. Rating assessment is an important part of the credit approval process. Credit risk tolerance is considering limits for granting credit exposures on rating classes. During the credit life cycle, the rating information is an important part of monitoring as well as of restructuring and of the progress of non-performing loans.

In addition, the risk reporting and portfolio management focuses on rating (in addition to information on debt service).

6.2 The structure and organization of the credit risk management and control function

Credit risk management processes within UniCredit Bank imply the following:

- Accurate definition of specific processes and procedures for credit risk management differentiated depending on the main components of credit risk and the stage of the credit granting process, as follows:
 - Procedures of risk management at credit granting stage;
 - Procedures to prevent and mitigate default risk, settlement risk, concentration risk and residual risk;
 - Procedures for the prevention and mitigation of the risk related to foreign currency lending for debtors exposed to currency risk;
 - Specific procedures for identification and management of forborne loans and non-performing loans.
- Adequacy of credit risk procedures, policies and management tools, in line with the strategy:
 - Identification of the risk associated to the customer by applying internal rating specific for each client category; the analysis of the customer's rating, which is achieved by an internal assessment system;
 - Requesting complete and adequate proving documents from customers according to the type of financing and to the associated risk;
 - Approval of the standard parameters of lending products by taking into account the analysis of the associated risks;
 - Continuous monitoring of the loan portfolio;
- Exposure collateralization with eligible collaterals according to the legal stipulations in force, and also based on the Basel III implementation approach and relevant internal norms and procedures;
- Other credit risk mitigation techniques.

The credit risk management process is considering the appropriate allocation of duties that are clearly defined in specific lending procedures so as not to be assigned responsibilities that lead to conflicts of interest.

The credit facilities are approved in accordance with the internal lending rules and procedures, set up in accordance with the provisions of the National Bank of Romania regulations, specific for each category of customers.

The Bank has implemented policies and processes for monitoring the total indebtedness of the customers, as well as any risk factor that may lead to a default, including uncovered foreign exchange risk.

6.3 Credit risk impairment/NLPs (non-performing loans) policies

A financial asset or a group of financial assets is impaired and impairment losses are incurred if, and only if, there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a 'loss event') and that loss event (or events) has an impact on the estimated future CF of the financial asset or group of financial assets that can be reliably estimated. It may not be possible to identify a single, discrete event that caused the impairment. Rather the combined effect of several events may have caused the impairment.

At the end of each reporting period the Bank evaluates whether there is any objective evidence that a financial asset or group of financial assets is impaired.

Non-performing exposures means the cases in which, due to deterioration of the economic and financial situation of the borrower, they are neither capable, nor worthy of being restructured. Included in this category are also those companies whose business is about to end (e.g.: voluntary liquidation or similar situations).

Non-performing exposures (NPE) are considered the exposures which satisfy either or both of the following criteria:

- (a) material exposures which are *more than 90 days past-due*;
- (b) the debtor is assessed as *unlikely to pay its credit obligations* in full without realisation of collateral, regardless of the existence of any past-due amount or of the number of days past due;
- (c) unpaid amount/instalments

Starting with 2021, the Bank implemented the new definition of default, in accordance with the requirements of EBA Guide GL / 2016/07 on the application of the definition of default and in conjunction with the requirements of the NBR Regulation no. 5/2013 on prudential requirements for credit institutions, with subsequent amendments and completions.

The significance threshold of the obligations from past due loans was aligned, at the level set up by Regulation no. 5/2018 amending and supplementing the Regulation of the National Bank of Romania no. 5/2013 regarding prudential requirements for credit institutions, as follows:

The materiality threshold for credit obligations past due, for retail exposures:

- a) the level of the relative component of the materiality threshold is 1 %;
- b) the level of the absolute component of the materiality threshold is 150 lei;

The materiality threshold for credit obligations past due, for exposures other than retail exposures:

- a) the level of the relative component of the materiality threshold is 1 %;
- b) the level of the absolute component of the materiality threshold is 1 000 lei;

During 2021, PD models on all segments were recalibrated with new DOD (using historical data restated with new default rules) and implemented within dedicated rating systems.

Any replacement operation of an exposure granted to a debtor that is facing or about to face financial difficulties in meeting its financial commitments represents a concession granted to the borrower (**forbearance**), which would not have been granted if the debtor had not been in financial difficulties. Both conditions - the concession of a measure in favour of the debtor and the assessment of its financial difficulty - have to be met for an exposure in order to be considered as forborne.

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EU CR5 – Standardised approach

The template presents the split of the balance sheet and of the off balance sheet elements by asset class and by risk weighted assets according to the standardised approach; exposures are presented after CCF and CRM.

The columns “Without Rating” concerns the exposures for which a credit assessment performed by an ECAI Institution is not available and risk weights are applied according to the articles 113-134 CRR.

	Exposure classes	Risk Weight								
		0%	2%	4%	10%	20%	35%	50%	70%	75%
1	Central governments or central banks	14,634,518,641	-	-	-	-	-	68,559	-	-
2	Regional government or local authorities	-	-	-	-	489,728,045	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	348,984,801	-	-	-	-	-	-	-	-
5	International organizations	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	47,270,167	-	37,893,406	-	-
7	Corporates	-	-	-	-	-	-	45,532,113	-	-
8	Retail	-	-	-	-	-	-	-	-	5,917,065,513
9	Secured by mortgages on immovable property	-	-	-	-	-	6,240,676,272	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-
12	Covered bonds	-	-	-	-	-	-	-	-	-
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	81,454	-	-	-	-
14	Collective investment undertakings	-	-	-	-	-	-	-	-	-
15	Equity	-	-	-	-	-	-	-	-	-
16	Other items	7,366	-	-	-	-	-	-	-	-
17	Total	14,983,510,808	-	-	-	537,079,666	6,240,676,272	83,494,078	-	5,917,065,513

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UE CR5 – Standardised approach (continued)

	Exposure classes	Risk Weight							Total	Of which unrated
		100%	150%	250%	370%	1250%	Others	Deducted		
1	Central governments or central banks	-	-	83,204,908	-	-	-	-	14,717,792,108	-
2	Regional government or local authorities	165,102,565	-	-	-	-	-	-	654,830,610	-
3	Public sector entities	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	348,984,801	-
5	International organizations	-	-	-	-	-	-	-	-	-
6	Institutions	631,867,265	-	-	-	-	-	-	717,030,838	-
7	Corporates	5,178,145,045	62,311,766	-	-	-	-	-	5,285,988,924	-
8	Retail	-	-	-	-	-	-	-	5,917,065,513	-
9	Secured by mortgages on immovable property	377,998,912	-	-	-	-	-	-	6,618,675,184	-
10	Exposures in default	403,152,218	14,666,215	-	-	-	-	-	417,818,433	-
11	Exposures associated with particularly high risk	-	18,060,296	-	-	-	-	-	18,060,296	-
12	Covered bonds	-	-	-	-	-	-	-	-	-
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	81,454	-
14	Collective investment undertakings	-	-	-	-	-	-	-	-	-
15	Equity	2,345,997	-	-	-	-	-	-	2,345,997	-
16	Other items	100,730,615	-	-	-	-	-	-	100,737,981	-
17	Total	6,859,342,617	95,038,277	83,204,908	-	-	-	-	34,799,412,139	-

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The templates below have been prepared in compliance with EBA Technical Standards and aligned with the information presented in the Group's FINREP prepared at consolidated level for December 31, 2021.

According to the UniCredit group approach, the non-performing exposures are equal to defaulted and to the impaired exposures.

The value of collaterals presented in the following tables from this chapter represents the market value capped at individual loan exposure level and furthermore adjusted (haircuts applied) as per internal procedure regarding loan impairment computation.

The loans and advances exposures from this chapter do not include the following types of exposures, considered in the other tables from Chapter 6: CCR for derivatives, participations, other assets & deferred tax of subsidiaries, other assets of the Bank in relationship with the Romanian state, however include other financial assets of the Bank.

EU CQ1 - Credit quality of forborne exposures

		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
Of which defaulted	Of which impaired								
1	Loans and advances	1,118,930,618	1,001,616,308	1,001,616,308	1,001,616,308	-49,665,220	-755,950,170	1,236,942,314	224,559,755
2	Central banks	-	-	-	-	-	-	-	-
3	General governments	75,488	-	-	-	-641	-	74,847	-
4	Credit institutions	-	-	-	-	-	-	-	-
5	Other financial corporations	87,662	93,888	93,888	93,888	-863	-93,888	62,067	-
6	Non-financial corporations	1,067,339,178	857,308,718	857,308,718	857,308,718	-45,331,756	-670,801,976	1,159,254,528	178,067,101
7	Households	51,428,290	144,213,702	144,213,702	144,213,702	-4,331,960	-85,054,306	77,550,872	46,492,654
8	Debt Securities	-	-	-	-	-	-	-	-
9	Loan commitments given	216,690,436	65,908,705	-	-	-788,516	-39,189,601	232,199,885	23,596,320
10	Total	1,335,621,054	1,067,525,013	1,001,616,308	1,001,616,308	-48,876,704	-716,760,569	1,469,142,199	248,156,075

EU CQ2: Quality of forbearance

		Gross carrying amount of forborne exposures
1	Loans and advances that have been forborne more than twice	577,555,668
2	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	106,906,237

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EU CQ3: Credit quality of performing and non-performing exposures by past due days

		Gross carrying amount/nominal amount					
		Performing exposures			Non-performing exposures		
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days
0	Cash balances at central banks and other demand deposits	3,402,605,619	3,402,605,619	-	-	-	-
1	Loans and advances	39,817,873,418	39,762,669,643	55,203,775	2,071,171,514	1,759,392,262	112,358,107
2	Central banks	-	-	-	-	-	-
3	General governments	392,669,801	392,669,801	-	157,836,616	157,836,616	-
4	Credit institutions	6,448,537,705	6,448,537,705	-	-	-	-
5	Other financial corporations	814,200,466	814,200,466	-	217,560	90,207	-
6	Non-financial corporations	23,152,970,632	23,135,760,721	17,209,911	1,520,508,574	1,380,031,834	21,753,105
7	Of which SMEs	14,344,827,080	14,327,617,169	17,209,911	1,122,824,284	985,193,807	21,753,105
8	Households	9,009,494,814	8,971,500,950	37,993,864	392,608,764	221,433,605	90,605,002
9	Debt securities	9,645,313,732	9,645,313,732	-	-	-	-
10	Central banks	-	-	-	-	-	-
11	General governments	9,622,392,569	9,622,392,569	-	-	-	-
12	Credit institutions	-	-	-	-	-	-
13	Other financial corporations	22,921,163	22,921,163	-	-	-	-
14	Non-financial corporations	-	-	-	-	-	-
15	Off-balance-sheet exposures	20,176,119,909			219,538,421		
16	Central banks	-			-		
17	General governments	438,134,951			-		
18	Credit institutions	2,252,924,851			-		
19	Other financial corporations	455,205,247			-		
20	Non-financial corporations	16,592,807,779			214,784,360		
21	Households	437,047,081			4,754,061		
22	Total	73,041,912,678	52,810,588,994	55,203,775	2,290,709,935	1,759,392,262	112,358,107

EU CQ3: Credit quality of performing and non-performing exposures by past due days (continued)

		Gross carrying amount/nominal amount					
		Non-performing exposures					
		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
0	Cash balances at central banks and other demand deposits	-	-	-	-	-	-
1	Loans and advances	78,261,414	53,056,952	52,061,197	7,571,355	8,470,227	2,071,171,514
2	Central banks	-	-	-	-	-	-
3	General governments	-	-	-	-	-	157,836,616
4	Credit institutions	-	-	-	-	-	-
5	Other financial corporations	-	-	93,888	17,394	16,071	217,560
6	Non-financial corporations	32,171,804	38,649,658	39,132,901	3,520,496	5,248,776	1,520,508,574
7	Of which SMEs	32,171,804	38,649,658	36,286,638	3,520,496	5,248,776	1,122,824,284
8	Households	46,089,610	46,089,610	12,834,408	4,033,465	3,205,380	392,608,764
9	Debt securities	-	-	-	-	-	-
10	Central banks	-	-	-	-	-	-
11	General governments	-	-	-	-	-	-
12	Credit institutions	-	-	-	-	-	-
13	Other financial corporations	-	-	-	-	-	-
14	Non-financial corporations	-	-	-	-	-	-
15	Off-balance-sheet exposures						219,538,421
16	Central banks						-
17	General governments						-
18	Credit institutions						-
19	Other financial corporations						-
20	Non-financial corporations						214,784,360
21	Households						4,754,061
22	Total	78,261,414	53,056,952	52,061,197	7,571,355	8,470,227	2,290,709,935

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EU CQ4: Quality of non-performing exposures by geography

		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 defaulted	Of which subject to impairment			
1	On-balance-sheet exposures	45,291,650,551	2,071,171,514	2,071,171,514	45,291,650,551	2,174,390,511	-
2	ROMANIA	39,078,957,724	2,070,455,070	2,070,455,070	39,078,957,724	2,172,891,076	-
3	ITALY	5,934,382,814	55,075	55,075	5,934,382,814	669,192	-
4	GERMANY	160,836,409	114,201	114,201	160,836,409	473,788	-
5	USA	42,217,163	12,616	12,616	42,217,163	27,505	-
6	AUSTRIA	16,334,947	-	-	16,334,947	4,211	-
7	HUNGARY	14,131,996	-	-	14,131,996	9,429	-
8	LUXEMBOURG	12,401,982	-	-	12,401,982	861	-
9	FRANCE	11,950,154	2,577	2,577	11,950,154	43,753	-
10	UNITED KINGDOM	7,999,730	-	-	7,999,730	22,919	-
11	POLAND	4,607,446	404,935	404,935	4,607,446	128,448	-
12	BULGARIA	2,437,175	-	-	2,437,175	3,832	-
13	SWITZERLAND	2,207,574	-	-	2,207,574	1,107	-
14	DUBAI	739,393	-	-	739,393	631	-
15	JAPAN	415,319	-	-	415,319	102	-
16	AUSTRALIA	400,103	757	757	400,103	38,658	-
17	CZECH REPUBLIC	392,245	-	-	392,245	162	-
18	CANADA	313,816	79,172	79,172	313,816	34,414	-
19	ISRAEL	307,348	1,095	1,095	307,348	944	-
20	OTHER COUNTRIES	617,213	46,016	46,016	617,213	39,479	-
21	Off-balance-sheet exposures	20,395,658,330	219,538,421	219,538,421		197,833,807	
22	ROMANIA	17,582,438,280	219,374,800	219,374,800		196,863,907	
23	ITALY	822,947,301	-	-		197,995	
24	SPAIN	445,875,241	-	-		35,892	
25	SWITZERLAND	282,223,229	-	-		38,044	
26	GERMANY	277,362,288	-	-		398,251	
27	NETHERLANDS	247,830,682	-	-		55,583	
28	FRANCE	144,588,429	-	-		27,183	
29	AUSTRIA	140,910,757	-	-		16,702	
30	JAPAN	116,393,119	-	-		3,188	
31	SLOVENIA	85,943,513	-	-		35,881	
32	USA	56,149,700	119,914	119,914		4,237	
33	CZECH REPUBLIC	38,821,780	-	-		2,666	
34	TURKEY	38,363,947	-	-		31,131	
35	HUNGARY	32,068,781	-	-		1,340	
36	DENMARK	30,772,339	-	-		1,138	
37	UNITED KINGDOM	20,081,438	-	-		1,089	
38	BULGARIA	8,351,904	-	-		30,427	
39	POLAND	8,109,334	-	-		551	
40	GEORGIA	4,370,700	-	-		488	

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		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				
41	MALTA	2,968,520	-	-		50,708	
42	RUSSIA	2,516,604	-	-		605	
43	CANADA	1,763,759	-	-		60	
44	INDIA	853,829	-	-		343	
45	TUNISIA	812,960	-	-		1,437	
46	MONACO	792,224	-	-		20,163	
47	SLOVAKIA	505,559	-	-		3	
48	PORTUGAL	442,086	-	-		90	
49	MOROCCO	410,280	-	-		37	
50	UNITED ARAB EMIRATES	353,613	-	-		5	
51	MEXICO	267,984	-	-		130	
52	OTHER COUNTRIES	368,150	43,707	43,707		14,533	

EU CQ5: Credit quality of loans and advances by industry

		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				
1	Agriculture, forestry and fishing	1,908,018,733	89,882,656	89,882,656	1,908,018,733	-99,432,688	-
2	Mining and quarrying	222,478,188	484,388	484,388	222,478,188	-2,065,559	-
3	Manufacturing	6,304,546,500	635,609,632	635,609,632	6,304,546,500	-565,910,686	-
4	Electricity, gas, steam and air conditioning supply	806,427,891	28,376,577	28,376,577	806,427,891	-47,754,477	-
5	Water supply	179,147,099	19,753,483	19,753,483	179,147,099	-18,614,287	-
6	Construction	1,619,327,413	122,129,480	122,129,480	1,619,327,413	-97,843,151	-
7	Wholesale and retail trade	7,090,252,445	237,074,218	237,074,218	7,090,252,445	-281,758,079	-
8	Transport and storage	1,748,243,715	79,429,136	79,429,136	1,748,243,715	-111,893,863	-
9	Accommodation and food service activities	280,831,033	77,870,463	77,870,463	280,831,033	-65,458,582	-
10	Information and communication	708,098,636	23,575,235	23,575,235	708,098,636	-26,385,768	-
11	Financial and insurance activities	668,636,791	39,437	39,437	668,636,791	-1,496,864	-
12	Real estate activities	1,960,646,450	99,794,112	99,794,112	1,960,646,450	-178,734,070	-
13	Professional, scientific and technical activities	410,376,471	79,287,365	79,287,365	410,376,471	-60,368,150	-
14	Administrative and support service activities	408,452,872	9,757,850	9,757,850	408,452,872	-15,752,084	-
15	Public administration and defense, compulsory social security	20,243,255	-	-	20,243,255	-105,778	-
16	Education	20,645,184	858,557	858,557	20,645,184	-1,051,792	-
17	Human health services and social work activities	135,885,037	7,970,184	7,970,184	135,885,037	-7,081,146	-
18	Arts, entertainment and recreation	23,062,010	1,550,488	1,550,488	23,062,010	-703,495	-
19	Other services	158,159,483	7,065,313	7,065,313	158,159,483	-36,388,080	-
20	Total	24,673,479,206	1,520,508,574	1,520,508,574	24,673,479,206	-1,618,798,599	-

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EU CQ6 - Collateral valuation - loans and advances

		Loans and advances					
		Performing			Non-performing		
				Of which past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days
1	Gross carrying amount	41,889,044,932	39,817,873,418	55,203,775	2,071,171,514	1,759,392,262	311,779,252
2	Of which secured	25,596,806,671	23,877,006,728	41,395,913	1,719,799,943	1,556,227,739	163,572,204
3	Of which secured with immovable property	18,054,984,136	16,770,185,358	24,255,778	1,284,798,778	1,189,827,343	111,135,405
4	Of which instruments with LTV higher than 60% and lower or equal to 80%	4,453,974,033	4,224,018,531		229,955,502	215,319,370	14,636,132
5	Of which instruments with LTV higher than 80% and lower or equal to 100%	2,202,998,764	2,125,775,916		77,222,848	48,612,868	28,609,980
6	Of which instruments with LTV higher than 100%	6,637,408,873	6,043,957,536		593,451,337	569,984,111	23,467,226
7	Accumulated impairment for secured assets	-1,749,438,789	-500,248,245	-2,834,778	-1,249,190,544	-1,126,952,314	-122,238,230
8	Collateral						
9	Of which value capped at the value of exposure	28,687,226,282	28,235,053,664	25,446,173	452,172,618	412,580,605	39,592,013
10	Of which immovable property	13,613,411,582	13,272,233,185	21,310,006	341,178,397	308,036,729	33,141,668
11	Of which value above the cap	13,201,818,650	11,582,819,754	29,757,602	1,618,998,896	1,346,811,657	272,187,239
12	Of which immovable property	4,441,572,554	3,497,952,173	2,945,772	943,620,381	881,790,614	77,993,737
13	Financial guarantees received	2,522,537,437	2,516,552,052	692,643	5,985,385	5,339,911	645,474
14	Accumulated partial write-off	-	-	-	-	-	-

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EU CQ6 - Collateral valuation - loans and advances (continued)

		Past due > 90 days					
		Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years
1	Gross carrying amount	112,358,107	78,261,414	53,056,952	52,061,197	7,571,355	8,470,227
2	Of which secured	30,592,931	43,191,992	43,105,624	36,807,702	6,109,666	3,764,289
3	Of which secured with immovable property	34,711,004	23,459,543	31,449,540	14,234,290	4,975,236	2,305,792
4	Of which instruments with LTV higher than 60% and lower or equal to 80%						
5	Of which instruments with LTV higher than 80% and lower or equal to 100%						
6	Of which instruments with LTV higher than 100%						
7	Accumulated impairment for secured assets	-18,783,276	-32,152,914	-30,409,500	-31,769,509	-5,791,429	-3,331,602
8	Collateral						
9	Of which value capped at the value of exposure	11,088,768	10,803,141	11,939,151	5,032,742	295,523	432,688
10	Of which immovable property	6,982,265	9,670,125	10,728,604	5,032,463	295,523	432,688
11	Of which value above the cap	101,269,339	67,458,273	41,117,801	47,028,455	7,275,832	8,037,539
12	Of which immovable property	27,728,739	13,789,418	20,720,936	9,201,827	4,679,713	1,873,104
13	Financial guarantees received	96,614	111,243	414,903	-	22,714	-
14	Accumulated partial write-off	-	-	-	-	-	-

* The value of collaterals presented in the following tables from this chapter represents the market value capped at individual loan exposure level and further more adjusted (haircuts applied) as per internal procedure regarding loan impairment computation. The value of collaterals disclosed in the narrative disclosures under the above mentioned tables represents market value of collaterals before any haircuts applied.

EU CQ7: Collateral obtained by taking possession and execution processes

		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
1	Property, plant and equipment (PP&E)	-	-
2	Other than PP&E	67,129,999	-37,087,344
3	Residential immovable property	328,274	-36,054
4	Commercial Immovable property	-	-
5	Movable property (auto, shipping, etc.)	66,801,725	-37,051,290
6	Equity and debt instruments	-	-
7	Other	-	-
8	Total	67,129,999	37,087,344

EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown

		Debt balance reduction		Total collateral obtained by taking possession			
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Foreclosed ≤ 2 years	
						Value at initial recognition	Accumulated negative changes
1	Collateral obtained by taking possession classified as PP&E	-	-	-	-	-	-
2	Collateral obtained by taking possession other than that classified as PP&E	67,293,987	-37,335,677	67,129,999	-37,087,344	32,144,536	-11,604,724
3	Residential immovable property	492,262	-284,387	328,274	-36,054	328,274	-36,054
4	Commercial immovable property	-	-	-	-	-	-
5	Movable property (auto, shipping, etc.)	66,801,725	-37,051,290	66,801,725	-37,051,290	31,816,262	-11,568,670
6	Equity and debt instruments	-	-	-	-	-	-
7	Other	-	-	-	-	-	-
8	Total	67,293,987	-37,335,677	67,129,999	-37,087,344	32,144,536	-11,604,724

EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown (continued)

		Total collateral obtained by taking possession					
		Foreclosed > 2 years ≤ 5 years		Foreclosed > 5 years		Of which non-current assets held-for-sale	
		Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
1	Collateral obtained by taking possession classified as PP&E	-	-	-	-	-	-
2	Collateral obtained by taking possession other than that classified as PP&E	30,648,921	-21,262,489	4,336,542	-4,220,131	-	-
3	Residential immovable property	-	-	-	-	-	-
4	Commercial immovable property	-	-	-	-	-	-
5	Movable property (auto, shipping, etc.)	30,648,921	-21,262,489	4,336,542	-4,220,131	-	-
6	Equity and debt instruments	-	-	-	-	-	-
7	Other	-	-	-	-	-	-
8	Total	30,648,921	-21,262,489	4,336,542	-4,220,131	-	-

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EU CR1: Performing and non-performing exposures and related provisions

		Gross carrying amount/nominal amount					
		Performing exposures			Non-performing exposures		
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3
0	Cash balances at central banks and other demand deposits	3,402,605,619	3,402,605,619	-	-	-	-
1	Loans and advances	39,817,873,418	32,069,606,133	7,732,018,876	2,071,171,514	-	2,071,171,514
2	Central banks	-	-	-	-	-	-
3	General governments	392,669,801	356,318,662	36,351,139	157,836,616	-	157,836,616
4	Credit institutions	6,448,537,705	6,447,709,439	828,266	-	-	-
5	Other financial corporations	814,200,466	776,071,406	38,129,060	217,560	-	217,560
6	Non-financial corporations	23,152,970,632	17,528,148,558	5,608,573,665	1,520,508,574	-	1,520,508,574
7	<i>Of which SMEs</i>	14,344,827,080	11,784,612,398	2,543,966,273	1,122,824,284	-	1,122,824,284
8	Households	9,009,494,814	6,961,358,068	2,048,136,746	392,608,764	-	392,608,764
9	Debt securities	9,645,313,732	9,622,392,569	-	-	-	-
10	Central banks	-	-	-	-	-	-
11	General governments	9,622,392,569	9,622,392,569	-	-	-	-
12	Credit institutions	-	-	-	-	-	-
13	Other financial corporations	22,921,163	-	-	-	-	-
14	Non-financial corporations	-	-	-	-	-	-
15	Off-balance-sheet exposures	20,176,119,909	16,514,105,821	3,662,014,088	219,538,421	-	219,538,421
16	Central banks	-	-	-	-	-	-
17	General governments	438,134,951	438,134,951	-	-	-	-
18	Credit institutions	2,252,924,851	2,166,718,473	86,206,378	-	-	-
19	Other financial corporations	455,205,247	386,324,342	68,880,905	-	-	-
20	Non-financial corporations	16,592,807,779	13,227,857,442	3,364,950,337	214,784,360	-	214,784,360
21	Households	437,047,081	295,070,613	141,976,468	4,754,061	-	4,754,061
22	Total	69,639,307,059	58,206,104,523	11,394,032,964	2,290,709,935	-	2,290,709,935

EU CR1: Performing and non-performing exposures and related provisions (continued)

		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—accumulated impairment			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			
0	Cash balances at central banks and other demand deposits	-899,986	-899,986	-	-	-	-	-	-	
1	Loans and advances	-683,060,391	-255,698,976	-426,505,626	-1,490,430,134	-	-1,490,430,134	-	30,751,658,270	458,105,449
2	Central banks	-	-	-	-	-	-	-	-	-
3	General governments	-2,440,342	-1,628,052	-812,290	-113,904,886	-	-113,904,886	-	2,863,088	-
4	Credit institutions	-579,751	-579,448	-303	-	-	-	-	5,870,932,929	-
5	Other financial corporations	-4,725,332	-4,633,471	-91,861	-153,887	-	-153,887	-	429,216,839	58,153
6	Non-financial corporations	-446,574,743	-178,866,003	-266,852,951	-1,172,223,856	-	-1,172,223,856	-	17,844,672,448	325,664,961
7	Of which SMEs	-261,541,230	-144,918,658	-115,766,783	-876,086,089	-	-876,086,089	-	12,059,817,997	232,679,101
8	Households	-228,740,223	-69,992,002	-158,748,221	-204,147,505	-	-204,147,505	-	6,603,972,966	132,382,335
9	Debt securities	-2,776,876	-2,776,876	-	-	-	-	-	-	-
10	Central banks	-	-	-	-	-	-	-	-	-
11	General governments	-2,776,876	-2,776,876	-	-	-	-	-	-	-
12	Credit institutions	-	-	-	-	-	-	-	-	-
13	Other financial corporations	-	-	-	-	-	-	-	-	-
14	Non-financial corporations	-	-	-	-	-	-	-	-	-
15	Off-balance-sheet exposures	-62,742,479	-17,964,035	-44,778,444	-135,091,328	-	-135,091,328	-	5,468,283,758	33,371,376
16	Central banks	-	-	-	-	-	-	-	-	-
17	General governments	-134,543	-134,543	-	-	-	-	-	-	-
18	Credit institutions	-234,502	-211,090	-23,412	-	-	-	-	-	-
19	Other financial corporations	-169,348	-169,348	-7,862	-	-	-	-	61,675,148	-
20	Non-financial corporations	-59,605,354	-193,929,995	-43,032,082	-134,324,641	-	-134,324,641	-	5,387,976,229	33,265,754
21	Households	-2,598,732	-3,365,419	-1,715,088	-766,687	-	-766,687	-	18,632,381	105,622
22	Total	-748,579,746	-276,439,887	-471,284,070	-1,625,521,462	-	-1,625,521,462	-	36,219,942,028	491,476,825

EU CR1-A - Maturity of exposures

Description	NET EXPOSURE VALUE					
	ON DEMAND	<= 1 YEAR	> 1 YEAR <= 5 YEARS	> 5 YEARS	NO STATED MATURITY	TOTAL
1 Loans and advances	2,191,865,096	14,596,927,421	11,657,143,629	11,205,622,451	63,995,810	39,715,554,407
2 Debt securities	-	770,294,201	4,456,863,888	4,415,378,767	-	9,642,536,856
3 Total as at 12.31.2021	2,191,865,096	15,367,221,622	16,114,007,517	15,621,001,218	63,995,810	49,358,091,263

6.4 Exposures subject to measures applied in response to the COVID-19 crisis

Since the outbreak of the COVID-19 crisis, national governments and EU bodies have taken steps to address and mitigate the negative systemic impact of the pandemic on the EU banking sector. In accordance with EBA/GL/2020/07 issued on 2.06.2020, UniCredit Bank reports as follows:

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Template 1: Information on loans and advances subject to legislative and non-legislative moratoria

		Number of obligors	Gross carrying amount						
				Performing			Non performing		
					Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: defaulted
1	Loans and advances for which moratorium was offered	17,112	3,832,207,770						
2	Loans and advances to which moratorium was applied	9,920	3,773,553,713	3,196,131,366	123,998,364	1,775,806,672	577,422,347	344,133,737	307,970,650
3	of which: Households	7,828	726,588,980	596,518,054	11,336,588	294,810,263	130,070,926	72,704,712	75,613,000
4	of which: Collateralised by residential immovable property		513,208,274	450,504,261	5,961,589	196,122,136	62,704,013	29,929,996	39,580,559
5	of which: Non-financial corporations	2,039	2,837,446,923	2,390,095,502	112,627,579	1,480,962,212	447,351,421	271,429,026	232,357,650
6	of which: Small and Medium-sized Enterprises	2,005	1,571,365,733	1,228,549,226	112,627,579	483,402,564	342,816,507	190,928,815	173,300,238
7	of which: Collateralised by commercial immovable property		1,987,080,498	1,672,849,204	71,254,528	1,322,092,356	314,231,295	197,640,947	199,851,374

Template 1: Information on loans and advances subject to legislative and non-legislative moratoria (continued)

		Accumulated impairment, accumulated negative changes in fair value due to credit risk							Gross carrying amount
			Performing			Non-performing		Inflows to non-performing exposures	
				Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)	Of which: exposures with forbearance measures	Of which: defaulted		
1	Loans and advances for which moratorium was offered								
2	Loans and advances to which moratorium was applied	-549,470,996	-156,244,595	-6,792,008	-129,920,212	-393,226,400	-239,022,883	-237,216,922	61,705,829
3	of which: Households	-100,673,013	-22,662,820	-1,532,589	-21,438,057	-78,010,194	-49,459,262	-51,949,971	8,732,125
4	of which: Collateralised by residential immovable property	-40,837,433	-11,475,350	-406,670	-11,021,140	-29,362,084	-15,248,806	-19,033,064	3,606,855
5	of which: Non-financial corporations	-447,493,870	-132,277,662	-5,259,043	-108,481,781	-315,216,208	-189,563,622	-185,266,951	52,973,704
6	of which: Small and Medium-sized Enterprises	-288,159,918	-44,180,389	-5,259,043	-21,755,525	-243,979,529	-137,375,296	-142,165,493	50,635,377
7	of which: Collateralised by commercial immovable property	-338,258,067	-104,594,718	-3,268,793	-101,318,852	-233,663,348	-146,726,607	-161,126,344	35,975,646

Template 2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria

			Gross carrying amount					
			Of which: legislative moratoria	Residual duration of moratoria				
				<= 3 months	3 - 6 months	6 - 9 months	9 - 12 months	> 1 year
1	Loans and advances subject to moratoria	3,773,553,713	-	-	-	-	-	
2	of which: Households	726,588,980	-	-	-	-	-	
3	of which: Collateralised by residential immovable property	513,208,274	-	-	-	-	-	
4	of which: Non-financial corporations	2,837,446,923	-	-	-	-	-	
5	of which: Small and Medium-sized Enterprises	1,571,365,733	-	-	-	-	-	
6	of which: Collateralised by commercial immovable property	1,987,080,498	-	-	-	-	-	

Template 3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis

	Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
		of which: forborne	Public guarantees received	Inflows to non-performing exposures
Newly originated loans and advances subject to public guarantee schemes	1,891,282,172	6,604,098	1,807,312,191	-
of which: Households	14,003,446	-	-	-
of which: Collateralised by residential immovable property	-	-	-	-
of which: Non-financial corporations	1,877,278,727	6,604,098	1,786,571,416	-
of which: Small and Medium-sized Enterprises	1,836,293,497	-	-	-
of which: Collateralised by commercial immovable property	-	-	-	-

6.5 Expected Credit Loss – Approaches and Methods Expected Credit Loss and Forward Looking Information – Approaches and Methods

For Expected Credit Loss (ECL) calculation there are applicable two different approaches: “collective” approach and “individual” approach.

The approach generic named “collective” (ECL calculated at the level of group financial assets), represented by expected credit losses for the next 12 months or / and expected losses for lifetime.

Through collective approach, the approach is applied to a portfolio through its division into risk groups with similar characteristics. This approach is used for both the Retail Loan portfolio and the Corporate Portfolio.

In order to meet the requirements of the standard, the Group has developed specific models to calculate expected loss based on PD, LGD and EAD parameters, used for regulatory purposes and adjusted in order to ensure consistency with the accounting regulations. In this context “forward looking” information was included through the elaboration of specific scenarios.

The Stage Allocation model is a key aspect of the new accounting model required to calculate expected credit losses. The Stage Allocation model is based on a combination of relative and absolute elements. The main elements are:

- comparison, for each transaction, between PD as measured at the time of origination and PD as at the reporting date, both calculated according to internal models, through thresholds set in such a way as to consider all key variables of each transaction that can affect the bank's expectation of PD changes over time (e.g. age, maturity, PD level at the time of origination). In 2021 the transfer logic model was refined for local portfolios (Corporate, SME and Private Individuals) bringing a lifetime perspective with regard to risk of default and replaces the methodological approach that had a 1-year perspective, in order to better capture into stage allocation the significant increase in credit risk;
- absolute elements such as the law requirements (e.g. 30 days past-due);
- additional internal evidence (e.g. Forborne classification).
- A 3 months probation period meaning the exposures can return to Stage 1 only after 3 months have passed from the moment when the conditions of Stage 2 allocation are not fulfilled anymore.

Individual approach is a process of measurement of exposure impairment at transaction level or for at the client level. According to IFRS9, individual assessment is mandatory for individually significant exposures and may also be used to assess insignificant exposures.

The individual assessment process has been divided into 2 steps:

- Identification of individually significant exposures and/or exposures of clients which may be individually assessed
- Individual estimation of ECL level for the respective exposures.

Individually significant exposures are considered to be the following:

- all exposures to banks, countries and sovereigns;
- all exposures to corporate defaulted clients (clients with rating 8-, 9, 10) which exceed the amount of EUR 1.000.000;
- all exposures to SME defaulted clients (rating 8-, 9, 10), exposures which exceed the amount of EUR 250.000;
- all loans granted to private individuals & private banking defaulted clients (rating 8-, 9, 10) with exposures exceeding the amount of EUR 250.000, for which at least one default event has been identified ; in some particular situations, case by case, the individually analysis can be applied also for exposures over than

EUR 50.000; all clients/transactions whose risk profile cannot be assessed based on statistical parameters at the portfolio level or for the cases that the individual assessment is necessary.

Thresholds mentioned above refer to current total exposure (considering bank balance sheet) for a client / group of clients, including also off-balance exposure.

For each significant individual transaction where a default event was identified, based on objective evidence of impairment, the value of the future cash flows will be determined.

The estimated value to be recovered is represented by the value of the future cash flows and payments, considering within the analyses all available information about the transaction/client.

The expected credit loss deriving from the parameters described above considers macroeconomic forecasts through the application of multiple scenarios to the “forward looking” components in order to compensate the partial non-linearity naturally present in the correlation between macroeconomic changes and credit risk. Specifically, the non-linearity effect was incorporated through the estimation of an overlay factor directly applied to the portfolio Expected Credit Loss.

The process defined to include macroeconomic multiple scenarios is fully consistent with macroeconomic forecast processes used by the Group for additional risk management objectives (as for example processes adopted to calculate expected credit losses from macroeconomic forecasts based on EBA stress test and ICAAP Framework) and also took advantage of independent UniCredit Research function.

UniCredit Group has selected three macroeconomic scenarios to determine the forward looking component, a baseline scenario, a positive scenario and a negative scenario. The probabilities are set at 55% for the baseline scenario, 40% for the negative (pandemic “mild”) scenario and 5% for the positive scenario.

The Group applies probabilities to the forecast scenarios identified. The base case scenario is the single most – likely outcome and consists of information used by the Group for strategic planning and budgeting. The table below summarizes the main macroeconomic indicators included in the baseline economic scenarios used at 31 December 2021:

Country	Macroeconomic scenario	2022	2023	2024
Romania	Real GDP, yoy % change	5.0	4.0	4.0
Romania	Inflation (CPI) yoy, eop	3.3	3.4	2.5
Romania	Unemployment rate, %	4.5	4.0	3.8
Romania	Short term rate, eop	1.84	2.04	2.14
Romania	Long-term interest rates 10y (%)	4.0	3.7	3.5
Romania	House Price Index, yoy % change	7.0	5.0	5.0

Following first implementation during 2020 of Forward Looking Information concept per industries, in order to better capture the specific dynamic of each sector during COVID 19 pandemic period, the Bank continued the recurrent update of industry factor during 2021.

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

The template presents the changes in an institution’s stock of non-performing loans and advances and related net accumulated recoveries.

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

	Gross carrying amount	Related net accumulated recoveries
1	Initial stock of non-performing loans and advances 31.12.2020	2,262,345,862
2	Inflows to non-performing portfolios	869,094,445
3	Outflows from non-performing portfolios	-1,060,268,793
4	Outflow to performing portfolio	-131,110,720
5	Outflow due to loan repayment, partial or total	-588,331,061

		Gross carrying amount	Related net accumulated recoveries
6	Outflow due to collateral liquidations	-	-
7	Outflow due to taking possession of collateral	-47,839,376	-
8	Outflow due to sale of instruments	-57,083,834	17,983,485
9	Outflow due to risk transfers	-	-
10	Outflows due to write-offs	-107,012,486	
11	Outflow due to other situations	-88,878,495	
12	Outflow due to reclassification as held for sale	-	
13	Final stock of non-performing loans and advances 31.12.2021	2,071,171,514	

6.6 Risk Weighted Asset (RWA) – Internal Ratings Based (IRB) by internal rating grade

The internal models used in the IRB approach, for which the Bank has obtained approval, are the following:

- local rating model used for Corporate clients or small and medium companies with yearly turnover over than EUR 3 million at individual or group level, but not more than EUR 500 million for two consecutive reporting dates;
- group rating model for multinational companies with yearly turnover over than EUR 500 million;
- group rating model for banks;
- group rating model for sovereign and central banks.

The Bank uses internal rating models for estimation of probability of default. The structure of internal ratings is presented below:

Exposure Class	Rating System	Type
Central governments and central banks	Sovereign (PD)	Group Model
Institutions	Banks (PD)	Group Model
Corporate – Multinationals	Multinational (PD)	Group Model
Corporate (excluding Real Estate)	Mid Corporate (PD)	Local Model

Rating Scale – relationship between internal and external ratings

Rating Class	Rating Notch	S&P	Moody's	Fitch
1		AAA/AA+...AA	Aaa/Aa1...Aa3	AAA / AA+
2		A+ ... A-	A1 ... A3	A+ ...A-
3		BBB+/BBB	Baa1/Baa2	BBB+/BBB
4		BBB-/BB+	Baa3... Ba1	BBB-/BB+
5		BB	Ba2	BB
6		BB/B+	Ba3/B1	BB/B+
7		B	B2	B
8	8+	B-	B3	B-
	8	CCC/CC	Caa/Ca	CCC/CC
	8-			
9	9			
10	10			

Internal rating models and risk estimates are used for calculating risk-weighted exposure and also for other purposes related to credit risk management: strategies definition, budgeting process, assessment process, decision process, pricing, monitoring, reporting and portfolio management, stress testing.

The inputs for risk parameters estimates should be essentially the same both, for credit management purposes and for regulatory capital requirement calculation purposes. Any differences between the ratings and risk parameter estimates used in calculating capital requirements and the final parameters used internally shall rely on a well-documented rationale.

In accordance with internal regulation and taking into account Group guidelines, the Bank implemented processes for the development of internal rating models, and also processes that ensure a periodical cycle for internal model validation, that include monitoring of model performance and stability, review of model specification, and testing of model outputs against outcomes.

Any rating model presumes the following stages:

- rating model development
- initial validation
- monitoring of the rating model
- rating model refinement
- on-going validation

At the Bank level, there are in place robust systems for validation of the accuracy and consistency of rating systems and processes, as well as estimation of all relevant risk parameters, both by verifying on a regular basis the performance of the internal rating models used to calculate the weighted assets at risk assessment in order to determine the minimum capital requirements for credit risk, as well as, by ensuring the independence of the credit rating validation function from the rating system modeling function.

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

The below template presents the exposure classes according to PD grades. The table does not include amount classified as other assets (Right of Use, PPE, equity investments, deferred tax, etc.).

Exposure class	PD Scale	Original on-balance- sheet gross exposures	Off- balance-sheet exposures pre-CCF	Average CCF	EAD post CRM and post CCF	Average PD	Number of obligors
Central Governments or Central Bank							
	0.00 to <0.15	-	473,612	0.5000	236,806	0.0000	1
	0.15 to <0.25	-	-	-	-	0.0000	-
	0.25 to <0.50	-	-	-	-	0.0000	-
	0.50 to <0.75	-	-	-	-	0.0000	-
	0.75 to <2.50	-	-	-	-	0.0000	-
	2.50 to <10.00	-	-	-	-	0.0000	-
	10.00 to <100.00	-	-	-	-	0.0000	-
	100.00 (Default)	-	-	-	-	0.0000	-
	Subtotal	-	473,612	0.5000	236,806	0.0000	1
Institutions							
	0.00 to <0.15	553,731,627	1,331,770,272	0.4900	1,210,777,159	0.0010	58
	0.15 to <0.25	225,529,988	725,197,746	0.4900	584,048,053	0.0018	13
	0.25 to <0.50	35,801,211	119,011,761	0.5000	132,905,294	0.0036	13
	0.50 to <0.75	-	11,844,144	0.5000	5,922,072	0.0062	2
	0.75 to <2.50	26,551,434	62,823,981	0.4200	88,549,115	0.0197	9
	2.50 to <10.00	-	-	0.5000	99,608,686	0.0471	-
	10.00 to <100.00	-	-	-	11,740,414	0.1150	-
	100.00 (Default)	-	-	0.5000	2,162,320	1.0000	-
	Subtotal	841,614,261	2,250,647,904	0.4886	2,135,713,115	0.0060	95
Retail – SME							
	0.00 to <0.15	48,352,080	115,148,469	0.0500	49,896,174	0.0010	14
	0.15 to <0.25	46,422,289	28,838,051	0.2400	53,254,046	0.0021	15
	0.25 to <0.50	885,639,347	863,459,101	0.1600	870,724,507	0.0040	427
	0.50 to <0.75	476,977,074	509,891,155	0.1700	474,850,991	0.0067	246
	0.75 to <2.50	3,516,380,144	2,226,652,726	0.2300	3,407,069,847	0.0171	1,479
	2.50 to <10.00	2,338,816,432	1,273,106,161	0.2000	2,156,959,631	0.0454	1,178
	10.00 to <100.00	323,431,060	104,920,899	0.4000	324,570,965	0.1417	175
	100.00 (Default)	555,440,547	84,577,970	0.2200	571,406,199	1.0000	286
	Subtotal	8,191,458,973	5,206,594,533	0.2045	7,908,732,359	0.0987	3,820
Corporate-Other							
	0.00 to <0.15	724,079,538	3,183,216,180	0.2100	1,407,842,590	0.0010	104
	0.15 to <0.25	136,381,930	1,072,268,558	0.2400	390,727,315	0.0021	50
	0.25 to <0.50	868,965,116	1,792,597,005	0.2900	1,380,074,201	0.0035	121
	0.50 to <0.75	323,863,546	361,080,044	0.2000	395,854,214	0.0060	44
	0.75 to <2.50	3,146,276,501	2,076,247,936	0.3000	3,736,777,170	0.0152	248
	2.50 to <10.00	757,828,433	407,391,701	0.2600	820,742,300	0.0430	169
	10.00 to <100.00	265,022,900	99,761,247	0.1300	264,674,398	0.1211	47
	100.00 (Default)	336,419,884	110,985,692	0.3400	372,548,985	1.0000	34
	Subtotal	6,558,837,848	9,103,548,362	0.2524	8,769,241,174	0.0577	817
Total (all portfolio)		15,591,911,082	16,561,264,411	0.2613	18,813,923,454	0.1624	4,733

EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range (continued)

Exposure class	PD Scale	Average LGD	Average maturity	RWAs	RWA density	EL	Value adjustments and provisions
Central Governments or Central Bank							
	0.00 to <0.15	-	2.5	-	-	0	-
	0.15 to <0.25	-	-	-	-	-	-
	0.25 to <0.50	-	-	-	-	-	-
	0.50 to <0.75	-	-	-	-	-	-
	0.75 to <2.50	-	-	-	-	-	-
	2.50 to <10.00	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-
	100.00 (Default)	-	-	-	-	-	-
	Subtotal	-	2.5	-	-	-	-
Institutions							
	0.00 to <0.15	0.4179	2.5	473,679,256	0.3912	522,490	-182,643
	0.15 to <0.25	0.4104	2.5	271,606,646	0.4650	418,583	-130,280
	0.25 to <0.50	0.4197	2.5	66,460,149	0.5001	147,639	-17,391
	0.50 to <0.75	0.3700	2.5	3,950,317	0.6670	13,591	-1,448
	0.75 to <2.50	0.4327	2.5	71,204,971	0.8041	397,553	-87,340
	2.50 to <10.00	0.4500	2.5	38,133,527	0.3828	65,480	-
	10.00 to <100.00	0.4500	2.5	4,552,369	0.3878	10,164	-
	100.00 (Default)	-	2.5	1,166,287	0.5394	1,491	-
	Subtotal	0.4177	2.5	930,753,522	0.4358	1,576,990	-419,102
Retail - SME							
	0.00 to <0.15	0.4487	2.5	11,378,024	0.2280	23,430	-217,436
	0.15 to <0.25	0.4451	2.5	17,852,388	0.3352	49,886	-494,846
	0.25 to <0.50	0.4366	2.5	377,610,627	0.4337	1,506,156	-6,514,432
	0.50 to <0.75	0.4419	2.5	262,383,509	0.5526	1,402,907	-3,789,898
	0.75 to <2.50	0.4345	2.5	2,542,273,569	0.7462	25,263,137	-35,676,408
	2.50 to <10.00	0.4280	2.5	2,049,846,108	0.9503	41,721,189	-63,219,911
	10.00 to <100.00	0.4064	2.5	425,616,153	1.3113	18,899,950	-20,658,381
	100.00 (Default)	-	2.5	-	-	248,489,592	-532,648,821
	Subtotal	0.4010	2.5	5,686,960,378	0.7191	337,356,247	-663,220,133
Corporate-Other							
	0.00 to <0.15	0.4488	2.5	448,586,647	0.3186	661,660	-10,547,322
	0.15 to <0.25	0.4343	2.5	178,815,416	0.4576	350,808	-4,114,798
	0.25 to <0.50	0.4424	2.5	840,792,816	0.6092	2,145,288	-12,180,839
	0.50 to <0.75	0.4333	2.5	304,138,139	0.7683	1,030,709	-1,259,097
	0.75 to <2.50	0.4425	2.5	4,065,062,679	1.0879	25,108,481	-27,173,505
	2.50 to <10.00	0.4306	2.5	1,180,385,306	1.4382	15,055,070	-21,864,983
	10.00 to <100.00	0.4392	2.5	563,682,846	2.1297	14,113,427	-13,644,749
	100.00 (Default)	-	2.5	-	-	161,130,067	-333,931,843
	Subtotal	0.4227	2.5	7,581,463,850	0.8646	219,595,511	-424,717,136
Total (all portfolio)		0.3104	2.5	14,199,177,751	0.7547	558,528,748	-1,088,356,371

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EU CCR4 – IRB approach – CCR exposures by portfolio and PD scale

The template presents relevant parameters used for the calculation of CCR capital requirements for IRB models.

	PD scale	EAD post CRM	Average PD	Number of obligors	Average LGD	Average maturity	RWAs	RWA density
Retail								
	0.00 to <0.15	-	-	-	-	-	-	-
	0.15 to <0.25	-	-	-	-	-	-	-
	0.25 to <0.50	-	-	-	-	-	-	-
	0.50 to <0.75	-	-	-	-	-	-	-
	0.75 to <2.50	-	-	-	-	-	-	-
	2.50 to <10.00	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (Default)	-	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-	-
Corporate-Other								
	0.00 to <0.15	3,183,961	0.0015	2	0.4500	2.50	1,259,067	0.3954
	0.15 to <0.25	2,504,287	0.0020	1	0.4500	2.50	1,162,116	0.4641
	0.25 to <0.50	5,901,442	0.0041	4	0.4500	2.50	3,926,031	0.6653
	0.50 to <0.75	7,494	0.0067	1	0.4500	2.50	6,283	0.8384
	0.75 to <2.50	5,895,246	0.0190	10	0.4500	2.50	6,963,830	1.1813
	2.50 to <10.00	1,638,546	0.0416	9	0.4500	2.50	2,452,480	1.4967
	10.00 to <100.00	3,968,732	0.1147	3	0.4500	2.50	8,502,536	2.1424
	100.00 (Default)	127,043	1.0000	2	-	2.50	-	-
	Subtotal	23,226,750	0.1487	32	0.3938	2.50	24,272,343	0.8979
Corporate-SME								
	0.00 to <0.15	598,826	0.0010	1	0.4500	2.50	140,221	0.2342
	0.15 to <0.25	-	-	-	-	-	-	-
	0.25 to <0.50	7,478,851	0.0039	11	0.4500	2.50	3,344,414	0.4472
	0.50 to <0.75	2,686,769	0.0067	3	0.4500	2.50	1,532,618	0.5704
	0.75 to <2.50	7,242,952	0.0165	43	0.4500	2.50	5,585,932	0.7712
	2.50 to <10.00	5,712,491	0.0562	26	0.4500	2.50	6,305,071	1.1037
	10.00 to <100.00	129,872	0.1563	4	0.4500	2.50	189,505	1.4592
	100.00 (Default)	3,111,278	1.0000	8	-	2.50	-	-
	Subtotal	26,961,038	0.1551	96	0.3375	2.19	17,097,761	0.5732
Institutions								
	0.00 to <0.15	6,019,813,546	0.0015	6	0.0111	0.55	75,231,143	0.0125
	0.15 to <0.25	7,335,184	0.0017	1	0.4500	2.50	3,078,508	0.4197
	0.25 to <0.50	6,190,746	0.0028	2	0.4500	2.50	3,452,002	0.5576
	0.50 to <0.75	-	-	-	-	-	-	-
	0.75 to <2.50	363,510	0.0092	1	0.4500	2.50	344,634	0.9481
	2.50 to <10.00	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (Default)	-	-	-	-	-	-	-
	Subtotal	6,033,702,985	0.0019	10	0.1701	1.01	82,106,288	0.2422
	Total (all portfolio)	6,083,890,773	0.0764	138	0.2253	1.42	123,476,392	0.4284

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

Consolidated

		RWA amounts	Capital requirements
1	RWAs as at the end of the previous reporting period 30.09.2021	12,157,296,366	972,583,709
2	Asset size	2,107,064,579	168,565,166
3	Asset quality	-	-
4	Model updates	-78,795,781	-6,303,663
5	Methodology and policy	-	-
6	Acquisitions and disposals	-	-
7	Foreign exchange movements	13,612,638	1,089,011
8	Other	-	-
9	RWAs as at the end of the reporting period 31.12.2021	14,199,177,801	1,135,934,224

EU CR10 – IRB (specialized lending and equities)

The template presents quantitative information regarding the capital instruments exposures using IRB approach.

Specialized lending							
Regulatory categories	Remaining maturity	On-balance-sheet amount	Off-balance-sheet amount	Risk weight	Exposure amount	RWAs	Expected losses
Category 1	Less than 2.5 years	-	-	50%	-	-	-
	Equal to or more than 2.5 years	-	-	70%	-	-	-
Category 2	Less than 2.5 years	-	-	70%	-	-	-
	Equal to or more than 2.5 years	-	-	90%	-	-	-
Category 3	Less than 2.5 years	-	-	115%	-	-	-
	Equal to or more than 2.5 years	-	-	115%	-	-	-
Category 4	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Category 5	Less than 2.5 years	-	-	-	-	-	-
	Equal to or more than 2.5 years	-	-	-	-	-	-
Total	Less than 2.5 years	-	-		-	-	-
	Equal to or more than 2.5 years	-	-		-	-	-
Equities under the simple risk-weighted approach							
Categories		On-balance-sheet amount	Off-balance-sheet amount	Risk weight	Exposure amount	RWAs	Capital requirements
Private equity exposures		-	-	190%	-	-	-
Exchange-traded equity exposures		-	-	290%	-	-	-
Other equity exposures		52,842,798	-	370%	52,842,798	195,518,352	15,641,468
Total		52,842,798	-		52,842,798	195,518,352	15,641,468

6.7 Risk Weighted Assets - Back-testing of PD per exposure class

The ex-post testing of the risk weighted assets is performed during the validation of the internal rating systems.

EU CR9 – IRB approach – Back-testing of PD per exposure class

Exposure class	PD scale	Number of obligors at the end of the year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			of which: number of obligors which defaulted during the year				
Institutions	0.00 to <0.15	58	0	0.00%	0.10%	0.10%	0.00%
	0.00 to <0.10	21	0	0.00%	0.08%	0.07%	0.00%
	0.10 to <0.15	37	0	0.00%	0.14%	0.13%	0.00%
	0.15 to <0.25	13	0	0.00%	0.18%	0.19%	0.00%
	0.25 to <0.50	13	0	0.00%	0.36%	0.36%	0.00%
	0.50 to <0.75	2	0	0.00%	0.62%	0.61%	0.00%
	0.75 to <2.50	9	0	0.00%	1.97%	1.67%	0.00%
	0.75 to <1.75	3	0	0.00%	1.28%	1.33%	0.00%
	1.75 to <2.5	6	0	0.00%	2.08%	2.02%	0.00%
	2.50 to <10.00	0	0	0.00%	0.00%	0.00%	0.00%
	2.5 to <5	0	0	0.00%	0.00%	0.00%	0.00%
	5 to <10	0	0	0.00%	0.00%	0.00%	0.00%
	10.00 to <100.00	0	0	0.00%	0.00%	0.00%	0.00%
	10 to <20	0	0	0.00%	0.00%	0.00%	0.00%
	20 to <30	0	0	0.00%	0.00%	0.00%	0.00%
30.00 to <100.00	0	0	0.00%	0.00%	0.00%	0.00%	
100.00 (Default)	0	0	0.00%	0.00%	0.00%	0.00%	

Exposure class	PD scale	Number of obligors at the end of the year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			of which: number of obligors which defaulted during the year				
Corporates - SME	0.00 to <0.15	14	0	0.00%	0.10%	0.11%	0.00%
	0.00 to <0.10	4	0	0.00%	0.08%	0.06%	0.00%
	0.10 to <0.15	10	0	0.00%	0.11%	0.13%	0.00%
	0.15 to <0.25	15	0	0.00%	0.21%	0.20%	0.00%
	0.25 to <0.50	427	2	1.10%	0.40%	0.41%	0.95%
	0.50 to <0.75	246	4	2.17%	0.67%	0.63%	0.70%
	0.75 to <2.50	1479	8	0.86%	1.71%	1.54%	1.11%
	0.75 to <1.75	1013	3	0.47%	1.38%	1.25%	1.12%
	1.75 to <2.5	466	5	1.68%	2.30%	2.16%	1.13%
	2.50 to <10.00	1178	14	1.73%	4.54%	4.66%	2.49%
	2.5 to <5	684	3	0.55%	3.70%	3.66%	1.63%
	5 to <10	494	11	4.10%	6.58%	6.69%	4.24%
	10.00 to <100.00	175	2	4.55%	14.17%	17.00%	7.95%

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Exposure class	PD scale	Number of obligors at the end of the year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			of which: number of obligors which defaulted during the year				
	10 to <20	141	2	6.25%	11.39%	12.47%	8.22%
	20 to <30	34	0	0.00%	28.40%	21.05%	5.93%
	30.00 to <100.00	0	0	0.00%	0.00%	31.73%	0.00%
	100.00 (Default)	286	0	0.00%	100.00%	100.00%	0.00%

Exposure class	PD scale	Number of obligors at the end of the year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			of which: number of obligors which defaulted during the year				
Corporates - Other	0.00 to <0.15	<u>104</u>	<u>0</u>	<u>0.00%</u>	<u>0.10%</u>	<u>0.09%</u>	<u>0.00%</u>
	0.00 to <0.10	42	0	0.00%	0.07%	0.06%	0.00%
	0.10 to <0.15	62	0	0.00%	0.12%	0.12%	0.00%
	0.15 to <0.25	50	0	0.00%	0.21%	0.20%	0.00%
	0.25 to <0.50	121	3	3.66%	0.35%	0.38%	1.23%
	0.50 to <0.75	44	0	0.00%	0.60%	0.63%	0.87%
	0.75 to <2.50	<u>248</u>	<u>0</u>	<u>0.00%</u>	<u>1.52%</u>	<u>1.42%</u>	<u>0.34%</u>
	0.75 to <1.75	182	0	0.00%	1.34%	1.19%	0.18%
	1.75 to <2.5	66	0	0.00%	2.27%	2.12%	0.61%
	2.50 to <10.00	<u>169</u>	<u>1</u>	<u>0.82%</u>	<u>4.30%</u>	<u>4.96%</u>	<u>0.79%</u>
	2.5 to <5	101	0	0.00%	3.72%	3.73%	0.31%
	5 to <10	68	1	1.82%	5.93%	6.45%	1.76%
	10.00 to <100.00	<u>47</u>	<u>0</u>	<u>0.00%</u>	<u>12.11%</u>	<u>14.30%</u>	<u>4.00%</u>
	10 to <20	42	0	0.00%	12.10%	12.82%	2.22%
	20 to <30	0	0	0.00%	0.00%	0.00%	10.00%
	30.00 to <100.00	4	0	0.00%	34.08%	30.63%	0.00%
100.00 (Default)	34	0	0.00%	100.00%	100.00%	0.00%	

6.8 Credit risk mitigation

The goal of providing collateral is to minimize the loss given default (credit risk) by diminishing the loss or risk transfer, as follows:

- For real collateral, financial or physical, the risk exposure is reduced by the expected revenue to be realized from collateral capitalization and, thus, losses can be reduced;
- For collateral provided by means of letters of guarantee or other personal guarantees, the risk is transferred to the protection provider.

The Bank established the accepted collateral types and also the conditions for the collateral acceptance.

For a better administration of all collateral instruments accepted in the credit process and for a better mitigation of associated risks, the Bank has implemented within internal credit management system, a specific collateral module where all accepted collateral instruments are adequately, uniformly recorded and managed in a structured manner. Adequate data quality is ensured by processes and controls supported by the system.

Collateral management system ensures:

- Monitoring and controlling of collaterals;
- Estimation of loss given default;
- Calculation of collateral recovery rates;
- Production of various portfolio analyses.

Considering the mitigation of risk exposure for determining the minimum capital requirements, the Bank is using eligible collaterals according to National Bank of Romania Regulation no. 5/20.12.2013 regarding prudential requirements for credit institutions and Regulation no. 575/2013 of European Parliament and Council regarding prudential requirements for credit institutions and investment companies and amending Regulation (UE) no.648 / 2012.

Collateral types accepted by the Bank as credit risk mitigation techniques for calculating the minimum capital requirements according to the standardized and FIRB approach Basel III, are presented below:

Collateral Category		Type of collateral
Direct Personal Guarantees		Guarantee / Surety
		Bill of exchange from third party
		Letter of comfort
		Risk sharing
Credit Derivatives		Credit Derivatives Instruments
Life Insurance		Pledge on life insurance with non-reducible surrender value
Financial collateral	Own	Pledge on securities deposits
		Pledge on cash collateral
		Pledge on gold
	Third Party	Pledge on third party cash collateral
Real Estate		First Rank Mortgage on Residential Real Estate occupied or rented by owner
		First rank mortgage on commercial real estate – offices and other commercial spaces
On Balance Sheet Netting		Not used in the Bank as credit risk mitigation technique

The tables provide information about collateralization of on and off balance credit exposure with the indication of the amount of the Collateral/Guarantees eligible for Credit Risk Mitigation purpose.

In detail, the table on Collaterals is broken down by collateral type, type of security with the indication of the rating (related to the client who is covered by the guarantee) and maturity (calculated as average of residual contractual maturities of payments, each weighted by the relative amount). The table on

Guarantees is broken down by type of guarantee (Credit Derivatives and Personal Guarantees) and type of issuer.

Policies and processes applied for evaluating and administrating real collaterals

The internal valuation of collaterals is carried out by experts, who have the required qualifications, ability, experience and competence to perform such a valuation and who are independent of the credit decision.

The valuation of the goods proposed as collateral shall be made by independent valuers approved by UniCredit Bank or by the Bank's internal valuers.

The internal and independent valuers must be certified by A.N.E.V.A.R. and the valuation reports need to comply with relevant Valuation Standards in force.

The valuation report is the document that attests the valuation result, namely the material value of the collateral depending on which the collateral coverage corresponding to a lending operation is calculated.

The valuation value of the collateral accepted by the Bank is the market value.

If collateral is accepted in a currency that differs from that of the credit and/or if the collateral is not available for the entire credit maturity, under certain conditions, for minimum capital requirements calculation purpose, the collateral values are to be reduced accordingly as per Basel III legal requirements.

During loans lifetime, the collaterals are periodically reassessed according to provisions of National Bank of Romania Regulation no.5/2013 on prudential requirements for credit institutions and Regulation (EU) no 575/ 2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012.

In case of non-performing exposure, the revaluation of the collateral is done on classification date as NPE, or in max. 3 months if the current evaluation report is still valid, not older than one year.

The reassessment process of the collaterals is periodically monitored, the report related to the status of this process is submit quarterly to the Operative Risk Management Committee.

Where the collaterals are not reassessed according to the already set up terms depending on collateral type, these collaterals are not considered eligible from credit risk mitigation techniques perspective.

Distribution of guarantees on credit exposures to banks and customers

	Type	Issuer with indication of the country where the collateral is booked	Rating	Stock 2021_12			
				With banks		With customers	
				Fair value	o.w. eligible for CRM purposes	Fair value	o.w. eligible for CRM purposes
Guarantees	Credit Derivatives	CLN		-	-	-	-
		Government and Central Banks	Investment grade	-	-	-	-
			Non Investment grade	-	-	-	-
			Unrated / not available	-	-	-	-
		Other Public Entities	Investment grade	-	-	-	-
			Non Investment grade	-	-	-	-
			Unrated / not available	-	-	-	-
		Banks	Investment grade	-	-	-	-
			Non Investment grade	-	-	-	-
			Unrated / not available	-	-	-	-
		Other Entities	Investment grade	-	-	-	-
			Non Investment grade	-	-	-	-
	Unrated / not available		-	-	-	-	
	Personal Guarantees	Governments and Central Banks	Investment grade	-	-	-	-
			Non Investment grade	-	-	-	-
			Unrated / not available	-	-	-	-
		Other Public Entities	Investment grade	-	-	-	-
			Non Investment grade	-	-	-	-
			Unrated / not available	-	-	-	-
		Banks	Investment grade	2,119,510,586	1,697,018,656	-	-
			Non Investment grade	81,682,184	65,403,751	-	-
			Unrated / not available	-	-	-	-
		Corporate / SMEs	Investment grade	-	-	1,978,108,127	442,699,703
Non Investment grade			-	-	4,416,689,578	2,341,296,305	
Unrated / not available	-		-	49,314,153	10,010,749		
Physical persons		-	-	151,818,896	151,818,896		

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Distribution of collaterals on credit exposures to banks and customers

	Type of collateral	Type of security with indication of the country where the collateral is booked	Rating	Maturity	Stock 2021_12			
					With banks		With customers	
					Fair value	o.w. eligible for CRM purposes	Fair value	o.w. eligible for CRM purposes
Collaterals	Pledge on Securities	Governments Bonds (Central Banks, MDB and International Organizations included)	Investment Grade	Short term (<5 years)	5,870,932,797	5,870,932,797	-	-
				(>= 5 years)	-	-	-	-
			Non Investment grade	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
			Unrated / not available	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
		Supervised Financial institution Bonds	Investment Grade	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
			Non Investment grade	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
			Unrated / not available	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
		Corporate Bonds	Investment Grade	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
			Non Investment grade	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
			Unrated / not available	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
		Other securities	Investment Grade	Short term (<5 years)	-	-	3,719,729	1,418,429
				(>= 5 years)	-	-	-	-
			Non Investment grade	Short term (<5 years)	-	-	-	-
				(>= 5 years)	-	-	-	-
			Unrated / not available	Short term (<5 years)	-	-	-	-
(>= 5 years)	-			-	-	-		
Pledge on Cash deposits				263,273	263,273	544,506,448	515,861,187	
Other pledges				-	-	5,298,902,754	4,663,546,946	
Properties				-	-	12,136,414,259	11,106,064,091	
Other assets				-	-	2,000,775,362	1,346,738,658	

The value of the collateral cannot exceed the book value of the secured exposures; therefore, the lower of the loan at the book value and the value of the collateral is displayed.

Credit risk mitigation techniques: standardized approach collaterals

	Amounts as at 31-Dec-2021			Amounts as at 31-Dec-2020		
	Financial collaterals	Other guarantees	Guarantees and credit derivatives	Financial collaterals	Other guarantees	Guarantees and credit derivatives
Exposures to or secured by central governments or central banks	-	-	-	-	-	-
Exposures to or secured by regional governments or local authorities	-	-	-	12,145	-	-
Exposures to or secured by public-sector bodies	-	-	-	-	-	-
Exposures to or secured by multilateral development banks	-	-	-	-	-	-
Exposures to or secured by international organizations	-	-	-	-	-	-
Exposures to or secured by authorities	263,273	-	-	-	-	-
Exposures to or secured by corporates and other parties	138,643,568	220,830,967	-	115,525,007	97,455,512	-
Retail exposures	44,638,216	918,392,202	-	45,670,840	558,018,164	-
Exposures secured by real estate collateral	-	-	-	-	-	-
Defaulted exposures	2,661,084	10,745,721	-	2,427,393	3,762,124	-
High-risk exposures	-	-	-	-	93,489	-
Exposures in the form of guaranteed bank bonds (covered bonds)	-	-	-	-	-	-
Short-term exposures to corporates and other parties or authorities	-	-	-	-	-	-
Exposures to Undertakings for Collective Investment (UCI)	-	-	-	-	-	-
Equity exposures	-	-	-	-	-	-
Other exposures	-	-	-	-	-	-
Total	186,206,142	1,149,968,890	-	163,635,384	659,329,289	-

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Risk mitigation techniques – IRB Approach

	Amounts as at 31-Dec-2021				Amounts as at 31-Dec-2020			
	Financial collaterals	Other eligible collaterals	Other guarantees	Guarantees and credit derivatives	Financial collaterals	Other eligible collaterals	Other guarantees	Guarantees and credit derivatives
IRB approach - foundation								
Exposures to or secured by central governments or central banks	473,612	-	-	-	-	-	-	-
Exposures to or secured by institutions, public and territorial entities and other entities	5,877,769,649	1,360,280,666	-	-	5,826,006,355	1,041,838,625	-	-
Exposures to or secured by corporate - SME	164,642,929	996,797,696	1,604,450,028	-	143,828,396	990,586,623	909,478,262	-
Exposures to or secured by corporate - Specialised lending	-	-	-	-	-	-	-	-
Exposures to or secured by corporate - Others	194,910,255	307,431,891	191,465,746	-	168,917,938	318,895,439	118,139,268	-
IRB approach – advanced								
Exposures to or secured by central governments or central banks	-	-	-	-	-	-	-	-
Exposures to or secured by institutions, public and territorial entities and other entities	-	-	-	-	-	-	-	-
Exposures to or secured by corporate - SME	-	-	-	-	-	-	-	-
Exposures to or secured by corporate - Specialised lending	-	-	-	-	-	-	-	-
Exposures to or secured by corporate - Others	-	-	-	-	-	-	-	-
Exposures secured with residential real estate property: SME	-	-	-	-	-	-	-	-
Exposures secured with residential real estate property: Individual	-	-	-	-	-	-	-	-
Qualified revolving retail exposures	-	-	-	-	-	-	-	-
Other retail exposures	-	-	-	-	-	-	-	-
Other retail exposures: Individual	-	-	-	-	-	-	-	-
Total	6,237,796,446	2,664,510,253	1,795,915,774	-	6,138,752,690	2,351,320,687	1,027,617,531	-

Policies and processes applied for evaluating and administrating real collateral

The internal valuation of collateral is carried out by experts, who have the required qualifications, ability, experience and competence to perform such a valuation and who are independent of the credit decision.

The valuation of the goods proposed as collateral shall be made by independent valuers approved by UniCredit Bank or by the Bank's internal valuers.

The internal and independent valuers must be certified by A.N.E.V.A.R. and the valuation reports need to comply with relevant Valuation Standards in force.

The valuation report is the document that attests the valuation result, namely the material value of the collateral depending on which the collateral coverage corresponding to a lending operation is calculated.

The valuation value of the collateral accepted by the Bank is the market value.

If collateral is accepted in a currency that differs from that of the credit and/or if the collateral is not available for the entire credit maturity, under certain conditions, for minimum capital requirements calculation purpose, the collateral values are to be reduced accordingly as per Basel III legal requirements.

During loans lifetime, the collateral is periodically reassessed according to provisions of National Bank of Romania Regulation no.5/2013 on prudential requirements for credit institutions and Regulation (EU) no 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012.

In case of on-performing exposure, the revaluation of the collateral is done on classification date as NPE, or in maximum 3 months if the current evaluation report is still valid, not older than one year.

The reassessment process of the collateral is periodically monitored, the report related to the status of this process is submitted quarterly to the Operative Risk Management Committee.

Where the collateral is not reassessed according to the already set up terms depending on collateral type, these collateral are not considered eligible from credit risk mitigation techniques perspective.

EU CR4 – Standardized approach – Credit risk exposure and CRM effects

	Exposure classes*	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
		On-balance-sheet amount	Off-balance-sheet amount	On-balance-sheet amount	Off-balance-sheet amount	RWAs	RWA density
1	Central governments or central banks	12,767,752,750	-	14,481,965,980	235,826,128	208,046,550	1.41%
2	Regional government or local authorities	436,141,451	437,526,796	436,141,451	218,689,159	263,048,174	40.17%
3	Public sector entities	-	-	-	-	-	0.00%
4	Multilateral development banks	-	-	334,948,979	14,035,822	-	0.00%
5	International organizations	-	-	-	-	-	0.00%
6	Institutions	659,579,277	101,244,834	697,179,966	18,479,033	656,297,001	91.71%
7	Corporates	4,751,055,253	1,973,263,667	4,644,263,340	605,556,506	4,780,402,013	91.06%
8	Retail	6,404,653,174	1,168,618,038	5,627,628,606	289,436,907	3,817,463,189	64.52%
9	Secured by mortgages on immovable property	6,608,377,371	103,556,381	6,608,377,372	10,297,812	2,509,741,829	37.92%
10	Exposures in default	428,405,007	15,922,998	414,827,809	2,990,624	425,151,541	101.76%
11	Exposures associated with particularly high risk	18,060,296	-	18,060,296	-	27,090,444	150.00%
12	Covered bonds	-	-	-	-	-	0.00%
13	Institutions and corporates with a short-term credit assessment	81,454	-	81,454	-	16,291	20.00%
14	Collective investment undertakings	-	-	-	-	-	0.00%
15	Equity	2,345,997	-	2,345,997	-	2,345,997	100.00%
16	Other items	100,737,981	-	100,737,981	-	100,730,615	99.99%
17	Total	32,177,190,011	3,800,132,714	33,366,559,231	1,395,311,991	12,790,333,644	36.79%

* The table does not include derivative exposures

EU CR3 – CRM techniques – Overview

The template presents the breakdown of the Group's carrying amount exposures by type of collateral held.

The guaranteed exposures are those exposures which have at least one mechanism of risk mitigation (real collaterals, financial guarantees, financial credit derivatives) associated to those exposures.

Instruments		Total exposures - Carrying amount, of which:	Unsecured exposures – Carrying Amount	Secured Exposures - Carrying amount, of which:	Secured Exposures by collateral	Secured Exposures by financial guarantees	Secured exposures by credit derivatives
1	Total loans	43,117,260,040	16,292,238,261	26,825,021,779	28,687,226,282	2,522,537,437	-
2	Total debt securities	9,642,536,856	1,668,912,534	-	-	-	-
3	Total exposures	52,759,796,896	17,961,150,795	26,825,021,779	28,687,226,282	2,522,537,437	-

7. EXPOSURE TO COUNTERPARTY RISK

7.1 Limits on exposures, policies for assessing counterparty credit risk and guarantee risk, management of wrong - way risk etc.

Counterparty credit risk is measured and monitored by an independent risk management unit using an internal model based on historical simulation.

Counterparty credit risk is classified into two categories:

- Pre-settlement risk - counterparty risk in connection with treasury transactions in which the counterparty defaults after entering into the transaction date and the transaction must be replaced at less favorable market conditions;
- Settlement risk - counterparty risk under treasury transactions in which the Bank performs a transaction (payment) on the settlement day, while the counterparty has not met its obligations yet.

Counterparty risk monitoring is based on a system of limits for individual counterparties and product groups (spot, derivatives, money market, securities and repo).

The Bank does not hold credit derivatives hedges.

7.2 Positive fair value of financial and credit derivatives, collateral held, value of CCF etc.

Details regarding the fair value of derivatives, notional value of trading contracts and notional value of hedging contracts that are taken into account in own funds requirements at consolidated level, are presented below:

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EU CCR1 – Analysis of CCR exposure by approach

		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)	-	-		1.40	-	-	-	-
EU-2	EU - Simplified SA-CCR (for derivatives)	-	-		1.40	-	-	-	-
1	SA-CCR (for derivatives)	35,552,129	143,027,118		1.40	250,010,947	251,940,476	250,010,947	158,898,152
2	IMM (for derivatives and SFTs)			-	1.45	-	-	-	-
2a	Of which securities financing transactions netting sets			-		-	-	-	-
2b	Of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c	Of which from contractual cross-product netting sets			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					5,871,420,742	5,871,420,742	5,871,420,742	-
5	VaR for SFTs					-	-	-	-
6	Total					6,121,431,689	6,123,361,219	6,121,431,689	158,898,152

EU CCR2 – CVA capital charge

		Exposure value	RWAs
1	Total portfolios subject to the advanced method	-	-
2	(i) VaR component (including the 3× multiplier)		-
3	(ii) SVaR component (including the 3× multiplier)		-
4	All portfolios subject to the standardised method	48,648,547	2,348,824
EU-4	Based on the original exposure method	-	-
5	Total subject to the CVA capital charge	48,648,547	2,348,824

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EU CCR5 - Composition of collateral for CCR exposures

	Collateral type	Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	-	-	-	-	-	-	-	-
2	Cash – other currencies	-	264,140	-	91,440,890	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-
4	Other sovereign debt	-	-	-	-	-	6,113,875,927	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	Total	-	264,140	-	91,440,890	-	6,113,875,927	-	-

EU CCR3 - Standardized approach – CCR exposures by regulatory portfolio and risk

	Exposure classes	RWA											Total	Of which unrated	
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others			
1	Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	International organizations	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	-	-	-	-	787,107	-	-	787,107	-	
7	Corporates	-	-	-	-	-	-	-	-	34,634,653	-	-	34,634,653	-	
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Total	-	-	-	-	-	-	-	-	35,421,760	-	-	35,421,760	-	

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EU CCR7 – RWA flow statements of CCR exposures under the IMM

The template presents the quarterly changes in the CCR RWAs determined under the IMM for CCR.

		RWA amounts	Capital requirements
1	RWAs as at the end of the previous reporting period (30.09.2021)	315,290	25,223
2	Asset size	-	-
3	Credit quality of counterparties	-315,290	25,223
4	Model updates (IMM only)	-	-
5	Methodology and policy (IMM only)	-	-
6	Acquisitions and disposals	-	-
7	Foreign exchange movements	-	-
8	Other	-	-
9	RWAs as at the end of the current reporting period (31.12.2021)	-	-

8. MARKET RISK

In UniCredit Bank, Market Risk management function is organized at centralized level in the Risk Division – Market Risk department.

According to Regulation no.5/2013 on prudential requirements for credit institutions, the following definitions are presented:

- **Market risk** is the risk of incurring on-balance and off-balance sheet losses due to adverse market movements in prices (such as, for example, the share prices, the interest rates, the foreign-exchange rates)
- **Interest rate risk** is the current or future risk of negative impact on profits and capital as a consequence of certain adverse changes of the interest rates
- **Liquidity risk** is the current or future risk of negative impact on profits and capital, determined by the credit institution's inability to meet its liabilities when they become due

The market risk management activity is regulated by a specific set of policies and procedures for the purpose of:

- Identifying, monitoring, analysis and controlling market risks: currency risk, interest rate and liquidity, according to Group standards and requirements of the National Bank of Romania through a system of limits for both the trading portfolio (trading book) and for positions outside the trading portfolio (banking book);
- Implementing the strategy of market risk management through appropriate policies and processes;
- Reporting of market risk issues to Bank's management.

Market Risk Management activity is performed according to legal regulations in force in Romania, norms and regulations issued by the National Bank of Romania (NBR) and internal regulations of UniCredit Bank, while the application of these regulations is harmonized with the Group Rules of UniCredit.

The market risk management strategy is prepared and implemented by applying the following **basic principles**:

- Market risk management is done through specific risk indicators and models: Value at risk (VaR) limits, Basis Point Value and Credit Point Value limits, fx position limits, as well as monitoring risk appetite framework defined according to internal policies and procedures;
- Exposure to market risk is generated only by Treasury and Finance (ALM) departments;
- Trading positions are held at current market value (mark-to-market). If specific revaluation models are used, they are validated independently;
- All relevant risk factors are identified and considered during the process of setting limits. The identification of risk factors is the responsibility of Market Risk and business lines;
- Specific events are considered in the stress scenarios, not as manual adjustments of volatilities of correlations among risk factors;
- Total VaR refers to the whole activity of the bank, not only to trading book positions, nevertheless Banking Book VaR and Trading Book VaR are calculated and monitored separately as well as per risk factors;
- Exposure to market risk (usage of limits, excesses) are reported in time and with regularity to the respective business lines, to the Management and the Group. Risk reports are generated for the total Bank and separately for each risk generating unit. Exposure to market risk limits are monitored for the UniCredit Group in Romania, as well as for UniCredit Consumer Financing (UCFin) and UniCredit Leasing (UCL), according to internal regulations.

The evolution of the main market risk indicators for VaR (Value at Risk) in 2021 is presented in the table below:

EUR million	Total VaR 99%	VaR FVtOCI	VaR FVtPL
Limit	28	15	1.5
End 2021	7.01	1.74	0.42
Average	10.42	1.74	0.45
Maximum	23.04	1.75	0.48
Minimum	6.48	1.72	0.42

The Bank considers the following adjustments:

- on a monthly basis: CVA (Credit Value Adjustment), FuVA (Funding Value Adjustment) and AVA (Additional Value Adjustment);
- on a quarterly basis: FVA (Fair Value Adjustment).

8.1 Price risk, Interest rate risk, exchange rate risk and credit spread

The trading book contains all positions on financial instruments and commodities which are held by a bank with the intention either for trading, or for economically hedging other elements from the trading book and which are either free of any restrictive clauses regarding trading or may be hedged.

Trading positions are those positions held in order to be resold in the short run and / or to benefit from short term differences between prices or changes in prices or interest rates. The term “positions” includes own positions and clients’ positions, as well as from operations as market maker

The **trading book** of UniCredit Bank contains the following financial products, which were approved by the Group:

- Derivatives exchange rate:
 - Outright Forwards and FX Swaps;
 - Plain Vanilla Options;
 - Exotic FX Options (Digitals and Barriers).
- Interest rate derivatives:
 - Interest Rate Swaps (IRS), Cross Currency Swaps (CCS);
 - Interest Rate Options (Caps, Floors, Collars).
- Commodities derivatives
 - Swaps, Forwards
 - Options
- Fixed income financial instruments

All other products are part of the Banking Book.

Derivatives are recorded at market value through the daily mark-to-market revaluation.

From the perspective of market risk, all derivatives transactions (except outright forwards and interest rate swaps) are closed back-to-back with another entity within the Group, in most cases, so not having open positions for UniCredit Bank trading activity.

A. Interest Rate Risk

Interest rate risk arising from Trading Book results from positions in derivative products or fixed income financial instruments of UniCredit Bank. All derivative client transactions (except FX Swaps and FX FWD Outright) are closed back-to-back with another entity owned by UniCredit Group.

Interest rate risk in Banking book is separately measured and monitored by VaR and BPV indicators, as well as Economic Value Sensitivity (measured against own funds tier 1) and Net Interest Income Sensitivity (measured against the NII budget).

Exposures to interest rate risk on positions in the banking book

UniCredit Bank measures and monitors this risk according to the UniCredit Group methodology within the framework of a Banking Book interest rate risk policy that establishes consistent methodologies and models and limits or thresholds to focus on, with regard to the sensitivity of net interest income and the Bank's economic value.

The main sources of banking book interest rate risk can be classified as follows:

- 1) **Gap risk:** arises from the term structure of banking book instruments, and describes the risk arising from the timing of instrument rate changes. Gap risk also encompasses: Repricing risk, defined as the risk of changes in interest rate earned at the time a financial contract's rate is reset. Repricing risk also refers to the yield curve risk, occurring when a shift in the yield curve affects the values of interest rate sensitive assets and interest rate bearing liabilities;
- 2) **Basis risk** can be broken down in:
 - **Tenor risk:** resulting from the imperfect correlation in the adjustment of the rates earned and paid on different instruments with otherwise similar rate change characteristics;
 - **Currency risk:** defined as the risk of potentially offsetting interest rate sensitivities arising from interest rate exposures in several currencies;
- 3) **Option risk:** risk resulting from option derivative positions or from the optional elements embedded in many bank positions.

Interest rate risk measurement includes:

a) Net Interest Income analysis

This may involve a constant analysis of the balance sheet, the impact on interest income may be maintained or simulated, assuming that positions remain constant over the period.

The simulation analysis includes the analysis of the impact on income from different shocks for the interest rates. Reference shock for a rate rise scenario is an instantaneous and parallel shock of +100bp. The shocks for the rate fall scenario are applied in an asymmetric way. The currencies to which a shock of -30bp is applied are: EUR, BGN, JPY, CHF and BAM. For HUF, whose rates are only marginally negative, a shock of -60bp is applied. For other currencies the shock is -100bp. Additional scenarios are performed to take into account basis risk and non-parallel shifts.

b) Economic Value analysis

This includes the calculation of duration measures, value sensitivities of the balance sheet for different points on the curve, as well as the impact on the Economic Value from larger shocks, e.g. a 200bp parallel shift and other parallel and non-parallel shocks, including the one required by the EBA guidelines (EBA/GL/2018/02).

In these analyses **behavioral assumptions** are included in order to cover **optional risk**, such as: **maturity profile for sight items** taking into account the stability of the volumes and the partial reaction of the customers to movements in market interest rates respect to the possibility to withdraw the volume of the current account – in the case of UCB the behavioral model refers to sight accounts in RON replicated for liquidity and interest rate risk. The assumptions are based on statistical techniques and analyses of historical observations of customer behavior.

IRRBB management is performed within Markets Risk and Finance departments.

UCB adopted Fair Value Hedge (FVH) and Cash Flow Hedge (CFH) procedures for the hedge of the interest rate risk run in its banking book.

Under FVH a micro hedge is intended and the exposure to interest rate risk to be hedged could be generated by loans and deposits with banks or customers and bonds classified as available for sale with a residual maturity above 1 year as of the hedge inception date and bearing fixed interest rates. FVH macro is intended to hedge the interest rate risk out of a pool of sight accounts.

The hedged interest rate risk could also be generated by transactions with floating rate (linked to money market interest rate) and variable rates, as well as transactions with fixed interest rates and residual maturity less than 1 year expected to be rolled over with the same rate conditions. In this case, UCB performs macro-cash flow hedge.

Interest rate risk measurement includes the following indicators:

A) RAF KPIs – measured on a monthly basis

A.1) Net Interest Income sensitivity

The outcome of the stress scenarios is measured as a percentage versus the Net Interest Income budget. The negative outcome is considered as the RAF KPI.

A.2) Economic Value sensitivity

The worst outcome of the Supervisory Outlier Tests - which in the case of UCB Romania is the “parallel up” scenario - is measured against Tier 1 Own funds.

The evolution of the IRRBB RAF KPIs during Q4/2021 at standalone and consolidated level, as well as the economic value sensitivity are presented in the tables below:

RAF	2021						
Interest Rate Risk in the Banking Book KPIs	RO Consolidated	Target	Trigger	Limit	31-Oct	30-Nov	31-Dec
	NII Sensitivity (% of budget)	>-9%	-0.09	-15%	-5.27%	-4.96%	-5.83%
	EV Sensitivity (% tier 1 cap)	>-12%	-12%	-15%	-5.15%	-5.40%	-6.34%
	UCB Standalone	Target	Trigger	Limit	31-Oct	30-Nov	31-Dec
	NII Sensitivity (% of budget)	>-9%	-0.09	-15%	-6.31%	-6.04%	-7.23%
	EV Sensitivity (% of tier 1 cap)	>-12%	-12%	-15%	-4.23%	-4.41%	-5.56%

Starting with 30-Jun-21 an "add-on" was considered for economic value sensitivity in order to stress the stable part of the non maturing deposits considered insensitive to interest rates and included in the behavioral model.

UCB	worst case scenario of SOT			Limit	Trigger
31-Oct-21	(35,196,870.58)	paralel up	1,036,648,003	-3.40%	-15.00%
30-Nov-21	(37,130,344.26)	paralel up	1,036,648,003	-3.58%	
31-Dec-21	(46,148,312.93)	paralel up	1,036,648,003	-4.45%	

with SOT add on for behavioral model

31-Oct-21	(43,833,742.66)	paralel up	1,036,648,003	-4.23%
30-Nov-21	(45,767,216.34)	paralel up	1,036,648,003	-4.41%
31-Dec-21	(57,620,241.37)	paralel up	1,036,648,003	-5.56%

RO	worst case scenario of SOT			Limit	Trigger
31-Oct-21	(48,431,974.26)	paralel up	1,108,881,160	-4.37%	-15.00%
30-Nov-21	(51,220,729.56)	paralel up	1,108,881,160	-4.62%	
31-Dec-21	(58,779,634.83)	paralel up	1,108,881,160	-5.30%	

with SOT add on for behavioral model

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31-Oct-21	(57,068,846.34)	parallel up	1,108,881,160	-5.15%
30-Nov-21	(59,857,601.64)	parallel up	1,108,881,160	-5.40%
31-Dec-21	(70,251,563.27)	parallel up	1,108,881,160	-6.34%

B) Granular indicators – measured on a daily basis

B.1) BP01 sensitivity for the Banking book positions per maturity buckets

This measures the changes in economic value due to a parallel shock of +/-1 bp of the interest rate term structure. The result is monitored daily by Financial Risk and reported to the Management and to the relevant Committees.

B.2) VaR for Banking Book and IRRBB

This indicator is monitored daily by Financial Risk and reported to the Management and to the relevant Committees.

As of 31.12.2021 the value of the granular indicators vs limits is as per tables below:

BP01 Banking Book:

BP01 Bank Book UCB	(EUR)	0-3M	3M-1Y	1Y-3Y	3Y-10Y	10Y+	SUM	
	Total ccys	15,404	1,960	75,391	58,178	2,954	31,622	
	Limit	30,000	35,000	150,000	170,000	40,000	220,000	
	Usage	51.35%	5.60%	50.26%	34.22%	7.39%	14.37%	
		SUM	no limit breach					
	EUR	138,886						
	Limit	300,000						
Usage	46.30%							

VaR for Banking Book and IRRBB:

(EUR mio)	Exposure	Limit	Usage	Exposure	Limit	Usage
	UCB			RO Group		
Bank Book	6.72	21.00	32.00%	6.84	21.00	32.56%
IRR	3.78	12.00	31.50%	4.22		

B. Price Risk

Price risk results from the activity of capital markets and associated derivative is zero because UniCredit Bank has no position on these markets / instruments.

C. Exchange Rate Risk

Foreign exchange risk arising from positions taken by departments / traders specializing owning specific limits for market risk. This risk arising from trading activities conducted through negotiation on various market instruments and is constantly monitored and measured.

Given the structure of the Banking Book and Trading Book, in the standard method for calculating RWA, the capital requirement for position risk (MKR SA TDI form) and for foreign exchange (MKR SA FX form) is calculated based on open currency positions at the end of each month.

The following risk limits are also monitored:

- FX net open position limits;
- BPV limits (Basis Point Value);
- CPV limits (Credit Point Value);
- VaR limits (Value at Risk);
- LWL limits (Loss Warning Level);
- Liquidity limits (Trigger points / Ratios);
- Limits for investments in government securities.

Currency Risk Stress testing includes:

a) Daily calculation of the impact of +/- 10% change of the fx rate

b) Monthly calculation of the impact of the following scenarios:

- depreciation EUR vs all other currencies with -15%
- appreciation EUR vs all other currencies with +15%
- depreciation EUR vs all other currencies with -10%
- appreciation EUR vs all other currencies with +10%
- depreciation RON vs EUR with -15%
- appreciation RON vs EUR with +15%
- depreciation RON vs EUR with -10%
- appreciation RON vs EUR with +10%
- depreciation USD vs EUR with -15%
- appreciation USD vs EUR with +15%
- depreciation USD vs EUR with -10%
- appreciation USD vs EUR with +10%

8.2 IRRBB

Definition of IRRBB for purpose of risk control and measurement

Interest rate risk in the banking book is defined as actual or future risk of negative impact on the Bank's earnings and capital, due to adverse movements in interest rates on its banking book.

Changing interest rates influence the level of earnings by changing interest income and expenses as well as other interest-sensitive income and operating expenses; they also impact the bank's underlying value by generating variations in the net present value of assets, liabilities and off balance sheet instruments.

The banking book regards the traditional commercial activity of the bank, which consists of lending and borrowing funds to and from customers. Per definition, banking book positions are the ones not held for trading purposes.

The IRRBB control and measurement system implemented by of the Bank addresses material sources of interest rate risk including repricing, yield curve, basis and option risk exposures, in compliance with bidding regulatory requirements.

Description of overall IRRBB management and mitigation strategies

The management of IRRBB aims to optimize, in an on-going scenario, the risk-return profile and long term value creation while reducing adverse impacts on bank's earnings and regulatory capital coming from interest rates volatility, in accordance with the strategy set by the Board in coherence with the UniCredit Group overall IRRBB strategy.

In order to take into account short and long term effects of interest rate volatility on future net interest income, the IRRBB management is performed within a set of limitations (limits, targets and triggers) defined in the risk appetite framework and in a set of granular restrictions approved by relevant bodies.

Limitations are defined in terms of earnings sensitivity and economic value sensitivity envisaging also thresholds per time buckets. The limits are linked to specific scenarios of interest rates movements such an increase or decrease of a particular magnitude (interest rate shocks), as well as to measures derived from underlying statistical distribution of interest rates (value at risk).

Specific measures that the bank uses to gauge its sensitivity to IRRBB

The main metrics used for IRRBB risk control and measurement are defined from both economic value and earnings perspective as follows:

- **Economic Value Perspective:**
 - Re-pricing Gap analysis
 - Economic Value Sensitivity: Basis Point Value (BP01) and time bucket sensitivity
 - Economic Value Sensitivity: EVE Supervisory standardized shocks
 - Basis Risk, captured in the Bank's Value at risk (VaR)
- **Net Interest Income perspective**
 - Net Interest Income (NII) sensitivity for parallel shocks (standard shocks)

Monitoring of EVE and NII in relation to established limits

The monitoring of the interest rate risk exposures is the responsibility of the risk taking functions (as 1st level control) and Risk function (as 2nd level control), which performs an independent and continuous monitoring of the risk indicators and metrics, a regular check of the limit compliance and an assessment of the effectiveness of market transactions executed by business functions. The Risk function is also responsible for updating Senior Management and/or relevant bodies (Management Board, Risk Management Committee, ALCO/FRCO) with regard to relevant interest rate risk exposure on a regular basis and compliance with the limits and warning levels set.

In case of a limit breach, a specific escalation process is defined, varying on the nature of the limit or warning level. The actions to taken by relevant function in the event of a breach also depend on the nature of the limit. As a general rule in the event of a limit breach, every effort is made in order to bring the exposure within the approved limit (by closing the positions that caused the breach or hedging them).

Stress tests for IRRBB – measured on a monthly basis

Several stress scenarios for IRRBB are run monthly on the Banking Book positions – according to Basel and to EBA requirements including supervisory outlier tests for UCB standalone and Romania Consolidated.

UCB - Standalone	Million EUR					
	31-Oct-21		30-Nov-21		31-Dec-21	
Own Funds Total / T1	1,213.62	1,026.37	1,203.58	1,016.33	1,208.73	1,021.01
Regulatory IR Stress Test (BB)	% Total OF		% Total OF		% total OF	
1 parallel shift + 200bps	9.45	0.78%	4.16	0.35%	-4.02	0.33%

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2 parallel shift - 200bps	2.72	0.22%	8.27	0.69%	14.71	1.22%
IRRBB Basel definition (BB)		% T1 OF		% T1 OF		% T1 OF
1 parallel shift + 200bps	9.45	0.92%	4.16	0.41%	-4.02	0.39%
2 parallel shift - 200bps	2.72	0.26%	8.27	0.81%	14.71	1.44%
3 Basel Parallel shock up	-14.30	1.39%	-18.99	1.87%	-30.21	2.96%
4 Basel Parallel shock sown	33.18	3.23%	38.43	3.78%	47.85	4.68%
5 Basel Steepening (sr down, lr up)	19.02	1.85%	17.21	1.69%	18.77	1.84%
6 Basle Flattening (sr up, le down)	-22.86	2.23%	-21.97	2.16%	-26.08	2.55%
7 Basel Short rates up	-29.24	2.85%	-29.64	2.92%	-37.20	3.64%
8 Basel Short rates down	38.18	3.72%	36.55	3.60%	43.91	4.30%
Maximum		3.72%		3.78%		4.68%
Supervisory Outlier Test		% T1 OF		% T1 OF		% T1 OF
1 parallel shift + 200bps	-11.45	1.12%	-13.95	1.37%	-19.96	1.95%
1 parallel shift - 200bps	0.19	0.02%	4.50	0.44%	5.37	0.53%
3 Basel Parallel shock up	-35.20	3.43%	-37.13	3.65%	-46.15	4.52%
4 Basel Parallel shock sown	15.53	1.51%	19.59	1.93%	21.92	2.15%
5 Basel Steepening (sr down, lr up)	9.18	0.89%	8.41	0.83%	9.01	0.88%
6 Basle Flattening (sr up, le down)	-25.14	2.45%	-24.87	2.45%	-28.21	2.76%
7 Basel Short rates up	-37.31	3.64%	-37.54	3.69%	-43.81	4.29%
8 Basel Short rates down	13.01	1.27%	14.72	1.45%	16.95	1.66%
Maximum		3.64%		3.69%		4.52%

RO Group Consolidated	Million EUR						
	Period	31-Oct-21		30-Nov-21		31-Dec-21	
Own Funds Total / T1		1,294.95	1,108.41	1,294.92	1,108.38	1,280.17	1,093.08
Regulatory IR Stress Test (BB)			% Total OF		% Total OF		% total OF
1 parallel shift + 200bps	1.10		0.08%	-6.53		0.50%	-12.45
2 parallel shift - 200bps	17.41		1.34%	25.65		1.98%	23.97
IRRBB Basel definition (BB)			% T1 OF			% T1 OF	
1 parallel shift + 200bps	1.10		0.10%	-6.53		0.59%	-12.45
2 parallel shift - 200bps	17.41		1.57%	25.65		2.31%	23.97
3 Basel Parallel shock up	-27.91		2.52%	-34.77		3.14%	-43.54
4 Basel Parallel shock sown	54.57		4.92%	62.27		5.62%	63.36
5 Basel Steepening (sr down, lr up)	17.17		1.55%	17.42		1.57%	18.37
6 Basle Flattening (sr up, le down)	-23.29		2.10%	-24.98		2.25%	-28.57
7 Basel Short rates up	-35.14		3.17%	-38.54		3.48%	-44.68
8 Basel Short rates down	47.11		4.25%	48.29		4.36%	51.97
Maximum			4.92%			5.62%	
Supervisory Outlier Test			% T1 OF			% T1 OF	
1 parallel shift + 200bps	-19.42		1.75%	-22.95		2.07%	-27.69
1 parallel shift - 200bps	5.65		0.51%	9.90		0.89%	9.64
3 Basel Parallel shock up	-48.43		4.37%	-51.22		4.62%	-58.78
4 Basel Parallel shock sown	24.32		2.19%	28.22		2.55%	29.32
5 Basel Steepening (sr down, lr up)	8.59		0.78%	8.11		0.73%	8.70
6 Basle Flattening (sr up, le down)	-26.32		2.37%	-27.41		2.47%	-30.37
7 Basel Short rates up	-43.73		3.95%	-45.43		4.10%	-50.77
8 Basel Short rates down	17.56		1.58%	19.51		1.76%	20.82
Maximum			4.37%			4.62%	
							5.38%

Conduct of stress testing, outcomes analysis

A regular stress testing assessment is performed in order to measure the vulnerability to loss under stressful market conditions. Depending on the vulnerabilities identified in case of extreme market conditions, measures to improve interest rate risk management, to review current limits, to reduce risk and/or conserve capital are implemented. Stress scenarios include:

- abrupt changes in the general level of interest rates;
- parallel interest rate shock;
- economic environment, and their possible development;

- specific scenarios that relate to the individual business model and profile of the institution.

Description of how the Bank covers its interest risk in the banking book as well as the associated accounting treatment

In accordance with prevailing accounting standards, the Bank values its banking book items at “amortised” (or “historical”) cost and at “fair” (or “market”) value. In order to achieve the financial stability of the balance sheet despite the effects of interest rate changes on both earnings and economic value, consistently with the risk appetite parameters and approved IRRBB strategy, the Bank uses derivatives that allow to optimize the risk/return profile that arises from mismatches in terms of tenor and interest rate characteristics of assets and liabilities. Consequently, hedging the banking book interest rate risk encompasses two aspects:

- Minimization of the variability in banking book’s present value due to changes in market interest rate curves
- Minimization of the variability in interest cash flows sensitive to changes in market interest rates that could negatively impact future profit and loss.

In order to ensure a consistency between the accounting perspective and business consideration, especially when interest rate derivatives are used for managing banking book interest rate risk, the Bank adopted Fair Value Hedge (FVH) and Cash Flow Hedge (CFH) accounting procedures for the hedge of the interest rate risk run in its banking book.

Economic capital

Scenarios with different probabilities and severities as formalized in internal procedures. The economic capital for Market Risk is computed based on the Group developed IMOD Model, which is based on the Value at Risk (VaR) methodology.

Liquidity Risk

Scenarios developed by the Group as well as internal developed scenarios which consider several degrees of liquidity crisis, as formalized in internal procedures.

8.3 RWA calculation method and models

For calculating the RWA for market risk, the Bank applies the Standardized Approach, according to Regulation no. 575/ 2013 of European Parliament and Council dated 26.06.2013 regarding prudential requirements for credit institutions and investment companies.

During 2021 the following components were relevant – trading debt instruments (interest rate general risk) and foreign exchange risk.

EU MR1 – Market risk under the standardized approach

		RWAs	Capital requirements
	Outright products		
1	Interest rate risk (general and specific)	85,725,956	6,858,076
2	Equity risk (general and specific)	-	-
3	Foreign exchange risk	-	-
4	Commodity risk	-	-
	Options		
5	Simplified approach	-	-
6	Delta-plus method	-	-
7	Scenario approach	-	-
8	Securitization (specific risk)	-	-
9	Total	85,725,956	6,858,076

8.4 Risk Management organization

Generally, a bank's market risks are due to price fluctuations or other market risk factors affecting the value of positions on its own books, both trading book and banking book, i.e. those arising from transactions and strategic investment decisions.

UniCredit Bank produces detailed reports on business trends and related risks on a daily basis, forwarding market risk documentation to local management, local authorities and relevant structures in the Group.

The relevant structures at Group level lay down strategic guidelines for taking on market risks by calculating, depending on risk appetite and objectives of value creation in proportion to risks assumed, capital allocation for the Parent company and its subsidiaries.

The responsible structures at Group level propose limits and investment policies for the Group and its entities in harmony with the capital allocation process when the annual budget is drawn up. Group Asset and Liability Management unit, in coordination with other regional liquidity centers, manages strategic and operational activities, with the objective of ensuring a balanced asset position and the operating and financial sustainability of the Group's growth policies on the loans market, optimizing the exchange rate risk, interest rate risk and liquidity risk.

Market Risk Management activity is performed according to legal regulations in force in Romania, norms and regulations issued by the National Bank of Romania (NBR) and internal regulations of UniCredit Bank, while the application of these regulations is harmonized with the Group Rules of UniCredit.

Role and practice of ALCO/FRCO

ALCO/FRCO acts as **operative body for monitoring, discussing and deciding on interest rate risk relevant topics and activities** within the Bank, having the following responsibilities:

- Approves, as first instance, the IRRBB strategy and overall interest rate risk framework of the Bank and regularly reviews them
- Approves the interest rate risk restrictions at local level, set in coherence with the UniCredit Group overall ones;
- Analyzes the evolution net interest income
- Analyzes the sensitivity of the balance sheet to changes in interest rates
- Receives information regarding risk indicators and evidence of conformity with the interest rate risk restrictions
- Defines corrective actions for balancing UCB interest rate risk position in accordance with the IRRBB strategy and system of restrictions in place

9. OPERATIONAL RISK

9.1 Framework for organizing risk management

The management of operational risk within UniCredit Bank is conducted in line with the internal regulation framework, Group policies and instructions and in compliance with the legal provisions in force.

Operational Risk is considered a significant risk and it is integrated into the Bank's policy and strategy regarding significant risks.

The **Operational risk** is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. This definition includes legal risk, but excludes strategic and reputational risk.

The main roles and responsibilities in managing and controlling operational risk are assigned to the Supervisory Board, the Management Board, the Superior Management (Directors and Heads of Departments), Banks' committees with responsibilities regarding operational risk, Operational and Reputational Risk function.

The framework for operational risk management in UniCredit Bank is well structured and involves relevant factors in promoting a culture favorable to the communication, management and control of operational risk. The framework is supported by the existence of a dedicated independent function for the control of operational risk, by a structure of relevant committees and by a system of reporting operational risk to the Management of the Bank.

The Bank has implemented a formal system for the assessment and management of operational risk with clearly defined roles and responsibilities.

The operational risk management system is integrated into the internal processes defined for the management of significant risks, in line with the internal procedures and regulations regarding the management of significant risks.

The main tools employed in the management and control of operational risk within UniCredit Bank are: collection of operational risk events, risk indicators monitoring, scenario analysis, Permanent Workgroup analyses, mitigation actions definition (independently or as part of the previously mentioned tools), validation of operational risk management system, operational risks and control self-assessment, operational risk 2nd level controls of outsourcing arrangements, management and Group reporting.

Collection of operational risk events is one of the main sources for the identification and measurement of operational risks. The process of collecting operational risk events /losses is established through well-defined rules for collection, validation and reconciliation of loss data against accounting bookings and other sources of information, in order to ensure completeness, accuracy and timeliness of reported data. The reporting responsibilities in respect of operational risk are included in the operational risk framework and as well in the procedures specific to each area of activity.

The completeness and accuracy of the operational risk database is ensured by the defined data quality processes, periodical reconciliations against multiple sources of information, analyses carried out in respect of accounts and bookings – processes described within operational risk specific regulations.

Scenario analysis is a core element of the operational risk assessment and control framework implemented both at local and Group level, as the scenario analysis is aimed at providing a forward looking assessment of the Bank's risk profile for improving the understanding and management of the risk profile by: assessing the impact on the business of hypothetical, yet foreseeable, extreme operational loss events; assessing how bad things could get across a range of stressed conditions; identifying the best responses to serious threats; identifying areas where controls are missing or could be enhanced.

Scenarios are also used as one of the primary inputs to estimate the Bank's overall risk profile and, whether it has adequate amounts of capital to cushion the impact of unexpected operational loss events. The

metrics/indicators derived from scenarios are used as input into the model, supporting the assessment of the Group risk profile on an aggregate basis.

In 2021, scenario analysis was performed according to the internal regulations, Group instructions and legal provisions in force.

Operational risk indicators are quantitative metrics reflecting operational risk exposure of specific processes or products and are in correlation with the changes in the risk environment. The monitoring of the operational risk indicators plays the role of an early warning system for changes in the operational risk exposure.

During 2021 the operational risk indicators system and the monitoring thresholds were revised in order to: identify and set up new indicators relevant for operational risk reporting, align existing thresholds with changing risk levels and remove the indicators which are no longer relevant in terms of operational risk.

At the Bank's level there are implemented **periodical reports** regarding the exposure and evolution of the operational risk, with a focus on: financial losses (including provisions) detailed on event types/model risk categories and business lines, ELOR indicator thresholds, capital requirement for operational risk, cross credit events, mitigation actions regarding operational risk discussed in the Permanent Work Group Committees, Operational Risk Indicators, thresholds breaches and actions taken, scenario analysis.

The reporting system includes quarterly reports to the Risk Management Operative Committee set up at the level of Management Board and at least bi-annually reports to the Supervisory Board. The operational risk reports have a consistent structure and present an overall picture of the exposure to operational risk. Apart of the regular reporting, ad hoc information regarding operational risk is submitted to the Bank's management and relevant structures at the Group level.

The **capital requirement for operational risk** is determined using the Advance Measurement Approach (AMA) model adopted in 2014. The AMA model has higher model granularity & risk sensitivity, increased underlying data and stronger focus on forward-looking risk analyses.

The calculation model was applied to the perimeter composed by the Legal Entities within UniCredit Group authorized to adopt the Advanced Measurement Approach, including UniCredit Bank.

As risk transfer mechanisms, UniCredit Bank uses a Banker's Blanket Bond policy (part of UniCredit Group BBB Policy) that covers, according with terms and conditions specified in the policy, Financial Organization Crime, Computer Manipulation, Professional Indemnity. The BBB Policy is complying with the international requirements regarding the use of policies as risk transfer mechanism in order to reduce the capital requirement for operational risk calculated according with AMA.

In addition, UniCredit Group (UniCredit Bank Romania included) concluded a cyber insurance policy which provides coverage for cyber risks including damages to digital assets, business interruption impacts, cyber extortion and other types of damages caused by insured risks, liabilities and defense expenses related to security and confidentiality breaches, reputational expenses as a result of cyber risk incidents.

The calculation of economic capital for operational risk is also based on the AMA model.

9.2 Stress testing disclosures

The stress testing exercise in UniCredit Bank Romania consists of calculating the stressed loss / conditional operational risk loss, centrally – at Group level, based on the advanced model for operational risk. The Group Operational and Reputational Risk Function is responsible for the assessment and review of the stress test methodology and approach.

9.3 RWA calculation method and models

The capital calculation within UniCredit Bank Romania is performed according to the AMA model and the figures are as follows:

Operational Risk-RWA 2021 (EUR) – UniCredit Bank Consolidated Level	Capital Requirement for Operational Risk (EUR)	
	2021	2020
579,690,640	46,375,251	43,456,578

Operational Risk-RWA 2021 (EUR) – UniCredit Bank Individual Level	Capital Requirement for Operational Risk (EUR)	
	2021	2020
431,323,507	34,505,881	31,098,573

9.4 Other risks - Risk types and risk management

Fraud risk management is a prime responsibility for all employees stemming from the necessity of protecting UniCredit Bank and its assets / activities from being target to fraudulent activities. The internal framework is aimed at creating an appropriate level of awareness to all employees and partners and to ensure an efficient system of controls to prevent this risk in all aspects included in the circuit of fraud: prevention, detection, investigation and settlement of high risk events, recovery of fraud related losses and the implementation of the necessary corrections.

The fraud risk management represents a top priority for UniCredit Bank and its coordination is ensured by the Antifraud and Fraud Prevention Department and Permanent Working Group on Fraud Risk. An ongoing four steps program covering methodology, training, activities review from a fraud risk perspective and monitoring was implemented to mitigate the likelihood and impact of this risk.

One of the main topics for the Operational Risk strategy is **cybercrime risk** with an enhanced focus on the area of online banking fraud with the related topics phishing/hacking/malware etc. and how the bank can decrease risks in current and upcoming online banking processes.

The **legal risk management** within UniCredit Bank Romania is ensured by all employees with the appropriate assistance and support of the Legal function. The aim of the legal framework is to ensure the adequacy of legal and corporate fulfilments, the examination of the evolution of laws and their consistent interpretation, as well as the identification, assessment and monitoring of the overall legal risks.

The responsibility for the proper management of the **risks associated with outsourcing** or outsourced activities rests with the RTO (Division/Department coordinating the outsourced activity). The final responsibility for the proper management of the risks associated with outsourcing and outsourced activities rests with, the Supervisory Board and the Management Board based on their assigned responsibilities, and also with the outsourced activities coordinators, according with the delegation of the functional responsibilities within the Bank. Regular information to ensure the proper monitoring and evaluation of the outsourced activities is carried out by the RTO / Division / Department coordinating the outsourced activity.

The management of the risks associated with the outsourced activities covers all the outsourcing stages (new initiatives and modifications of existing ones, supplier selection, contract terms and conditions, monitoring of existing outsourced activities, unexpected situations and continuity plans, relation with authorities).

Business continuity management represents a critical factor for UniCredit Bank and it takes a central role in the overall company strategy/goals. The constantly changing potential of threats requires a systematic, flexible, integrated and business oriented treatment of business continuity management in UniCredit Bank.

The management of the business continuity risk is an ongoing process being the responsibility of management at all levels and of each employee. It is carried out in line with the local UniCredit Bank policies and procedures compliant with Group policies, local legal framework and internationally accepted best practices and standards (ISO 22301).

Information and communication technology (ICT) and security risk is subcategory of operational risk relating to the risk of loss due to breach of confidentiality, loss of systems and data integrity, inadequacy or unavailability of systems and data or inability to change information technology (IT) in a reasonable period of time and at reasonable costs, when environmental or business requirements change (agility). This includes security risks arising either from inadequate internal processes or which did not perform their function properly, or from external events, including cyber-attacks or inadequate physical security.

Conduct risk is the current or prospective risk of losses to a credit institution arising from inappropriate supply of financial services including cases of willful or negligent misconduct.

Model risk is a potential loss an institution may incur, as a consequence of decisions that could be principally based on the output of internal models, due to errors in the development, implementation or use of such models.

9.5 Other risks - Publicly known risk events

During 2021, the situation in which the Competition Council sanctioned with fines the Association of Romanian Financial Companies and 16 member companies, including Unicredit Leasing Corporation IFN SA, for violating the legislation in the field of competition, was a public event with a negative impact on UniCredit Bank Romania's reputation, in terms of the negative media coverage generated (12.37% of the total articles published in January 2021). Also in May, an international issue in which the European Commission ruled that seven investment banks were guilty of violating the antitrust laws during the 2008 global financial crisis, fining Nomura, UBS and UniCredit generated a high number of negative articles (almost 11% negative articles out of the total references in May 2021).

10. REPUTATIONAL RISK

Reputational risk is the current or prospective risk of adverse outcome on profits, own funds or liquidity arising from damage to the credit institution's reputation.

Reputational risk can be triggered by negative publicity, true or not, related to:

- Bank's reputation, respectively, the Bank's top management or their members
- The practices, tools, Bank liquidity or solvency
or
- Other risks arising in the Bank's activity, such as:
 - Operational risk (fraud, inadequate internal processes, failures of IT systems, security incidents, human errors etc.);
 - Market risk;
 - Credit risk;
 - Liquidity risk;
 - Legal / Regulatory topics: reputational risk can derive from breaches of law/regulations disclosed to stakeholders (e.g. breaches of laws or regulations which become public being mentioned in media);
 - ICT & Business Continuity: reputational risk can derive from a discontinuity of services provided by the Bank which may have impacts (loss, problem, etc.) on the customers' / counterparties side, the escalation and information process is performed according to the specific regulations in place.

Reputational risk triggered by business relationships with clients / partners or transactions connected with reputational risk sensitive sectors.

Impact of reputational risk can affect the ability of the Bank to operate in accordance with the business plan, to establish new business relationships or continue existing partnerships with customers.

Managing reputational risk

The system of values of UniCredit Bank is based on integrity, ethics and respect as the mechanism for conversion of profits into sustainable value; this implies clarity and transparency of the messages on relevant issues to employees, clients, financial community, regulators, nongovernmental organizations and general public. Thus, communication is a key factor in management of the reputational risk.

The Bank's strategy, internal processes, important structural changes require special attention because of complex legal requirements, monitoring carried out by rating institutions and regulatory bodies and mass media interest.

Since each process/part of the banking activity may influence the organization's reputation, the reputational risk management process will take into account:

- Each process/operations banking segment;
- Relationships with clients, especially in sensitive areas (confidentiality of information, compliance with concluded contracts, clients' right to be informed, crisis management situations, the negative publicity, etc.);
- Relationship with shareholders, other counterparties, investors, employees or regulatory authorities ("stakeholders");

- General performance of the relevant representatives for the bank's image (top managers / high level management).

In crisis situations, cases with impact in reputational risk occurrence, it is envisaged:

- Establishing communication strategy (defining transmitted and promoted key messages; defining channels for messages transmission);
- Sending messages through timely and brief press releases, updated – if case, when new elements/news appear (success of communication is assured by an adequate flow of information from the Management Board and the concerned business units towards the representatives of the Identity and Communication Department)
- Informing, whenever deemed necessary in crisis situations, by the competent departments in line with the specific internal regulations, of the call center staff members and from other structures with communication related responsibilities, regarding response models / structures which need to be submitted / provided in the respective situations. This information and response models are established and submitted in line with the provisions of the specific internal crisis regulations.
- Regularly updating web site or intranet of the Bank to ensure an adequate information flow.

Qualitative assessment of reputational risk is considered for example in case of business activities related to sensitive sectors (e.g. nuclear energy, weapon/defence industry, mining, water infrastructure - dams, coal-sector, etc.), for new product process, outsourcing or ICT risk assessment, according to specific regulations in force.

The Reputational Risk Framework is completed by Reputational Risk Group Special Policies implemented locally, being elements of the UniCredit Group's reputational risk management framework. These policies aim to provide rules and principles for reputational risk assessment and management, and the working flow to apply to business relationships with counterparties involved in sensitive industries like: the Nuclear Energy Industry, Defense/Weapons industry, Water Infrastructure industry, Mining and Coal Sector.

11. EXCESSIVE LEVERAGE RISK

Description of Excessive Leverage Risk

Risk of excessive leverage represents the risk resulting from the Bank's vulnerability due to leverage or contingent leverage that may require unintended corrective measures to its business plan, including distressed selling of assets which might result in losses or in valuation adjustments to its remaining assets.

The monitoring of risk of excessive leverage is realized based on specific instructions received from the Group and by taking into account the legal provisions in force.

Thus, the Leverage Ratio indicator, calculated according to instructions received from Group is included in the Risk Appetite Framework of the Bank. A system of limits comprising a Target level, a Trigger and a Limit is applied. Monitoring is done on a quarterly basis.

LrSum: Comparison between carrying amounts of assets and exposures for Leverage Effect calculation

The template LRSum presents the reconciliation between the total exposure considered for the computation of the Leverage report and the carrying amounts of the assets.

Summary comparison of accounting assets vs leverage ratio exposure measure		Q4 2021	Q4 2020
1	Total assets as per published financial statements	55,912,868,594	51,968,540,000
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	-	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-
7	Adjustment for eligible cash pooling transactions	5,603,917	-
8	Adjustment for derivative financial instruments	200,237,966	66,021,215
9	Adjustment for securities financing transactions (SFTs)	-	-
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	6,269,396,812	4,970,809,682
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12	Other adjustments	-228,240,121	-144,862,257
13	Total exposure measure	62,159,867,169	56,860,508,640

LRCOM: Leverage Ratio Common Disclosure

The template presents Leverage Ratio as at 31 December 2021 and the split of the main exposures according with CRR Art. 429 and 451.

CRR leverage ratio exposures		2021 Q4	2020 Q4
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	50,001,939,018	46,051,431,617
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-

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CRR leverage ratio exposures		2021 Q4	2020 Q4
6	(Asset amounts deducted in determining Tier 1 capital)	-232,412,406	-193,534,493
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	49,769,526,612	45,905,808,874
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	49,772,982	76,532,830
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	200,237,966	66,021,215
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	250,010,948	142,554,045
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	5,870,932,797	5,841,336,039
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	-	-
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures	5,870,932,797	5,841,336,039
19	Off-balance sheet exposures at gross notional amount	20,386,059,931	17,141,573,153
20	(Adjustments for conversion to credit equivalent amounts)	-13,918,152,076	-13,050,852,400
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)	-198,511,042	-184,857,479
22	Off-balance sheet exposures	6,269,396,812	4,970,809,682
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
23	Tier 1 capital	5,604,184,008	5,611,256,834
24	Total exposure measure	62,159,867,169	56,860,508,640
25	Leverage ratio (%)	9.02%	9.87%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	0.00%	0.00%

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CRR Leverage ratio exposures		2021 Q4	2020 Q4
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	0.00%	0.00%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	0.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27 a	Overall leverage ratio requirement (%)	0.00%	0.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Fully phased in	Fully phased in
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	5,721,775,246	-
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	5,870,932,797	-
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	-	-
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	-	-
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	-	-
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	-	-

Basel III stipulates the computation, the reporting and the disclosure of the Leverage Ratio and presents a requirement based on risks.

CRR Art. 429 defines the Leverage Ratio as the result of dividing the capital measurement indicator into the institution's total exposure measurement indicator. The indicator is expressed as a percentage between Tier 1 Own Funds and the total exposure calculated as the sum of the exposure value of all the assets and off-balance sheet items that have not been deducted from the Tier 1 Own Funds calculation.

LRSpl: Split-up of on balance sheet exposures (excluding derivatives and SFTs)

	Items	CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs), of which:	50,001,939,018
EU-2	Trading book exposures	179,241,741
EU-3	Banking book exposures, of which:	49,822,697,277
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	12,767,752,750
EU-6	Exposures to regional governments, MDB, international organizations and PSE not treated as sovereigns	436,141,451
EU-7	Institutions	1,501,005,205
EU-8	Secured by mortgages of immovable properties	7,706,818,927
EU-9	Retail exposures	6,404,653,174
EU-10	Corporate	17,335,571,477
EU-11	Exposures in default	580,747,301
EU-12	Other exposures (e.g. equity, securitizations, and other non-credit obligation assets)	3,090,006,994

12. LIQUIDITY RISK

12.1 Liquidity

Liquidity risk is defined as the risk that the Bank may not be able to fulfill its expected or unexpected financial obligations, without affecting its daily operations or its financial condition.

Among the main potential sources of liquidity risk, UniCredit Bank distinguishes between:

- Liquidity Mismatch Risk/Refinancing Risk: the risk of a mismatch between either the amounts and/or the timing of cash inflows and outflows;
- Liquidity Contingency Risk: the risk that future events may require a materially larger amount of liquidity than the bank currently requires. This might be due to the loss of liabilities, requirements to fund new assets, difficulty in selling liquid assets or difficulty obtaining needed new liabilities in the case of a liquidity crisis.
- Market liquidity risk: the risk that the institution cannot easily unwind or offset specific exposures, such as investments held as liquidity reserves, without incurring a loss because of inadequate market depth or market disruptions;

The Bank has defined and implemented a bank-wide **Risk Strategy** which is approved by the Management Board and Supervisory Board. The Risk Strategy defines, inter alia, the risk appetite for liquidity and funding risk as part of the Bank's Risk Appetite Framework ("RAF").

In line with the Bank's RAF, key strategic principles are defined to ensure that processes are in place to manage the liquidity and funding risk exposure.

The Bank has also defined and implemented a dedicated **Liquidity and Funding Strategy** that is centered on the following strategic principles and goals set in coherence with the defined risk appetite:

Strategic Principles:

- Liquidity and funding management is based on clear and strict risk management principles set according to the Risk Appetite Framework (RAF).
- The definition of the desired liquidity profile is fully integrated within the Risk Appetite Framework, in order to drive the evolution of the lending activity consistently with the desired funding profile.
- The self-sufficiency funding strategy is based on a well-diversified funding base due to its commercial banking model, with priority given on the growth of local funding sources out of customer business with a variety of products (sight, savings, term deposits), as well as capital market transactions (e.g. medium- and long-term placements of own issues).
- The strict principle of self-sufficient funding ensures that the proceeds are used primarily for business development, enabling UCB and the Group to calculate funding costs according to own risk profile.
- All strategic goals must be in compliance with UniCredit Group Strategy and Regulatory requirements.

Strategic Goals:

- Optimization of the liquidity profile in line with liquidity limits in place and local regulatory framework, maximizing cost savings without sacrificing funding diversification;
- Self-sufficiency target fulfillment by achieving a sound commercial funding base and creating a foundation for full compliance with the relevant Risk Appetite Framework metrics;
- Achievement of main KPIs for each year in accordance with the Risk Appetite Framework, designed as quantitative targets defined in the yearly Funding Plan for, among others, the Liquidity Coverage Ratio and the Funding Gap;

- Achievement of the necessary resilience towards stress scenario through building sufficient stock of the Counterbalancing Capacity;
- Exploring the advantage of cheaper sources like Covered Bond or Supranational Funding and evaluating the relevant maturities of medium/long term issuances;
- Keeping the funding dependency on short term wholesale external funding to a reasonable level necessary for reciprocity;
- Efficient management of the trading/investment book financing (mitigating the use of intragroup funding) in compliance with intragroup rules for bond investments, as well as market risk and credit risk limits.

The main objective of the Funding Strategy is defined with the purpose of covering possible structural funding needs, whilst ensuring compliance on going concern and according to a forward looking perspective with limits and triggers of liquidity and balance sheet metrics, both regulatory and internal as defined in the Bank's liquidity risk framework/ Risk Appetite framework.

12.2 Internal Liquidity Adequacy Assessment Process (ILAAP) framework

The Bank has implemented an Internal Liquidity Adequacy Assessment Process in accordance with regulatory requirements and guidelines as set out by the European Banking Authority, National Bank of Romania and Basel Committee on Banking Supervision ("BCBS")

Liquidity management is performed by UniCredit Bank in accordance with local binding laws and regulations and UniCredit Group Liquidity Management Framework. Clear and strict risk management principles are set according to the Bank's Risk Appetite Framework.

The main goal of Unicredit Bank's overall liquidity management is to keep the liquidity exposure at such a level that the Bank is able to honor its payment obligations on an on-going basis, but also during a crisis without jeopardizing its franchise value or its brand's name.

Governance

A clear separation of duties and responsibilities is implemented in UniCredit Bank for an efficient and effective management of liquidity risk. Accordingly, the Bank keeps two governance layers:

- Managing Bodies acting as strategic decision-taking functions (as the Board of Directors, Supervisory Board, Assets and Liabilities Committee)
- Operational units acting as operative liquidity management functions, each being assigned different roles and responsibilities: Finance/ALM, Markets, Financial Risk.

In particular, Finance/ ALM provides strategic planning, management and supervision of the Bank's overall liquidity position, whilst Markets ensures operational short-term liquidity management (up to 1 year). Financial Risk has the responsibilities of independent controls and reporting of liquidity risk.

The governance framework also covers the responsibilities of other units (e.g. model validation and internal audit function – the third line of defense) ensuring independent review of the liquidity and funding risk management framework.

Liquidity management framework

The Bank has established a comprehensive liquidity management framework covering the main ILAAP components such as:

- Liquidity Risk Management Policy – outlines the general principles and the liquidity management internal set-up and provides a detailed description of the liquidity management process under going-concern and contingency scenarios;

- Regulation regarding liquidity risk metrics and limits – provides details regarding the computation methodology and the internal limits of the liquidity and funding risk indicators;
- Regulation regarding the funding plan and contingency funding plan – describes the principles established for the set-up of the funding plan and contingency funding plan (CFP) in the context of the financial planning process, internal approval requirements and communication between involved units;
- Liquidity policy in crisis situations, alternative funding plans – provides a detailed description of the CFP governance, activation mechanism, liquidity management procedures and actions are detailed in the liquidity policy in crisis situations, alternative funding plans;
- Funds transfer pricing policy (FTP) – covers aspects related to FTP governance, mechanism, components and principles are covered within the following internal regulations;
- Working instructions regarding the set-up of regulatory reports (e.g. LCR, NSFR, ALMM) and managerial reporting process – internal workflow established with regards to the preparation and submission of regulatory reports to the NBR.

Risk Assessment

Liquidity risk is assessed as part of the annual risk materiality assessment process carried out within the Bank.

Liquidity risk, for its particular nature, is addressed by means of gap analyses, liquidity stress testing, and complementary measures (mainly through a set of indicators: e.g. loan to deposit ratio, liquidity coverage ratio). These tools allow the measurement of liquidity risk over different time horizons and by currencies.

Liquidity management process

UniCredit Bank's liquidity management process encompasses short-term liquidity risk management (operational liquidity, up to 1Y) and structural liquidity risk management (liquidity position over 1y).

- **Intraday liquidity management,**

The focus of intraday liquidity management is on actively managing the Bank's intraday liquidity obligations by timely meeting payments and keeping a sustainable intraday liquidity buffer.

- **Short-term liquidity risk management (operational liquidity):**

Short term liquidity management and reporting focuses on the Bank's liquidity profile from 1 day up to one year.

The aim of short-term liquidity management is to maintain a sustainable equilibrium between cash inflows and cash outflows for the purpose of ensuring the normal operational continuity of the UniCredit bank's commercial business. The main activities for attaining such purpose are:

- managing the access to the payment systems and of the cash payments (operational liquidity management)
- monitoring the level of the liquidity reserves and the extent of their utilization over time, with the objective of maintaining the liquidity reserves at appropriate levels in order to meet potential outflows.

As indicator of the short term liquidity risk, apart from the Liquidity Coverage Ratio, UniCredit Bank adopted the Operative Maturity Ladder (OML) by currency, whose main components are the net contractual cash flows (in/outflows) affecting the cash position of Bank, thus impacting directly the "core liquidity" of the bank over pre-defined time buckets, and the Counterbalancing capacity.

- **Medium and long-term liquidity risk management (structural risk):**

Structural liquidity management (over 1 year) aims at ensuring the financial stability of the balance sheet, with the objective of avoiding excessive and unexpected pressures on the funding requirements over the short

term, whilst optimizing the funding sources and related costs. This is achieved through the maintenance of an adequate balance between the medium- long term and sticky assets and the respective stable sources of funding.

The main metric used to measure medium-long term liquidity risk is the Net Stable Funding Ratio, along with managerial structural liquidity ratios/gaps

Liquidity Stress Testing

Stress testing is a risk management technique used to evaluate the potential effects on an institution's financial condition of a specific event and/or movement in a set of variables.

UniCredit Bank performs regular liquidity stress tests in order to diagnose the Bank's liquidity risk. The 3 main type of scenarios of potential liquidity crisis employed are:

- Idiosyncratic stress scenario - defined as a factual or market-hypothesized problem specific to the Bank, expected to cause a substantial reduction in counterparty limits by rating-sensitive costumers and inter-bank markets and possible withdrawal of Sight and Saving Deposits
- Market-wide stress scenario - defined as a generally negative development in the market's environment (e.g. broad sector, market or economic events) causing an increased stretch on available liquidity
- Combined stress scenario - highlights the interconnections that stem from the happening of both economic turmoil and Bank's specific issues

In particular, the results of the stress tests are useful for:

- assessing the adequacy of liquidity limits
- assessing the right size of the counterbalancing capacity/liquidity buffer to withstand a given scenario within a defined timeframe
- providing support to the development of the contingency plan.

Monitoring and Reporting

UniCredit Bank measures and manages liquidity based on a monitoring system that envisages different types of restrictions – managerial and regulatory – embedded in risk metrics limits or warning/trigger levels. In case of a limit breach or warning level activation, Financial Risk investigates the rationale of the events, triggering the proper escalation and reporting them to the relevant committees.

Regulatory reports refer to LCR (Liquidity Coverage Ratio), NSFR (Net Stable Funding Ratio) and ALMM (Additional Liquidity Monitoring Metrics). In addition, the Bank regularly prepares the reports required by the NBR (e.g. Quick liquidity ratio, Asset Encumbrance).

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The table below shows the detailed picture of the LCR as of 31 of December 2021:

Amounts in RON Million	Individual			Consolidated		
	Value	Coeff.	Adjusted value	Value	Coeff.	Adjusted value
C72						
Liquid Assets - HQLA						
Total	010	18,081	18,074	18,081		18,074
Level 1 assets	020	18,035	18,035	18,035		18,035
Cash	040	1,960	1,960	1,960	1.00	1,960
Withdrawable central bank reserves	050	1,188	1,188	1,188	1.00	1,188
Central government assets	070	14,887	14,887	14,887	1.00	14,887
Level 2 assets	220	46	39	46		39
Regional government / local authorities or Public Sector Entity assets	240	46	39	46	0.85	39
C73						
Outflows						
Total	010	60,123	14,522	60,564		14,410
Outflows from unsecured transactions / Deposits	020	60,123	14,522	60,564		14,410
Retail deposits	030	17,588	1,484	17,588		1,484
Higher outflows	050	5,455	750	5,455		750
category 1	060	4,098	512	4,098	0.13	512
category 2	070	1,357	238	1,357	0.18	238
stable deposits	080	9,585	479	9,585	0.05	479
other retail deposits	110	2,548	255	2,548	0.10	255
Operational deposits	120	996	239	996		239
Non-operational deposits	210	21,175	9,594	21,006		9,424
deposits by financial customers	230	2,031	2,031	1,862	1.00	1,862
deposits by other customers	240	19,144	7,563	19,144		7,563
covered by DGS	250	475	95	475	0.20	95
not covered by DGS	260	18,669	7,468	18,669	0.40	7,468
Additional outflows	270	1,927	1,927	1,927		1,927
outflows from derivatives	340	1,927	1,927	1,927	1.00	1,927
Committed facilities	460	3,320	311	3,815		361
credit facilities	470	3,320	311	3,815		361
to retail customers	480	1,067	53	1,067	0.05	53
to non-financial customers other than retail customers	490	2,216	222	2,711	0.10	271
to credit institutions	500	-	-	-		-
to regulated institutions other than credit institutions	540	-	-	-	0.40	-
Other products and services	720	14,726	647	14,841		655
Uncommitted funding facilities	731	1,152	115	1,201	0.10	120
undrawn loans and advances to wholesale counterparties	740	-	-	-	0.12	-
mortgages that have been agreed but not yet drawn down	750	-	-	-	0.00	-
credit cards	760	38	0	38	0.01	0
overdrafts	770	6,457	291	6,522	0.05	293
trade finance off-balance sheet related products	860	4,819	241	4,821	0.05	241
others	870	2,260	-	2,260	0.00	-
Other liabilities	885	391	319	391	0.00	319
liabilities resulting from operating expenses	890	72	-	72	0.00	-
in the form of debt securities if not treated as retail deposits	900	6	6	6	1.00	6
others	918	313	313	313	1.00	313
Outflows From Secured Lending And Capital Market-Driven Transactions	920	-	-	-	0.00	-
Counterparty is central bank	930	-	-	-	0.00	-
Counterparty is non-central bank	1020	-	-	-		-
C74						
Inflows						

Amounts in RON Million		Individual			Consolidated		
		Value	Coeff.	Adjusted value	Value	Coeff.	Adjusted value
Total	010	5,954.16		2,798	6,094		2,868
Inflows from unsecured transactions/deposits	020	3,348.23		2,798	3,488		2,868
monies due from non-financial customers	030	567.72		295	707		365
monies due from financial customers	100	428.30		428	429		429
monies due from assets with an undefined contractual end date	201	347.04	0.20	69	347	0.20	69
inflows from derivatives	240	1,918.35	1.00	1,918	1,918	1.00	1,918
other inflows	260	86.82	1.00	87	87	1.00	87
Inflows from secured lending and capital market-driven transactions	263	2,605.93		-	2,606		-
collateral that qualifies as a liquid asset	309	2,605.93	0.00	-	2,606	0.00	-
collateral that does not qualify as a liquid asset	317	-	0.00	-	-	0.00	-
Liquidity Coverage Ratio				154.17%			156.60%

The high-quality liquid assets reserve consists of coins and banknotes, withdrawable reserves held at the National Bank and securities issued by the Romanian government and local public authorities. In addition, the high-quality assets also include securities received as collateral in reverse repo transactions.

Liquidity outflows are influenced mostly by the evolution of non-operational deposits of corporate and sovereign customers, which is also the main source of funding for the bank.

Liquidity inflows are composed mainly of maturing deposits held at financial institutions and of instalments from clients' loans.

In 2021, the significant currencies for LCR reporting were RON and EUR. From a currency mismatch point of view, during last year there were some significant amounts in EUR reverse repo transactions, while the main funding sources are made up of deposits denominated mostly in the national currency from the retail and corporate customers, as well as deposits and credit facilities in EUR received from group entities (significantly decreased comparing to 2020) and supranational institutions. The mentioned reverse repo transactions had short maturities, under 30 days, and were collateralised by high quality level 1 government bonds.

The following table presents, on a consolidated level, the LCR average in RON equiv. for the year 2021. The number of observations for determining the average is 12, with figures coming from monthly reports from December 2021 and the previous months.

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LIQ1: Liquidity Coverage Ratio (LCR – consolidated)

EU 1a	Quarter ending on	Total unweighted value (average)				Total weighted value (average)			
		31.12.2021	30.09.2021	30.06.2021	31.03.2021	31.12.2021	30.09.2021	30.06.2021	31.03.2021
EU 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)					17,269,972,745	17,202,930,273	17,149,319,865	17,150,604,397
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	15,953,987,501	15,817,832,880	15,408,314,246	14,918,205,426	1,365,927,071	1,356,105,354	1,331,034,088	1,300,311,396
3	Stable deposits	7,477,354,432	7,301,726,114	7,537,364,218	7,772,975,907	432,084,255	428,154,217	407,977,412	388,648,795
4	Less stable deposits	6,184,581,700	6,033,051,117	6,428,793,211	6,806,918,638	938,055,873	932,515,282	923,056,676	911,662,601
5	Unsecured wholesale funding	16,754,358,484	16,302,979,788	17,149,305,769	18,368,926,485	8,998,609,403	8,929,097,095	8,587,694,312	8,377,145,790
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	946,073,854	941,918,401	722,432,872	554,926,069	164,399,420	158,163,471	139,014,398	129,095,238
7	Non-operational deposits (all counterparties)	15,808,284,630	15,361,061,387	16,426,872,898	17,800,785,999	8,834,209,983	8,770,933,624	8,448,679,914	8,234,836,136
8	Unsecured debt	-	-	-	13,214,417	-	-	-	13,214,417
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	7,580,629,881	7,775,079,322	6,523,596,071	5,295,637,305	3,200,504,431	3,280,641,026	3,331,570,988	3,415,335,528
11	Outflows related to derivative exposures and other collateral requirements	5,899,339,243	6,230,327,099	4,724,421,605	3,246,573,206	2,989,206,862	3,077,683,687	3,150,340,616	3,246,573,206
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	2,472,687,374	2,402,098,687	2,184,544,050	2,049,064,098	211,297,569	202,957,339	181,230,371	168,762,322
14	Other contractual funding obligations	656,968,698	679,623,010	634,068,059	594,756,135	597,238,590	620,898,738	575,923,628	537,109,439
15	Other contingent funding obligations	14,468,450,766	14,446,980,234	14,480,113,643	14,194,750,208	640,125,813	639,558,729	614,506,625	583,693,972
16	TOTAL CASH OUTFLOWS					14,685,463,993	14,699,106,329	14,440,729,641	14,213,596,125
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	5,047,491,854	5,250,955,010	5,268,817,978	5,755,055,194	-	-	-	-
18	Inflows from fully performing exposures	1,862,218,745	1,934,401,745	1,901,271,387	1,934,728,847	1,119,856,339	1,152,873,946	1,141,467,031	1,143,967,812
19	Other cash inflows	3,197,284,035	3,267,707,136	3,305,726,544	3,363,971,570	3,122,388,796	3,209,706,443	3,269,962,274	3,335,466,908
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19b	(Excess inflows from a related specialized credit institution)								
20	TOTAL CASH INFLOWS	10,106,994,634	10,453,063,891	10,475,815,909	11,053,755,611	4,242,245,135	4,362,580,389	4,411,429,304	4,479,434,720
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	10,106,994,634	10,453,063,891	10,475,815,909	11,053,755,611	4,242,245,135	4,362,580,389	4,411,429,304	4,479,434,720

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EU 1a	Quarter ending on	Total unweighted value (average)				Total weighted value (average)			
		31.12.2021	30.09.2021	30.06.2021	31.03.2021	31.12.2021	30.09.2021	30.06.2021	31.03.2021
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					17,269,972,745	17,202,930,273	17,149,319,865	17,150,604,397
22	TOTAL NET CASH OUTFLOWS					10,564,842,328	10,468,284,699	10,029,300,337	9,734,161,406
23	LIQUIDITY COVERAGE RATIO					163.47%	164.33%	170.99%	176.19%

The evolution of the LCR indicator in 2021 at consolidated level is presented in the table below:

Liquidity Coverage Ratio UCB - consolidated (equivalent. RON)					
Date	Liquid assets	Outflows	Inflows	Net outflows	Ratio
31-Jan-21	17,251,521,075	15,123,820,873	4,854,446,020	10,269,374,853	167.99%
28-Feb-21	17,344,296,325	13,828,515,338	3,684,626,034	10,143,889,304	170.98%
31-Mar-21	17,657,298,585	16,323,959,169	5,232,899,109	11,091,060,060	159.20%
30-Apr-21	16,854,457,170	14,030,035,732	3,220,916,528	10,809,119,204	155.93%
31-May-21	16,126,861,412	14,154,239,884	3,910,273,604	10,243,966,280	157.43%
30-Jun-21	16,333,685,785	15,499,519,033	4,939,723,528	10,559,795,504	154.68%
31-Jul-21	17,179,639,565	14,210,243,542	3,710,773,248	10,499,470,294	163.62%
31-Aug-21	17,016,310,315	15,735,344,988	4,631,704,666	11,103,640,322	153.25%
30-Sep-21	17,405,364,131	15,589,353,744	4,314,303,161	11,275,050,583	154.37%
31-Oct-21	17,091,997,735	15,383,454,298	4,902,124,226	10,481,330,072	163.07%
30-Nov-21	17,493,631,051	16,209,487,254	4,955,861,190	11,253,626,064	155.45%
31-Dec-21	18,074,489,768	14,409,841,847	2,868,129,552	11,541,712,295	156.60%

In 2021, the LCR level was compliant with the regulatory requirements of a minimum of 100%, as well as exceeding the internally targeted level by the Bank which is above the regulated level.

Furthermore, UniCredit Bank has access to the calculation tool of the indicator on a daily basis and analyses and reports LCR main drivers to management and Group on a weekly basis.

Regarding the evolution of liquid assets, there was a greater volatility of the reserves held at the National Bank compared to the previous year, during the Minimum Requirement Reserve maintenance period. The bank recorded an increase in the portfolio of government issued securities with a very high liquidity quality level, and a slight increase in coins and banknotes, especially towards the end of the year.

UniCredit Bank aimed to improve the liquidity coverage ratio by increasing the residual maturity of funding resources and through obtaining funding with low outflow rates. For achieving this goal, campaigns were launched to attract retail deposits with maturity over 6 months.

The next table presents the NSFR summary as of December 2021:

Data	Total ASF	Total RSF	Ratio	Exchange Rate
31-Mar-19	33,154,282,046	21,820,310,924	151.94%	4.7628
30-Jun-19	34,253,891,727	22,124,678,921	154.82%	4.7351
30-Sep-19	33,088,074,603	22,398,209,660	147.73%	4.7511
31-Dec-19	36,093,851,569	22,630,827,937	159.49%	4.7793
31-Mar-20	36,129,829,067	22,485,120,639	160.68%	4.8254
30-Jun-20	35,658,673,433	20,576,147,125	173.30%	4.8423
30-Sep-20	36,255,277,123	21,151,131,613	171.41%	4.8698
30-Dec-20	37,248,331,575	21,202,491,856	175.68%	4.8694
31-Mar-21	36,370,162,982	21,988,845,371	165.40%	4.9251
30-Jun-21	36,664,152,339	22,076,223,520	166.08%	4.9267
30-Sep-21	37,655,218,179	23,600,574,613	159.55%	4.9471
31-Dec-21	39,571,899,021	24,829,395,127	159.38%	4.9481

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LIQ2: Net stable funding ratio (NSFR)

RON equivalent	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:					
2 <i>Regulatory capital</i>	-	-	-	6,533,247,619	6,533,247,619
3 <i>Other capital instruments</i>	-	-	-	6,533,247,619	6,533,247,619
4 Retail deposits and deposits from small business customers:	-	-	-	-	-
5 <i>Stable deposits</i>	-	15,409,157,533	-	2,361,378,662	16,670,283,838
6 <i>Less stable deposits</i>	-	8,813,267,936	-	772,258,053	9,144,862,592
7 Wholesale funding:	-	6,595,889,597	-	1,589,120,608	7,525,421,246
8 <i>Operational deposits</i>	-	22,943,032,202	698,679,375	3,409,965,066	14,079,920,983
9 <i>Other wholesale funding</i>	-	995,870,137	-	-	69,894,744
10 Liabilities with matching interdependent assets	-	22,803,242,714	698,679,375	3,409,965,066	2,657,031,622
11 Other liabilities:	-	426,636,380	1,761,254,030	1,407,819,566	2,288,446,581
12 <i>NSFR derivative liabilities</i>	-	93,160,247	-	-	-
13 <i>All other liabilities and equity not included in the above categories</i>	-	333,476,134	1,761,254,030	1,407,819,566	2,288,446,581
14 Total ASF	-	-	-	-	39,571,899,021
15 Total NSFR high-quality liquid assets (HQLA)					
16 Assets encumbered for a residual maturity of one year or more in a cover pool	-	-	-	-	599,858,639
17 Deposits held at other financial institutions for operational purposes	-	6,398,113,617	611,898,746	544,039,183	902,657,816
18 Performing loans and securities:	-	7,283,636,821	5,994,493,340	18,599,249,779	20,814,233,394
19 <i>Performing loans to financial institutions secured by Level 1 HQLA</i>	-	-	-	-	-
20 <i>Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions</i>	-	-	-	-	-
21 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and PSEs, of which:</i>	-	-	-	-	-
22 <i>With a risk weight of less than or equal to 35% under the Basel II standardized approach for credit risk</i>	-	-	-	-	-
23 <i>Performing residential mortgages, of which:</i>	-	-	-	-	-
24 <i>With a risk weight of less than or equal to 35% under the Basel II standardized approach for credit risk</i>	-	-	-	-	-
25 <i>Securities that are not in default and do not qualify as HQLA, including exchange-traded equities</i>	-	-	-	-	-
26 Assets with matching interdependent liabilities	-	-	-	-	-
27 Other assets:	-	-	-	1,619,262,734	1,619,262,734
28 <i>Physical traded commodities, including gold</i>	-	-	-	-	-
29 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>	-	-	-	-	-
30 <i>NSFR derivative assets</i>	-	93,160,247	-	-	4,658,012
31 <i>NSFR derivative liabilities before deduction of variation margin posted</i>	-	-	-	-	-
32 <i>All other assets not included in the above categories</i>	-	-	-	-	-
33 Off-balance sheet items	-	701,061,300	314,902,778	7,828,286,597	888,724,532
34 Total RSF	-	-	-	-	24,829,395,127
35 Net Stable Funding Ratio (%)	-	-	-	-	159.38%

During 2021 UniCredit Bank maintained an adequate level of the NSFR, with an average for the last trimester of 162.60%, stable funding covering the duration of long-term assets.

The items requiring stable funding consisted of investments in securities, loans and credit lines, while stable funding was provided by items such as capital instruments, retail and corporate deposits, intragroup financing and facilities from supranational entities.

Risk Mitigation

The main liquidity mitigation factors for UniCredit Bank are:

- planning and monitoring of the short-term and medium to long-term liquidity needs;
- an effective Contingency Liquidity Policy (CLP), including a Contingency Action Plan to be executed in case of market crisis;
- a liquidity buffer to face unexpected outflows;
- liquidity stress testing performed on a regular basis;
- a system of early warning indicators to anticipate increased risk or vulnerabilities in the liquidity position or potential funding needs.

Funding Plan

The Funding Plan has a fundamental role in overall liquidity management, influencing both the short term and long term liquidity position. It includes the set of the medium long term instruments (with relevant amount, maturity, timing, cost) to be realized in order to cover the expected funding deriving from the planned evolution of the liquidity uses and, avoiding pressure on the short term and ensuring compliance with regulatory and managerial limits.

The Funding Plan is updated at least on a yearly basis and is aligned with the Financial Planning (Budgeting) process and the Risk Appetite Framework.

Funds transfer pricing (FTP)

The liquidity cost benefit allocation is an important component of the liquidity management framework of the Bank.

As regards the liquidity risk components, the FTP system is implemented based on the following principles:

- the allocation of a specific price for each product considering the funding needs / contributions;
- the pricing of liquidity components based on the short-term or medium-long-term funding curve, taking into account the market principle;
- the correct allocation of costs/ benefits in order to avoid excessive risk-taking behaviors by business units / legal entities and to avoid different pricing procedures for equivalent liquidity exposures;
- alignment with the regulatory, legal and fiscal requirements related to this topic.

Contingency Liquidity Management

Contingency Liquidity Management has the objective of ensuring the availability of an effective organizational model in order to manage effectively the negative effects of a liquidity crisis situation, which is achieved through:

- setup of an extraordinary liquidity crisis governance model, linked to a set of early warning indicators, that can be activated in case of a crisis
- pre-definition of a set of available standby mitigating liquidity actions in order to be able to proceed timely
- consistent internal and external communication crisis.

A relevant part of the contingency liquidity management is the **Contingency Funding Plan**, which describes potential, but concrete actions the Bank can take in order to obtain additional funding in contingency situations and is complementary to the yearly Funding Plan. The measures foreseen are described in terms of a menu of actions together with sizes, instruments, and timing of execution aimed at improving the Bank's liquidity position during times of name or systemic crisis.

The Bank's resilience in crisis situations is regularly tested as part of the liquidity stress testing process.

Early warning indicators

In order to identify emerging vulnerabilities in its liquidity risk position or potential funding needs, UniCredit Bank employs a set of early warning indicators linked to macroeconomic or market indicators and specific internal metrics. A specific activation mechanism is adopted in order to have sufficient time to inform senior management of a deteriorating situation and allow putting in place adequate actions aimed at restoring the business-as-usual state.

Concentration of funding and liquidity sources

In 2021 the customer deposits were on 90.49% of the total debt (on standalone level). Of the total resources from non-banking customers, 39.49% were deposits from retail customers, 53.12% from corporate customers, the difference being deposits from PB customers and other financial customers excluding banks. With regards to counterparties, the main fund providers of the bank are other entities from UniCredit Group, sovereign and non-financial corporate customers and supranational.

Regulatory reporting on Internal liquidity adequacy assessment process (ILAAP)

The regulatory reporting on ILAAP conducted for 2021 was performed according to the requirements set out by NBR Regulation no.11/2020 (Annex 10 – ICAAP/ILAAP Reader's Manual).

12.3 Asset Encumbrance

In accordance with the EU Regulation no.575/2013 as stipulated in the article 433 with subsequent amendments and connected regulatory requirements and UE Regulation 637/2021, the Romanian UniCredit Group's encumbered and unencumbered assets, at consolidated level, for the year 2021 are disclosed using the EBA templates as stipulated in the above mentioned regulation. Fair value of encumbered assets as at 31.12.2021 was RON 633,753,852, of which debts securities RON 539,055,333 and other financial assets RON 94,698,519.

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Template A-Assets

The amounts in the templates below are median values on quarterly basis for the year 2021.

Total Assets of the credit institution, split by type of assets stood at RON billion 52.99 as at 31 December 2021 (31 December 2020: RON billion 51.97).

In the bellow template HQLA represents high-quality liquid assets and EHQLA extremely high-quality liquid assets.

RON equivalents Median Values (2021, quarterly basis)		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	Assets of the reporting institution	633,753,852	-			52,364,322,043	-		
030	Equity instruments	-	-			32,657,183	-		
040	Debt securities	539,055,333	539,055,333	541,226,279	541,226,279	9,603,294,063	9,603,294,063	9,493,791,904	9,493,791,904
050	of which: covered bonds	-	-	-	-	-	-	-	-
060	of which: asset-backed securities	-	-	-	-	-	-	-	-
070	of which: issued by general governments	539,055,333	539,055,333	541,226,279	541,226,279	9,603,294,063	9,603,294,063	9,493,791,904	9,493,791,904
080	of which: issued by financial corporations	-	-	-	-	-	-	-	-
090	of which: issued by non-financial corporations	-	-	-	-	-	-	-	-
120	Other assets	94,698,519	-			42,844,307,293	-		

Template B – Guarantees received

During the year 2021, collateral received by UniCredit Bank at consolidated level amounted to RON 86,253,194,092 RON and were not available for encumbrance.

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received or own debt securities issued other than covered bonds and ABSs encumbered
Carrying amount of selected liabilities	-	86,253,194,092

Template C - Encumbered assets/collateral received and associated liabilities

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received or own debt securities issued other than covered bonds and ABSs encumbered
Carrying amount of selected liabilities (Median value, 2021, quarterly basis)	-	633,753,852

Template D – Narrative information

During 2021, the encumbered assets of the Romanian UniCredit Group were approximately 1.20% of the total assets.

The Romanian UniCredit Group encumbered assets' portfolio and the sources of encumbrance includes:

- Government bonds placed as collateral in the clearing systems;
- Government bonds used by the Bank and its subsidiary UniCredit Leasing as guarantees for financing from the European Investment Bank;
- Government bonds used as collateral for repo transactions with Central Bank.

During 2021, the value of the encumbered assets (computed as median values on quarterly basis) was in amount of RON 633,753,852, compared to RON 660,943,707 during 2020.

The Bank's liabilities from the financing contract with the European Investment Bank should be covered at any time with eligible assets in the clearing system managed by Clear stream.

12.4 Liquidity Buffer and Funding strategy

Liquidity Buffer

In order to avoid that short-term liquidity crunch or other unexpected events might lead to potentially serious consequences, the Bank constantly maintains a liquidity reserve. This is a cushion represented by an ample amount of cash and other highly liquid assets to be promptly converted in cash (either through sale or collateralized funding) in case of ordinary or unexpected needs of liquidity, in accordance with regulatory and internal liquidity rules.

Stress testing (regulatory or internal stress scenarios) ensures that there is adequate liquidity both during normal economic cycles, as well as periods of sustained stress and that appropriate excess liquidity buffer is in place.

The major category in the Bank's liquidity buffer is represented by high quality bonds issued by the Government of Romania, eligible at Central Bank.

Liquidity and Funding strategy

UniCredit Bank reviews annually its liquidity and funding strategy by considering the desired business model, the actual and expected macroeconomic/financial conditions and the funding capacity of the Bank, as well as the overall risk tolerance as reflected by the Risk Appetite Framework. The strategy is implemented in all

management stages of liquidity and financing, from financial planning and monitoring to implementation and execution of the process.

The strategic principle of “self-sufficiency” governs the liquidity and funding strategy of the Bank, which targets to achieve a well-diversified funding base, with priority given on the growth of local funding sources out of customer business with a variety of products (sight, savings, term deposits), as well as medium- and long-term placements of own issues.

In accordance with this principle, the main strategic goals the liquidity and funding strategy encompasses are:

- optimization of the liquidity profile in line with liquidity limits in place and local regulatory framework;
- self-sufficiency target fulfillment by achieving a sound commercial funding base and creating a foundation for full compliance with the relevant Risk Appetite Framework metrics;
- achievement of main KPIs for each year in accordance with the Risk Appetite Framework, designed as quantitative targets defined in the yearly Funding Plan for, among others, the Liquidity Coverage Ratio and the Core Banking Book Funding Gap;
- achievement of the necessary resilience towards stress scenario through building sufficient stock of the Counter Balancing Capacity, as targeted in the yearly Funding Plan;
- exploring the advantage of cheaper sources like Covered Bond or Supranational Funding and evaluating the relevant maturities of medium/long term issuances;
- keeping the funding dependency on short term wholesale external funding to a reasonable level necessary for reciprocity.

The main tool through which the Bank implements its liquidity and funding strategy is the Funding Plan. Finance (ALM) is responsible for the execution of the Funding Plan, accessing the markets for medium and long term funding, in order to increase Bank’s self-sufficiency, exploit market opportunities and optimize the cost of funds.

13. EQUITY EXPOSURES

13.1 Description of the equity participations and description of the method of accounting booking

UniCredit Bank Group has no equity positions in the trading book as of 31 December 2021.

The Group's strategy is focused on investments in companies which represent a long term development potential and with which mutual beneficial partnerships can be concluded, whereby the synergies of the partners can create value added for their shareholders.

The table below presents the equity exposures of the Group, including the accounting classification and the prudential treatment applied.

Participation*	Accounting Method	Business activity	Prudential approach	Participation (%)	Amount (RON thousands)
UniCredit Leasing Corporation IFN SA	Investments in subsidiaries	Financial Leasing	IRB	99.96%	78,349
UniCredit Consumer Financing IFN SA	Investments in subsidiaries	Financial services	IRB	50.10%	64,767
UniCredit Leasing Fleet Management	Financial assets at fair value through other comprehensive income	Operational Leasing	Standard	9.99%	2,346
Transfond SA	Financial assets at fair value through other comprehensive income	Financial services	IRB	8.04%	4,355
Biroul de Credit SA	Financial assets at fair value through other comprehensive income	Financial services	IRB	6.80%	1,191
Fondul Roman de Garantare a Creditelor pentru Intreprinzatorii Privati IFN SA	Financial assets at fair value through other comprehensive income	Financial services	IRB	3.10%	537
Visa Inc	Financial assets at fair value through other profit and loss	Financial services	IRB	n/a	46,760
Total equity exposures					198,305

*UCIB became a subsidiary of the Bank beginning with 31 December 2021 (please see more details in Chapter 3.1. Relevant scope of consolidation). The Bank has an indirect controlling interest of 99.98% through UCLC which owns 100% UCIB. Thus, UCIB is not presented per se as a participation in the consolidated financial statements.

14. OTHER RISKS

14.1 Real Estate Risk

Real Estate Investment Risk is defined as the potential losses resulting from market value fluctuations of the Bank's own real estate portfolios. This includes the portfolio of UCB, of the property ownership companies and its special purpose companies and shareholding companies. The real estate risk does consider the real estate property for loan collaterals.

The strategy for the management of real estate risk is performed by applying the following basic principles:

- The management of real estate risk is performed through indicators and specific risk models like: total real estate vs total assets, detailed figures within specific reports;
- Specific events will be considered within the stress scenarios.

14.2 Business Risk

Business Risk is defined as representing the adverse, unexpected changes in business volume and/or margins. It can lead to serious losses in earnings, thereby diminishing the market value of a company.

Business risk can result above all from: serious deterioration of the market environment, changes in the competitive situation or customer behavior, as well as changes in the expense structure.

The Bank has implemented internal regulations and specific mechanisms in order to manage the Business Risk, and the capital requirements for this risk are included in the economic capital of the Bank.

14.3 Strategic Risk

The strategic risk is analyzed from the following perspectives:

- Risk of business changes;
- Risk of vicious implementation of the decisions;
- Risk of lack of reactivity;
- Regulatory risk.

The Bank implemented internal regulations and specific mechanisms in order to manage Strategic Risk.

15. REMUNERATION POLICY

15.1 Description of Remuneration Policy

The Bank's remuneration policies are represented by the Human Resources Policy, Compensation Policy and the Rules on Remuneration – Compensation and Benefits.

The Bank's remuneration policies are approved by the Supervisory Board, upon the recommendation of the Remuneration Committee and are accessible to all employees. The Remuneration Committee has a consultative role and is responsible for preparing the decisions on remuneration topics that need to be taken by the management body.

The Remuneration Committee of the Bank was set up by the Supervisory Board and is composed of 3 members chosen from amongst the members of the Supervisory Board. The Chairman of the Remuneration Committee is appointed by the Supervisory Board.

In 2021, the Remuneration Committee had the following composition:

Nr. Crt.	Remuneration Committee	Position	2021 evolution
1	PASQUALE GIAMBOI	President	01.01.2021 – 21.12.2021
	HÜSEYİN FAİK AÇIKALIN	Member	
	LUBOSLAVA URAM	Member	

In the 2021, the Remuneration Committee was convened in five (5) ordinary and extraordinary sessions.

In accordance with the provisions of NBR Regulation no. 5/ 2013, the remuneration practices for the members of the management body and identified staff are presented in a separate policy – i.e. Policy regarding the structure, composition, assessment of suitability and remuneration of management body and assessment of suitability for key function holders.

UniCredit ensures the alignment between remuneration and risk profile through policies that support risk management, through rigorous governance processes based on informed decisions taken by corporate bodies and by defining compensation plans that include the strategic risk appetite defined by the Risk Appetite Framework, the time horizon and the individual behaviors.

UniCredit uses a compensation mix formed of fixed and variable remuneration.

The performance assessment process is subject to separate regulation setting out the steps of this process, the evaluation criteria and provides for a standardized framework for ongoing assessments.

According to the Rules on Remuneration – Compensation and Benefits, the performance bonus is approved by the Management Board considering the following criteria:

- The financial performance of UniCredit Group;
- The overall outcome of the whole group activity and of the bank considered;
- The performance of the group / department the employee belongs to;
- The sustainable individual performance of the employee;

Variable remuneration can be adjusted and even reduced to zero (*malus* clause) if the Group and Bank benchmark performance criteria are not met. Performance remuneration takes into account both individual and collective performance, setting both individual and collective goals.

General rules for goal setting:

- Part of the goals should contribute to the sustainability of results;
- Business performance criteria is risk adjusted;
- Individual criteria for performance assessment include competency assessment, respecting the values of the Group and the goals set;
- There is at least one indicator pertaining to Risk;
- There is a balance between financial and non-financial goals.

Economic goals must be avoided for Company Control Functions – Internal Audit, Risk Management and Compliance – and individual goals set for employees in these functions shall reflect primarily the performance of their own function and be independent of results of monitored areas.

At individual level, evaluation criteria include qualitative and quantitative elements. Among the qualitative ones, there are included qualifications obtained by employee, compliance with systems and regulatory framework represented by the Bank's internal procedures, involvement in actions or significant projects and contribution to team's performance.

In addition to the above criteria, there are also used prudential criteria for risk adjustment, such as cost of capital and the income obtained after provisioning.

Remuneration package of persons with key management functions includes both fixed and variable elements, in order to achieve a balance and a motivation and retention tool:

- Fixed remuneration component compensates the role of the person and reflects the experience and skills needed for the respective position, as well as the demonstrated excellence level and overall contribution to the objectives of the organization.
- Variable remuneration component is designed to reward results and is correlated with both short-term goals and the long-term goals. Performance measurements consider both the overall performance of the Group and of the Bank, of the Business Area / Competence Line in which the person operates, as well as the individual sustainable results.

In accordance with NBR Regulation 5/ 2013 the variable remuneration offered to an employee will not be higher than 100% of the fixed total remuneration of each employee.

Remuneration policy and structure of compensation packages for persons with executive responsibilities are subject to annual approval of the Supervisory Board, based on the consultative opinion issued by the Remuneration Committee.

Supervisory Board ensures that remuneration policies are compliant to the culture, goals and long-term strategy of the bank and to its control environment, through the following actions:

- Approves remuneration policies;
- Approves, after consultation with the Remuneration Committee constituted for this purpose, the remuneration practice for the Board members;
- Approves the remuneration practices for the coordinators of the risk functions, for the directors of Internal Audit and Compliance departments.

For the Management Board members, the performance measurement used to calculate the variable remuneration component includes an adjustment for all current and potential risk types and also considers the cost of capital and required liquidity.

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For Management Board members, at least 50% of variable remuneration consists in non-cash instruments and at least 40% of variable remuneration is deferred for a period of at least 4-5 years.

Exception to the above rules: staff whose annual variable remuneration does not exceed EUR 30,000 or does not represent more than 1/3 of the total annual remuneration of the respective staff member's.

The Bank applies a performance adjustment practice, which enables the adjustment of the part (up to 100%) from an employee's bonus (Claw back clause) if:

- there is reasonable evidence that the employee participated in or was responsible for conduct which resulted in significant losses to the credit institution;
- there is reasonable evidence that the employee failed to meet appropriate standards of fitness and propriety;
- the Bank or the relevant operational unit suffers a material downturn in its financial performance; or
- the Bank or the relevant operational unit suffers a material failure of risk management.

The remuneration policies and practices of the Group are also implemented at level of the directly controlled entities.

The Bank did not have any employee who benefited from a total remuneration of at least 1 million euro / financial year.

The estimated data about variable remuneration for the management body and Identified Staff for 2021 are presented below. These estimates can be changed, the variable remuneration will be discussed on the Supervisory Board meeting on 26.04.2022. Variable remuneration for 2021 will be paid in april 2022.

Information about the remuneration for the Bank's identified staff and its consolidated subsidiaries' staff

Data will be available after the individual bonus allocation and could be provided in April 2022

	Members of the management body in its Supervisory function	Members of the management Board	Investment banking	Retail banking	Asset management	Support functions	Independent control functions	All others
Number of members of personnel	6	9	-	11	-	7	6	2
Number of Identified Staff, in full time equivalent	-	9	-	11	-	7	6	2
Total NET profit - RON	805,650,219							
Total Remuneration - RON	319,656	13,186,031	-	6,838,508	-	3,127,901	3,269,068	1,120,282
Of which Total Variable Remuneration - RON	-	5,266,145	-	1,022,632	-	629,886	386,799	165,510

Information related to remuneration of Identified Staff

RON equivalent	Senior management	Other material risk takers
Number of Identified Staff, in full time equivalent	15	26
Total fixed remuneration (lei), of which:	8,239,542	12,594,934
- cash	8,239,542	12,594,934
- shares and other share-linked instruments	-	-
- other type of instruments	-	-
Total variable remuneration (lei), of which:	5,266,145	2,204,827
- cash	2,519,641	1,843,543
- shares and other share-linked instruments	2,746,504	361,284
- other type of instruments	-	-
Total variable remuneration (lei) awarded in year N and postponed, of which:	3,745,232	505,797
- cash	998,729	144,513
- shares and other share-linked instruments	2,746,504	361,284
Total variable remuneration (lei) postponed, due and unpaid, awarding in previous years - art.450 (1) h) from EU Reg.no.575/2013, of which:	3,887,246	736,872
- cash	1,538,495	306,637
- shares and other share-linked instruments	2,348,750	430,235

Special payments	Guaranteed bonuses		Sign-on awards		Severance payments	
	Number of employees	Total amount	Number of employees	Total amount	Number of employees	Total amount
Senior management	-	-	-	-	-	-
Other material risk-takers	-	-	-	-	-	-

	Remuneration amount	Senior management	Other material risk-takers
1	Number of employees	15	26
2	Total fixed remuneration	8,239,542	12,594,934
3	Of which: cash-based	8,239,542	12,594,934
4	Of which: deferred	-	-
5	Of which: shares or other share-linked instruments	-	-
6	Of which: deferred	-	-
7	Of which: other forms	-	-
8	Of which: deferred	-	-
9	Number of employees	12	26
10	Total variable remuneration	5,266,145	2,204,827
11	Of which: cash-based	2,519,641	1,843,543
12	Of which: deferred	998,729	144,513
13	Of which: shares or other share-linked instruments	2,746,504	361,284
14	Of which: deferred	2,746,504	361,284
15	Of which: other forms	-	-
16	Of which: deferred	-	-
17	Total remuneration	13,505,687	14,799,761

Deferred and retained remuneration	Total amount of outstanding deferred remuneration	Of which:	Total amount of amendment during the year due to ex post explicit adjustments	Total amount of amendment during the year due to ex post implicit adjustments	Total amount of deferred remuneration paid out in the financial year
		Total amount of outstanding deferred and retained remuneration exposed to ex post explicit and/or implicit adjustment			
Senior management	3,887,246	3,887,246	-	-	2,825,443
Cash	1,538,495	1,538,495	-	-	924,283
Shares	2,348,750	2,348,750	-	-	1,901,160
Cash-linked instruments	-	-	-	-	-
Other	-	-	-	-	-
Other material risk-takers	736,872	736,872	-	-	730,454
Cash	306,637	306,637	-	-	208,702
Shares	430,235	430,235	-	-	521,752
Cash-linked instruments	-	-	-	-	-
Other	-	-	-	-	-
Total	4,624,118	4,624,118	-	-	3,555,897

See also Consolidated and Separate Financial Statements for December 2021 - Note 12 “PERSONNEL EXPENSES”

15.2 Description of the UniCredit Bank management composition in Romania

The management of the entities in the UniCredit Group is governed by a two-tier system, by the Management Board and, respectively, by the Supervisory Board, in accordance with the prerogatives provided by the Constitutive Deed and within the authority levels given by the General Assembly of Shareholders. The members of the Management Board exercise their responsibilities under the oversight of the Supervisory Board.

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The number of mandates held by the members of management structures of UniCredit Bank S.A. is detailed below.

Members of the Management Board on 31 December 2021:

- Catalin Rasvan Radu held 1 executive mandate (Executive President of UniCredit Bank S.A.) and 2 non-executive mandates within the UniCredit Group (counted as 1 mandate as per Emergency Ordinance no. 99/2006) and 3 mandates within non-profit organizations (countless according to GEO No. 99/2006);
- Philipp Gamauf held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.) and 1 non-executive mandate within the UniCredit Group (counted as 1 mandate under the Emergency Ordinance no. 99/2006) and 1 non-executive mandate outside UniCredit Group;
- Nicola Longo Dente held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.) and 1 non-executive mandate within the UniCredit Group (counted as 1 mandate under the Emergency Ordinance no. 99/2006);
- Andrei Bratu held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.) and 2 non-executive mandates within the UniCredit Group (counted as 1 mandate under the Emergency Ordinance no. 99/2006);
- Carlo Driussi held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.);
- Feza Tan held 1 executive mandate (First Executive Vice President of UniCredit Bank S.A.);

- Antoaneta Curteanu held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.) and 1 non-executive mandate within the UniCredit Group (counted as 1 mandate under the Emergency Ordinance no. 99/2006) ;
- Diana Ciubotariu held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.);
- Dragos Birlog held 1 executive mandate (Executive Vice President of UniCredit Bank S.A.);

Members of the Supervisory Board on 31 December 2021:

- Pasquale Giamboi held 3 non-executive mandates within the UniCredit Group one as President of the Supervisory Board of UniCredit Bank S.A, (counted as 1 mandate under Emergency Ordinance no. 99/2006);
- Luboslava Uram held 2 non-executive mandates, one as Vice-Chairman of the Supervisory Board of UniCredit Bank S.A., and 1 mandate within the UniCredit Group (counted as 1 mandate under Emergency Ordinance no. 99/2006);
- Faik Huseyin Acikalin held 2 non-executive mandates within the UniCredit Group (out of which one as member of the Supervisory Board of UniCredit Bank S.A. and member of Supervisory Board in UniCredit Russia counted as 1 mandate under Emergency Ordinance 99/2006), 2 non-executive mandates outside of UniCredit Group;
- Nazan Somer Ozelgyn Zeynep held 4 non-executive mandates, 2 non-executive within the UniCredit Group (one as a member of the Supervisory Board of UniCredit Bank S.A and one as Supervisory Board member in UniCredit Croatia, counted as 1 mandate under Emergency Ordinance no. 99/2006) and 2 non-executive mandates outside the UniCredit Group and 3 non- executive mandates within non-profit organizations (countless according to GEO No. 99/2006);
- Grazziana Mazzone held 1 non-executive mandate (member of the Supervisory Board of UniCredit Bank S.A.);
- Riccardo Roscini hel 1 non-executive mandate (member of the Supervisory Board of UniCredit Bank S.A.).

Policy regarding the selection and appointment of board members

The Nomination Committee (CN) is a permanent committee established by the Supervisory Board of UniCredit Bank. It is responsible, among others, to identify and recommend to the Supervisory/Management Board, for approval, candidates to occupy the vacant seats within the management body and to assess the balance of knowledge, skills, diversity and experience within the management body.

Once the Nomination Committee has identified a candidate for Supervisory/Management Board position, it assesses the respective candidate according to a "Fit & Proper" internal procedure (Rules for the selection and assessment of Management Board and Supervisory Board members and for assessing the suitability of key function holders) based on at least the following documents: Curriculum Vitae, information about job- specific expertise, personal reliability and good repute, extract from criminal records, and governance criteria: information about availability (time resources), information about relations to the credit institution and about relation with other entities.

A revaluation is done once a year for every member of the Management Body (Management Board and Supervisory Board).

At the end of 2021 the Nomination Committee had 3 members.

The Policy regarding Diversity in the Selection of People in the Management Structures

As of the year end of 2021, there were 6 women in the management of UniCredit Bank (3 of 9 members of Management and 3 out of 6 members of Supervisory Board).

The Group Policy on the structure, composition and remuneration of the Corporate Bodies of Group Companies states that, for the purpose of increasing the number of women on the Corporate Bodies of leading Group Companies and with the aim of reaching at least one third of the members of the Management Board (Supervisory Board and Management Board), the Parent Company has adopted the promotion of women to Corporate Bodies as best practice within the Group.

16. OTHER DISCLOSURE REQUIREMENTS

Disclosure requirements according to article 644 of National Bank of Romania Regulation no.5/2013 regarding prudential requirements for credit institutions.

Information related to name, nature of activities by geographical area, turnover, number of employees, profit of the year before taxation, profit tax, are available in Consolidated and Separate Financial Statements for year ended 2021, as follows:

- name, nature of activities by geographical area – Note 1 REPORTING ENTITY from Notes to the Consolidated and Separate Financial Statements for the year ended 31 December 2021;
- turnover – Note 4. RISK MANAGEMENT – item k) Turnover - from Notes to the in Consolidated and Separate Financial Statements for the year ended 31 December 2021;
- number of employees – Note 11 PERSONNEL EXPENSES from Notes to the in Consolidated and Separate Financial Statements for the year ended 31 December 2021;
- profit or loss before taxation – CONSOLIDATED AND SEPARATE STATEMENT OF COMPREHENSIVE INCOME;
- public subsidies received - the Bank did not receive subsidies during the financial year 2021.

Disclosure requirements according to article 645 of National Bank of Romania Regulation no.5/2013 regarding prudential requirements for credit institutions.

UniCredit Bank registered a good profitability with annualized ROA (return of assets) at 1.49%. Information on the key indicators is presented in Chapter 2 " 2021 Activity Overview" from the Management Board's consolidated and separate report for the financial period ended 31 December 2021.

Disclosure requirements according to article 67 of National Bank of Romania Regulation no.5/2013 regarding prudential requirements for credit institutions.

Bank's Committees are presented in the Management Board's consolidated and separate report for the financial period ended 31 December 2021 on chapter 8 CORPORATE GOVERNANCE.

Disclosure requirements according to article 16 of National Bank of Romania Regulation no.5/2013 regarding prudential requirements for credit institutions.

During 2021, the Supervisory Board's activity was carried out through 12 meetings, of which 6 were Ordinary and 6 were Extraordinary. The attendance of the Supervisory Board Members at the meetings is reflected in the table below:

Supervisory Board Member	Number of 2021 meetings during mandate	Number of 2021 meetings attended	Beginning of exercising responsibilities during 2021	Termination of mandate during 2021
Zeynep Nazan Somer Ozelgin	12	10	-	-
Pasquale Giamboi	12	12	-	-
Huseyin Faik Acikalin	12	10	-	-
Luboslava Uram	12	12	-	-
Riccardo Roscini	12	11	-	-
Niccolo Ubertalli	5	2	-	07.09.2021
Graziana Mazzone	12	12	-	-

During the 12 meetings, the supervisory members discussed, critically analyzed, took decisions and / or evaluated in periodic information on the following topics and related activities:

- quarterly presentation of the financial performance, including economic situation, financial market conditions, benchmarking analyses, commercial performance of the Bank, detailed by business segments and lines of activity at the level of the Group in Romania;
- report on Bank's performance in the business divisions: Retail and Corporate Investment Banking;
- Risk Management presentation, including detailed assessment of credit, market and operational risks, both at the individual level of the bank and at the consolidated level of the Romanian Group;
- continuous improvement of the internal control system; Internal Audit, Compliance and Risk Management matters, including findings, measures and recommendations from the regulatory and supervision authorities were discussed on regular basis in the Supervisory Board meetings, including also within the meetings of the Audit Committee, Risk Committee and Remuneration Committee;
- activity reports of the committees assisting the activity of the Supervisory Board;
- aspects related to outsourced activities, including externalization of new activities and regular reviews of outsourced activities;
- report on related parties transactions;
- granting of loan facilities;
- approval of internal regulations and policies;
- information on pending litigation;

In addition to the above topics, having in view: (i) the impact of the Covid-19 pandemic breakout at the beginning of 2020, (ii) the declaration of a state of emergency at the national level and the related effects generated at the Bank level, and (iii) the imperative of a prudent, effective and efficient risk management in the new reality, the members of the Supervisory Board and the consultative Committees set up at the level of the Supervisory Board have taken decisions and constantly assessed the situation regarding:

- the lending strategies;
- the evolution of the Covid-19 pandemic in Romania;
- the suspension of the payment obligations related to the loans of the Bank's clients affected by the situation generated by Covid-19, according to GEO no. 37/30.03.2020 regarding the granting of some facilities for the loans granted by credit institutions and non-banking financial institutions to certain categories of debtors;
- accessing by the Bank's clients of the guarantee and the State aid schemes within the IMM INVEST Program;
- the evolution of the number of illnesses at the level of the Bank;
- the strategy regarding the way of carrying out the activity by the employees through telework.

Apart from those above-mentioned and in the context of the information periodically presented by the Management Board regarding the Bank's performance and major developments at the level of the Bank, several other specific topics were discussed, thus being ensured a comprehensive level of information for the Supervisory Board on the most important aspects of the Bank's activity, such as:

- information on General Shareholders Meetings' topics, discussions and Shareholders requests or proposals;
- approval of the Bank's overall 2021 strategy and business risk strategy;

- acknowledgement of the results of the stress testing in UCB;
- evolution of the Bank's Board of Directors, as follows:
 - Supervisory Board held on 30.09.2021 decided upon:
 - Termination of the mandate as Member of the Supervisory Board of UniCredit Bank S.A. of Mr. Niccolo Ubertalli as of 07.09.2021
 - Supervisory Board held on 02.03.2021 decided upon:
 - Appointment of Mr. Dragos Marian Birlog as member of Management Board, Executive Vice-President, from 08.03.2021 until 17.04.2023 (approved by NBR on June 10, 2021)
 - Supervisory Board held on 24.06.2021 acknowledged:
 - Termination of the mandate of Mrs. Tzvetanka Gueorguieva Mintcheva as Member of Management Board of UniCredit Bank S.A., Deputy CEO of the Bank, as of June 30, 2021.
 - Supervisory Board held on July 15, 2021 decided upon:
 - appointment of Mrs. Feza Tan as member of Management Board, Deputy CEO to replace Mrs. Mintcheva (approved by National Bank of Romania on November 26, 2021).

The advisory committees subordinated to the Supervisory Board are the following:

- Audit Committee
- The Risk Management Committee
- Nomination Committee
- The Remuneration Committee

The composition of the consultative committees subordinated to the Supervisory Board has been updated during the Supervisory Board meeting dated 02.03.2020 in order to ensure the most adequate structure of such, given the specialization requirements, expertise and independence of certain members.

17. COVID-19

17.1 Overview of the measures from European Central Bank, European Banking Authority and National Bank of Romania

During 2020 and 2021, the Board of Directors of the European Central Bank (ECB) has decided a number of measures to ensure that its directly supervised banks can continue to fulfil their role in funding the real economy given the economic effects of the Covid-19.

As well, the European Banking Authority (EBA) issued several statements to explain a number of interpretative aspects on the functioning of the prudential framework in relation to the classification of loans in default, the identification of forborne exposures, and their accounting treatment. These clarifications help ensure consistency and comparability in risk metrics across the whole EU banking sector, which are crucial to monitor the effects of the current crisis.

These measures are detailed in all transparency report (Pillar 3 report) disclosed during 2020 and in transparency report (Pillar 3 report) disclosed during Q1 2021. All transparency reports are published on the Bank's website in the Financial Reports section.

During 2020, the National Bank of Romania (NBR) adopted a package of measures aimed at mitigating the negative effects of the crisis generated by the coronavirus (Covid-19) pandemic on households and Romanian companies.

In 2021 the NBR additionally took the following measures:

- After cut the monetary policy rate by one percentage point (pp) in total during 2020 year, the NBR completed the relaxation cycle in January 2021 by a last cut with 0.25 pp to 1.25%;
- As result of decrease of uncertainties regarding economic and financial developments, the NBR Board of Directors announced in March that it approved the calendar of meetings on monetary policy issues for 2021, after it was suspended during the previous year, and monetary policy meetings were held whenever necessary.

17.2 Measures taken by the National Bank of Romania and by the Romanian State

COVID support

Although the pandemic situation improved significantly during 2021 and had a lower impact on economic activity, most of the support measures from 2020 were efficient and were continued in order to avoid the potentially negative consequences of a too early withdrawal of stimulus. Thus, the government support measures for employers (such as furlough support, facilities for employing young graduates or unemployed over 45 years old and several other measures) were kept in place in 2021, while the moratorium on loans was extended until March 2021. At the same time, the "IMM Invest" program was allocated RON 15bn in 2021 in loans to SMEs, while large companies (turnover > EUR 20mn) benefitted as well from government support programs. Moreover, the first NRRP transfers arrived at the turn of 2021, totaling around EUR 3.8bn. Next Generation EU (NGEU) grants and delayed transfers from the 2014-2020 EU budget are expected to support public investment in 2022 and beyond.

Government measures as per EGO 37/2020 regarding the postponement of loan repayments

On 30 March 2020 the Government adopted the Emergency Ordinance 37/2020 which requiring banks to provide moratorium to all customers impacted by Covid-19. Application Norms were entered into force on 6 April 2020 and it covers a maximum period of 9 months of payment postponement, upon request from customers, but not later than 31 December 2020. According to the last Government Emergency Ordinance (OUG 227/2020), the clients can postpone their reimbursements up to 31 March 2021. In order to access this

facility, debtors must declare on their own responsibility that they have registered a decrease in income or cash collected by at least 25% in the last 3 months prior to requesting the suspension of payment obligations by reference to the similar period of 2019/2020.

IMM Invest Romania program

Through the IMM Invest Romania program, the SMEs affected by COVID-19 outbreak can cover their liquidity needs for current operations or investment needs by accessing financing solutions (both working capital or investment loans) from the banks under FNGCIMM guarantee scheme (on behalf of Ministry of Public Finance). For 2021, the total ceiling of guarantees that can be granted is worth 15 billion lei, of which 1 billion lei is allocated for the AGRO IMM INVEST program. The period until which registrations can be made is December 31, 2021. At the same time, the program was changed in order to include IMM Factor and AGRO IMM Invest.

The maximum loan exposure toward a single beneficiary is RON 10mn with a maximum tenor of 72 months for investment loans and RON 5mn with a maximum tenor of 36 months for working capital loans.

17.3 Impact of COVID 19 outbreak on the financial & prudential position of the Group

After a year 2020 with difficult market conditions in the context of the pandemic, in which the **Bank** had a very prudent risk approach, in 2021 the lending accelerated, both in the Companies segment and in the Individuals segment, through newly financed volumes higher than the similar period of last year. Operating income increased YoY, supported by commission income and net interest income supported by the increase of lending volumes. In 2021, the cost of credit risk improved due to the quality of the loan portfolio, significant recoveries and the resumption of payments from customers who benefited from their suspension in the context of the pandemic while the non-performing loans ratio decreased gradually.

Regarding **UCLC**, the negative impact of Covid-19 gradually decreased in 2021. The newly financed volumes signed are 27% above the previous year, while interest income was higher than the previous year, as were other types of operating income, contributing to a higher Gross Operating Profit than the previous year and the budgetary estimates.

In the context of Covid-19, **UCFIN** has taken a series of measures to protect its net assets and ensure the continuity of the lending activity in the future period. These measures (taken during 2020 and continued in 2021) implied new business calibration with credit risk policies assumed during the Covid-19 outbreak, leverage on UCB banking products (i.e. approving new customers only if their monthly income is cashed in the accounts opened with the UCB) and increased attention to debt collection area.

The Group has a limited estimate of the impact of Covid-19 on its future financial position due to significant uncertainties, but has analyzed several scenarios and considers that the assessment of the business continuity principle is appropriate and there is no risk in this regard over the next 12 months.

Liquidity & solvency position

During 2021 the Group continues regularly to assesses the impact of the Covid-19 outbreak in its business, risk profile and prudential and performance indicators. In this sense, the Group evaluates its performance based on stress testing scenarios on key performance and prudence indicators, strict monitoring of position and liquidity indicators (mainly liquidity coverage rate - "LCR" and liquidity quick ratio), monitoring the evolution of government interest rates due to the high level of market volatility and its impact on the capital base and monitoring the simulations of solvency indicators. The Group stress test results are comfortable; both in terms of solvency and in terms of liquidity UniCredit Romania Group expects to maintain a sound position as compared to regulatory minimum ratios.

Solvency

During 2021 the Group it continued measures for capital preservation considering Covid-19 development such as:

- Strict monitoring of capital position;
- The planned distribution of dividends for the financial year ended 31 December 2020 did not take place, so the entire consolidated profit (RON 493 million) was kept in own funds;
- Periodic simulations at consolidated level by using stress testing methodologies regarding the increase of the exchange rate, the increase of the interest rate and the increase of the non-repayment probabilities.

ANNEX 1: DISCLOSURE FOR UNICREDIT CONSUMER FINANCING SA

1. GENERAL REQUIREMENTS

1.1. Strategy and general framework of risk management

UniCredit Consumer Financing (UCFIN) defines specific strategies and policies of risk management for the following types of risks, in a non-exhaustive manner:

1. Credit Risk
2. Market Risk
3. Liquidity Risk
4. Operational Risk
5. Reputational Risk
6. Currency risk
7. Real Estate Risk

1.2. Structure and organization of the risk management function

The risks' control structure is based on several operational and control functions, defined as per the provisions of the Organizational and Functioning Regulation, as well as with the existent Group-level provisions.

Supervisory Board (SB)

The SB is responsible for the set up and keeping of a proper and effective internal control system.

In the context of internal control and significant risks management the Supervisory Board is responsible for the approval of the risk strategy. In connection with the strategic objectives of UCFIN, the Supervisory Board establishes a certain risk profile on an annual basis, the way to determine this profile and the frequency of monitoring.

Management Board (MB)

The Management Board is responsible to implement the strategy for defining the risk profile of the company, drafted by the Risk Division together with the GBS Division and approved by the Supervisory Board.

In this respect, the management implements/ensures: policies for measurement, monitoring and control of risk, reporting system for the measurement of exposures and of other aspects related to risks, in order to be reported to the proper management levels.

For the support of the risk management activities, specialized committees are set-up within the financial institution: Audit Committee, Risk Management Committee and Credit Committee.

Audit Committee, according with the Internal Governance Manual of UCFIN and with its own rules of functioning, as approved by UCFIN, monitors the performance of the internal control system.

Risk Management Committee performs the activity related to risks identification, assessment and management according to the provisions of Organization and Operation Regulation of UCFIN and to the provisions of its own approved regulation.

Risk Management Committee is a permanent organizational structure, constituted according to the legislation in force (NBR Regulation no 20/2009 regarding the non-banking financial institutions), having at least the following responsibilities, according to the NBR Regulation:

- to ensure the informing of Supervisory Board about the issues and the significant evolutions which may influence the non-banking financial institution results and its risk profile;

- to develop adequate procedures for the identification, evaluation, monitoring and control of the significant risks;
- to provide Supervisory Board sufficiently detailed and timely information, which will allow it to know and evaluate the management performance regarding the significant risks control and monitoring, according to the approved procedures, and the overview performance of the non-banking financial institution;
- to regularly inform Supervisory Board about the non-banking financial institution exposure to risks, and immediately if significant modifications are occurring in the current or future exposure of the institution to the identified risks.

Risk Division

It operates as a permanent organizational structure, with responsibilities related to the administration of the general framework of credit risk and operational risk management.

The Risk Division offers support to the Risk Management Committee and the company's management through the current monitoring of the credit risk and operational risk.

In order to ensure an optimal credit and operational risk management at portfolio and individual level, at the time of making the loan decision for each loan application, Risk Division is structured in 4 departments for administrating and monitoring risks. Their responsibilities are detailed in the Company's Organization and Functioning Regulation:

- Credit Risk Management Department
- Underwriting Department
- Recovery Department
- Internal Control, Operational and Reputational Risk & Fraud Prevention Department

Finance and Planning Area

This area sustains Risk Management Committee and the company's management through support offered within current monitoring process of the market and liquidity risk, process performed by relevant departments within UniCredit Bank.

Marketing and Product Development Department

Marketing and Product Development Department offers support to Risk Management Committee and the company's management through the current monitoring of the reputational risk.

Operational risk is managed by all the departments whose activities incur operational risks. The monitoring is ensured by regular verification of the limits of operational risk indicators.

Other organizational structures with responsibilities related to risk management

Risk management function is supported at company level through other specialized committees (Discipline Committee, Norms and Procedures Committee, Projects Committee, Product and Pricing Committee, Business Continuity and Crisis Management Committee, etc.).

2. RISK ADJUSTED EQUITY

For the calculation of regulatory equity requirements in 2021, UCFin followed the requirements of Regulation No.20/13.10.2009. According to this Regulation non banking financial institutions must keep own funds at least at the level of minimum required subscribed capital and the aggregated exposure of the institution should not exceed 1500% of the own funds. Within UCFin the tasks related to the calculation and monitoring of needed capital are performed by the specialized departments of Financial and Risk areas.

For complying with capital adequacy requirements established by NBR Regulation No. 20/13.10.2009 and Group rules, UCFin is involved in a permanent evaluation process of capital requirements, for sustaining current and future activity, which implies the following processes: Budgeting, Monitoring and analysis and Forecasting.

3. CREDIT RISK: GENERAL ASPECTS

3.1. Assessment and identification of the credit risk

In determining the risk, the following elements are considered:

- a) the current financial situation of the customers and their repayment capacity;
- b) the capacity to apply, from legal point of view, the contractual commitments;
- c) the financial commitments with persons having special relationship with the non-banking financial institution;
- d) the purpose of the credit and the source of its repayment;
- e) the debts service history for counterpart;
- f) other specific characteristics of the customer and of the transaction that might affect the collection degree of the principal and the interests.

3.2. Credit risk management

The objective of credit risk management is to maximize profit by maintaining exposure to credit risk within acceptable limits.

The credit risk management is performed taking into consideration the credits both at individual level and at whole portfolio level and includes the consideration of the qualitative and quantitative aspects related to risks.

3.3. Principles and practices used in credit risk management

Credit risk management implies a set of coherent principles and practices, oriented towards the following main objectives:

- a. Establishment of a framework and adequate parameters of credit risk;
- b. Promotion and operation of a healthy and solid credit granting process;
- c. Promotion and maintenance of an adequate process for credits administration, measurement and monitoring;
- d. Permanent control over the quality of the loan portfolio.

Also, the credit risk management is performed depending on the stage of the credit granting process, as well as in the monitoring phase of the loans granted to customers, taking into account the development of the contractual relationships.

4. MARKET RISK

Market Risk is defined as the risk of incurring losses due to unfavorable fluctuations of market prices (i.e. prices of shares, interest rates and exchange rates)

In case of UniCredit Consumer Financing, the market risk has the following two components:

- FX risk
- Interest rate risk

The main sources of the interest rate risk are: the poor correlation between maturity (for fix interest rate) and re-pricing date (for variable interest rate) for interest bearing assets and liabilities, negative evolution of the slope and the shape of the yield curve (unparalleled evolution of the interest rate performance of incomes generating assets and interest bearing liabilities), poor correlation regarding the adjustments of collected and paid installments for different financial products having similar characteristics of interest reset.

The market risk management is performed through:

- identification, monitoring, analysis and control of market risks: FX risk, interest rate risk, according to group standards and NBR requirements;
- development and implementation of risk management strategy;
- reporting of market risk issues to the management of the Company.

The department responsible for monitoring market risk is UniCredit Bank's Financial Risk Department.

The roles and responsibilities of market risk management are detailed in the Market Risk Rulebook for UCFIN.

5. LIQUIDITY RISK

The liquidity risk is the probability of the Company falling short of its due payments resulting from its contractual relations with costumers and third parties.

In case of UniCredit Consumer Financing, the liquidity risk has the following two components:

- the risk to not respect in time the obligations resulting from its contractual relations with customers and partners, or
- the risk of managing opportunity costs, if the cash available is too high and not invested with high performance (in credit activity).

Liquidity risk management has to be done in conjunction with other significant risks, which may influence the liquidity position: credit risk, operational risk, reputation risk, interest rate risk, foreign exchange risk etc.

UniCredit Bank is the principal bank for liquidity risk monitoring of UniCredit Consumer Financing. UCB monitors the liquidity position of UCFin and ensures that liquidity level is sufficient in order to cover the payment obligations which become due:

- UCB coordinates financing strategy and placement of the liquidity excess
- UCFin needs to address directly and exclusively to UCB any liquidity gap (foreign or local currency) and ultimately to Holding, if the liquidity gap is in foreign currency or if the legal or regulatory limits related to funds transfer are already met.

6. OPERATIONAL RISK

UniCredit Consumer Financing Operational Risk Management complies with legal and Group regulations in force, and it is performed according to the internal policies and procedures.

Operational Risk is considered a significant risk and is integrated into the UCFIN's policy and strategy regarding significant risks.

Operational risk means the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. Operational risk includes legal risk, but excludes strategic and reputational risk. Legal risk includes, but is not limited to, exposure to fines, penalties, or punitive damages resulting from supervisory actions, as well as private settlements.

Operational risk events are those resulting from inadequate or failed internal processes, personnel and systems or from external or systemic events and other external events: internal or external fraud, employment practices

and workplace safety, clients' claims, products distribution, fines and penalties due to regulation breaches, damage to Bank's physical assets, business disruption and system failures, process management.

Operational Risk Team is an independent function in charge with operational risk control, within the Risk and Collection Area and reporting directly to Chief Risk Officer (CRO).

The Operational Risk Team promotes the actions related to operational risk area and its responsibilities are:

- Manages the collection and validation of the operational risk events, analyzes the exposure to operational risk, examines scenarios, establishes action plans based on the results of the operational risk indicators;
- Provides training and interact with all UCFin departments in order to achieve the above responsibilities;
- Monitors the UCFin Operational risk exposure in accordance with the standards and policies defined at Group level;
- Controls the quality of operational risk loss data and, periodically, provide data on operational risk (internal losses, risk indicators, scenario analysis, risk mitigation measures, reports to management);
- Provides support on risk appetite, budgeting and capital allocation, including operational risk mitigation costs;
- Proposes operational risk mitigation plans, including insurance, and inform the relevant structures at the institution level;
- Assures, in collaboration with the Organization and Project Management Department, the implementation of mitigation actions proposed in the Permanent Working Group and escalates to the competent bodies, if case;
- Identifies, in cooperation with relevant functions, operational risk indicators and scenario analyses, and ensure the quality of data collected, cooperate in analyzing the impact of operational risk when introducing significant new products and significant changes in activities or organizational structure of UCFin;
- Verifies and assures that the company has plans for business continuity in force and that they are regularly updated and tested.

The main instruments used for the management and control of operational risk in UniCredit Consumer Financing are internal operational risk events collection, monitoring of the operational risk indicators and operational risk reporting.

Collection of operational risk internal events is a main source for identification and quantification of operational risk. The process of collecting loss events is established through well-defined rules for collection and validation of the data and for reconciliation of the loss data against the accounting bookings, in order to ensure completeness, accuracy and timeliness of data. The responsibilities regarding operational risk reporting are included also in the procedures specific to each area of activity.

The completeness and correctness of the operational risk database is ensured through the analysis of internal accounts, according to the process described in the Rules regarding reconciliation of accounting bookings against operational risk events.

At the institution level, there are implemented a number of **operational risk indicators**. The risk indicators are quantitative values that reflect the operational risk profile of a process or product. The value of an indicator should be correlated to changes in the level of risk. The process of monitoring the operational risk using indicators will help the responsible for operational risk management processes and responsibilities with:

- preventive control of the identified risk at the institution level (early signaling system of risk);
- suggestions for risk mitigation and control;

- effective measures to reduce operational risk.

Quarterly reports regarding the exposure to operational risk, which analyses the aspects such as: financial losses detailed on event types, operational risk losses limit usage, capital requirement for operational risk, cross credit events, mitigation actions regarding operational risk are discussed in the Risk Management Committee. The reporting system includes at least bi-annual reports to the Supervisory Board.

The **capital requirement for operational risk** for UniCredit Consumer Financing is determined by the Group using the Basic Indicator Approach (BIA). The minimum capital requirement for operational risk according to BIA approach consists in applying a percent of 15% to the average of the relevant indicators of the last three ended financial years.

7. REPUTATIONAL RISK

7.1. Assessment and identification of reputational risk

Identification and assessment of reputational risk is performed at the overall level of Company and also at all organizational level of the Company and taking into account all the Company's activities, the outsourced activities, and the occurrence of some new activities.

From the point of view of reputational risk potential, a special attention must be granted to the following aspects:

1. Reaching or exceeding the limits established for the significant risks;
2. Reaching or exceeding some limits of the financial indicators (liquidity, solvability, etc);
3. Electronic mail – risk potential due to sending, by error or with intention, of some confidential/wrong information from the inside of Company to outside by e-mail, containing identification data from Company side;
4. External communication through unauthorized staff – risk potential by presenting partial data, personal points of view or breaking the confidentiality norms;
5. Staff fluctuations – pressure from the information confidentiality point of view, and also risk from procedures acquirement point of view regarding the Company's processes and especially of internal and external communication rules;
6. Negative media campaigns – risk potential by unilateral presentation of some aspects from Company's activity;
7. Focusing on specific sites of some opinion exclusive from unsatisfied customers, argued or not, aspects in question and notified to the responsible divisions/departments by the Company's staff;
8. Development of an adequate internal control system for supervising and performing of activities within the Society or for outsourced activities.

7.2. Reputational risk monitoring

The reputational risk monitoring is performed through:

- monitoring of all the publications related to UniCredit Consumer Financing;
- evaluation of articles which may represent a potential reputational risk for UniCredit Consumer Financing; establishment, together with the management of the communication strategy for each case;
- IT system monitoring and establishment of clear and restrictive procedures regarding the using ways of e-mail during the relation with the customers and in the external communication.

7.3. Management of the reputational risk

The general strategy in administrating this category of risk is realized, without being limited to this, at:

1. Applying in a proper manner the internal norms regarding know your customer policies and the regulations regarding anti money laundering.
2. Selection, through a rigorous analysis, of the clients that require credit facilities;
3. Elaboration of security politics/plans/measure for certain activities/services of the Company;
4. Adopting an adequate form of presentation/communication of informative materials and of the ones for the promotion of the activity and the products of the Company;
5. Establishing working instructions and competencies for decision taken in case of crisis situation;
6. Other measure for administration of reputational risks that the Society considers necessary;
7. Evaluation of the reputational risk, qualitative or quantitative (to be taken into consideration the losses produced by the negative publicity, litigations, etc.).

7.4. Diminishing the reputational risk

In crisis situations, with impact for the appearance of the reputational risk, the following aspects are to be considered:

- Establishing the communication strategy (definition of the key messages transmitted and promoted; definition of the channels used for communications);
- Transmitting messages through media communicates, briefly and promptly, periodically updated (the success of the communication is assured by an adequate information flow from the Management Board and the business departments involved);
- Trainings with the call center personnel for establishing the methods/structures for answer providing, depending on specific cases;
- Establishing the procedures and competences of decision taking in case of crisis situation.

Usually, the Company will try to limit the reputational risk through procedures, rules and flows specially created in this respect and through a continuous and sustained communication, transparent and efficient.

For the administration and monitoring of the reputational risk all the departments within UCFin are responsible.

8. MINIMUM CAPITAL REQUIREMENTS FOR CREDIT RISK

UniCredit Consumer Financing, as part of UniCredit Group, established as strategic objective the maintenance in 2021 of a moderate risk profile. Even so, having in mind the present characteristics of the market and the financial crisis, it is possible that independently of the adopted measures, the limit set for the risk profile indicators to be exceeded. In this respect, the exceeding of the indicators of moderate risk is taken as trigger point. Thus, from the strategic point of view, the targeted risk profile for 2021 is a moderate risk, but the institution is prepared for a medium risk profile, reaching this limit not being an objective by itself.

Required capital for coverage of unexpected losses

According to the Strategy for management of significant risks in UniCredit Consumer Financing, the institution must calculate the capital requirements for covering the significant risks. Normally, this required capital (economic capital) is different from the minimum capital calculated according to the regulations in force regarding capital adequacy.

For local consolidation purposes, the economic capital for UCFin, calculated through the Financial Investment Risk method is received from the Group twice a year. The method is applied for “small legal entities” and covers all significant risks (credit, operational and market).

9. CREDIT RISK MITIGATION TECHNIQUES

The Company diminishes the credit risk through:

- granting credit exposures towards counterparties with performing rating;
- the customer rating is periodically reviewed, at least annually;
- the credit granting and valuation of credit risk process is periodically reviewed with the aim of its adequacy to the size and complexity of the activity, to the development strategy, etc. and, not least, to the legal regulations in force;
- detailed analysis on the entire loan portfolio is periodically performed;
- identification of the credits to be valued in view of calculating provisions on individual basis and segmentation of the credit portfolio on buckets with similar credit risk characteristics for the analysis and valuation on collective basis;
- judgments on the quality of the credit risk of the credit portfolio takes into consideration relevant internal and external factors that might affect the collection level of the credits (such as political, geographical, economical and industrial factors);
- implementing a systemic and logical method of consolidating the estimated losses and ensuring that the registered provisions are aligned with the applicable accountancy environment and with the relevant prudential regulations;

Considering the development of the Company’s activity and the modifications registered in the general strategy, the limits regarding credit risk are reviewed and modified whenever necessary, in order for an adequate correlation to be reached between the Company’s risk profile and the targeted profitability

A well-structured segregation of duties is considered in order to ensure that responsibilities that might drive to conflicts of interests are to be allocated to different departments/divisions.

The Company has IT systems due to which the credit risk issues are reported on time (for instance: monthly close monitoring of the credit portfolio can help identify certain risk concentrations).

A rating system or scoring is used in credit risk valuation, system that facilitates the analysis of the information and elements presented in the financial documents of the customer (private individual).

With the aim of preventing the losses due to non-payment within a credit transaction, UCFin monitors the fulfilment of the client’s obligations through:

- constant monitoring of the turnover through the customer’s accounts – this must be relevant in relation with the granted loan amount;
- constant monitoring of the fulfilling of the credit contract stipulations (including the conditions);
- classification and allocation of loan loss provisions;

If deviations from the contractual conditions or deterioration of the customers’ financial situation and/or solvency are identified, the Company must come with a written proposal to the customer in order for him to take some specific steps to eliminate the reasons of the deviations.

The Company accepts exposures from the credits granted to private individuals differentiated according to the customer’s associated risk and to the type of transaction/product. The correlation of the credit risk classes with rating classes is established through internal specific procedures regarding the provisions calculation and

determination. As the credit activity is permanently growing, the credit portfolio structure might suffer modifications, considering the Company's development strategy. The departments responsible for identification, assessment, management and monitoring of the credit risk are the following: departments within the Risk and Collection Division, Operations Department, IT&C Department and Accounting Department.

ANNEX 2: DISCLOSURE FOR UNICREDIT LEASING CORPORATION IFN SA

1. GENERAL REQUIREMENTS

1.1. Strategy and general framework of risk management

UniCredit Leasing established a comprehensive and independent risk management function under direct supervision of the management body, having personnel with relevant experience, adequate to the company's risk profile, and able to play a significant role in the processes of identification, measurement and assessment of risks.

Risk management function ensured that all significant risks were adequately identified, measured and reported. The company identified the following significant risks:

1. Credit risk
2. Market risk
3. Liquidity risk
4. Operational risk
5. Reputational risk
6. Business risk
7. Real estate risk
8. Management of the risk associated to outsourced services

As well as:

9. Anti-money laundering, fighting terrorism financing, financial sanctions

The risk management function had an important role within the company, ensuring the existence of effective risk management processes. Risk management function was realized within the company by entities from CRO Area and CFO Area:

- Underwriting Department:
- Risk Strategies and Control Department
- Operational and Reputational Risk Technical Structure
- Restructuring and Workout, incl. Restructuring, Collection, Monitoring and Workout
- Asset Management Department
- Planning and Control Department
- Strategy, Data Governance and Cash Management Department

1.2. Structure and organization of the risk management function

The risk control structure is based on a multitude of operational and control functions, defined in accordance with the Regulation of Organization and Operation of UniCredit Leasing Corporation IFN SA (UCLC), but also with the rules existing at group level.

Some organizational structures are:

The Supervisory Board (SB) approved the company's credit risk strategy, which was monitored on a periodical basis.

The Board of Directors is responsible for implementing the strategy and the policies on risk management.

Risk Management Committee (RMC)

Risk Management Committee is a permanent advisory committee subordinated to the Supervisory Board, that manages significant risks, risks with significant impact on the patrimonial and / or reputational situation of the company (credit risk, market risk, operational risk and reputational risk), as well as the risks associated with outsourced activities.

Audit Committee (AC)

Audit Committee is a permanent and consultative committee responsible to assist the Company's Supervisory Board in defining the principles governing the entity's entire internal control system, based on a risk-oriented approach, and assessing its effectiveness and efficiency, so that the main risks are properly identified, then measured, managed and monitored. The Audit Committee is also responsible for assessing the adequacy of the accounting principles used to prepare the financial statements and for overseeing the effectiveness of the external audit process and the work of the external auditor.

Credit Committee (CC)

The Credit Committee is a permanent, deliberative committee, constituted under the subordination of the Management Board, which meets periodically, once a week or whenever it deems appropriate and has the competence to exercise decisions regarding the activity that generates the credit risk.

Special Credit Committee (SCC)

Special Credits Committee is a permanent, deliberative committee, subordinated to the Directorate, responsible for defining strategies related to the portfolio of clients under the monitoring of the Restructuring and Debt Recovery Department (e.g. decisions on debt recovery and asset restructuring, approving restructurings within delegated powers, granting new financing for clients managed within the department).

Operational Permanent Work Group (PWG)

Operational Permanent Work Group Committee is a permanent, consultative working group, subordinated to the Management Board, which aims to identify, classify and evaluate the operational risk in the company, as well as to propose measures to reduce the operational risk and to monitor their implementation.

Reputational Risk Committee

Reputational Risk Committee is a non-permanent, deliberative committee subordinated to the Directorate, which meets whenever necessary, representing: a single body dedicated to discussions and decisions on transaction/initiatives/projects related to sectors sensitive to reputational risks- according to policy regulations dedicated, but also for all other cases coming from the sales area (for example, other relevant sectors or relevant customers) as well as a body that ensures awareness and attention regarding the assessment and management of reputational risk.

Leased Asset Management and Remarketing Committee (LAMRC) is a permanent, deliberative committee, subordinated to the Directorate, which ensures the resale flow of repossessed assets, monitors the flow and approves the sale of assets, and at the strategic level approves periodic updates of the components of the resale strategy. in the possession / patrimony of UCL as a result of the termination of the leasing contracts or as a result of the execution of the financing contracts or of the guarantees ("the goods taken back in possession"), as well as of the monitoring and evaluation strategy regarding the assets to be financed. It also

approves and proposes for approval to the representatives of the parent company the deviations and adjustments from the Policy for monitoring, evaluation and resale of the financed assets.

Credit Operations Division (CRO)

CRO Division works like a permanent organizational structure, with responsibilities related to management of the general framework of risk management. CRO division supports the Risk Management Committee and the Board of Directors through significant risks management monitoring systems.

2. RISK CAPITAL ADEQUACY

For the calculation of regulatory capital, UCLC applied during 2021 the requirements of Regulation No. 20/2009 with its further changes and updates. In accordance with this Regulation the non-banking financial institutions must keep own funds at least at the level of minimum required subscribed capital and the aggregated exposure of the institution should not exceed 1500% of the own funds. In order to calculate the regulatory capital, UCLC used during the year 2021 the approach imposed by local regulations (NBR) for credit risk.

Within UCLC, the tasks related to the calculation and monitoring of needed capital are performed by the specialized departments of Financial Division and CRO Division.

For complying with capital adequacy requirements established by Regulation No. 20/2009 and Group rules, UCLC is involved in a permanent evaluation process of capital requirements, for sustaining current and future activity, which implies the following processes:

- Budgeting
- Monitoring and analysis
- Forecasting

For the **budgeting** process:

- The different business segments provide the budgeted volumes for the following year;
- Risk Strategies and Control department estimates the credit risk provisions based on the above volumes;
- Strategic Planning and Control Department calculates the capital requirement and compares it with the existing capital;
- In order to assure an adequate level of capitalization, RWA optimization actions are considered. Starting from the capitalization objectives, UCLC establishes measures for optimizing the structure of its loans and guarantees.

Monitoring and analysis process implies:

- Monthly calculation of capital requirement;
- RWA optimization actions;
- Optimal capital allocation in order to add value to the shareholders.

Forecasting process:

- During the entire year, several forecasting actions are performed in order to have estimations as accurate as possible of the capital requirement evolution.

3. CREDIT RISK: GENERAL ASPECTS

3.1 Assessment, identification and credit risk management

UCLC is exposed mainly to credit risk in financing activities. Credit risk is the most important type of risk the company is facing. Thus, the most important risk generating activity is financing, but any other activity of the company may be generating potential credit risk (extra balance sheet commitments).

The following types of risks are considered components of credit risk in our company:

- A. The risk of default;
- B. The concentration risk;
- C. The residual risk.

Credit risk management involves a set of principles and practices oriented towards the following directions:

1. Establishing an adequate framework and parameters for credit;
2. Promoting and operating a healthy and robust process to grant funding;
3. Promoting and maintaining an adequate management, measurement and monitoring financing process;
4. Providing a permanent control on loan portfolio.

3.2 Management of Credit Risk

The credit activity in UniCredit Leasing was performed according to the legal regulations in Romania, the rules and regulations issued by the National Bank of Romania. Also the credit activity took into consideration the internal regulations of UniCredit Leasing, aligned with the UniCredit Group standards.

The Supervisory Board approved the company's credit risk strategy, which was monitored on a periodical basis.

The company established steps and disposed of instruments both for identifying, measuring, monitoring and controlling the credit risk.

The mission of credit risk management function was to:

- Implementing internal processes and regulations which ensured that lending decisions were taken in compliance with the legal and internal provisions in force and were not affected by conflicts of interest
- Implementing policies and strategic guidelines for the identification, measurement, assessment, monitoring, reporting and control or diminishing of credit risk;
- Implementing strategies and risk appetite;
- Continuous analysis of clients' repayment capacity and willingness to repay the debts at due date, monitoring of documentation, contractual clauses, collaterals or other risk mitigations techniques;
- Drafting of credit risk reports and internal reports to the Group and other counterparties;
- Permanent monitoring of various credit risk portfolios, for the purpose of identification and proper management of problem and for applying the adequate adjustments and provisions;
- Recovering and restructuring of UCL exposures in default; enhancing collections actions in order to reduce UCL costs triggered by loan loss provisions.

Measures taken by UCLC in the direction of credit risk mitigation are focused on:

- Evaluation of the clients' repayment capacity, on individual level;
- Avoidance of credit concentration on: economic sectors and asset classes (difficult to sell in case of repossession).
- Improving the monitoring system and automatic classification of portfolio on monitoring classes
- Dispersion of credit risk through the diversification of the client database
- Monitoring of the exposure undertaken by the company towards a large exposures and affiliated parties;
- Enhancement of the Watch list process having as main goal the identification and follow up (close monitoring) of the loan exposures with high degree of risk and proposal of necessary measures for decreasing or limiting the potential losses;
- Carrying out sustained activities for the debt collection;
- Periodical review (calibration) of the client analysis systems used for loan granting (scoring and rating systems);

Management of the Credit Risk was achieved through all the departments from CRO area having the following responsibilities:

- Underwriting Department:
 - Analyses the financing files and issues a recommendation or a final decision depending on the competence level. Ensures compliance with Group lending policies, both through developing new internal regulations and amending existing ones according to the Group policies;
 - Endorses the new product proposals or changes of the existing products;
 - Monitors and reviews the scoring system;
 - Monitors and reviews periodically the company's non-retail customers' portfolio performance;
 - Implementing of group policies;
 - Portfolio Monitoring;
 - Periodical reports;
- Risk Strategies and Control Department:
 - Monitors the Company customers' portfolio based on specific indicators and reports;
 - Monitors quarterly the credit risk strategy;
 - Regularly prepares reports for Risk Management Committee, Supervisory Board and Management Board regarding significant risks of the Company;
 - Monitors the indicators established in accordance with the Company risk profile;
 - Establishes the provisioning process by preparing and reviewing the specific internal regulations (for provisions calculated in accordance with the IFRS requirements);
 - Monitors the customers' portfolio evolution (on customer segments, default types, industries, types of financed assets, sales channels, etc.);
- Restructuring & Workout Department:
 - Achieve soft collection activity for clients with higher exposure and monitors and support the external partners in the collection activity;

- Define strategy and identify solutions for the cases which are in the competence of Special Credits Committee or of the Group;
- Manages the repossession activity (externalized);
- Manages the relation with the lawyers on insolvencies cases, criminal charges and legal execution files;
- Defines the restructuring strategies, negotiates, approves, implements and monitors the restructuring cases;
- Monitors the clients with risk of default and takes pro-active measures;
- Implements public and private moratoria for clients affected by Covid-19 pandemic;
- Pro-active approach in collection activity for clients benefiting from public or private moratoria;
- Prevention actions in collection area in light of new DoD regulations; Defines the restructuring strategies, negotiates, approves, implements and monitors the restructuring cases.

Asset Management Department:

- Performs the Initial Valuation of financed assets, during this process assesses the remarketing quality of the financed assets, issues opinions initial valuation, classifies assets and recommends financing structures according to the depreciation curve of each asset being financed and the possibilities for recovery and remarketing in case of repossession
- Is responsible for Asset Portfolio monitoring, statistical appraisal for mobile asset portfolio, inspections on the field for assets with acquisition value above established threshold - Performs assets appraisal, monitors and validates external appraisals for the second hand financed assets or real estate financing

Reporting and controlling tools on credit risk management line:

- Group Reporting
 - Risk Report - monthly - provides different analysis to monitor the credit quality of the portfolio (evolution of defaulted loans, divided by kind of leased asset, industries, analysis on LLP and Coverage, Expected loss);
 - Strategy Monitoring Report – quarterly – helps in monitoring the credit risk strategy on industries; FINREP – quarterly – provides detailed information regarding the non performing portfolio and its evolution.
 - Annual Stress Test exercises regarding IFRS9 calculation
 - COREP Reporting, including full alignment with FINREP reporting
- Reporting to the management
 - Quarterly monitoring the company's risk profile through relevant indicators for the business;

3.3 Treatment and valuation of credit risk

For a prudential valuation of the credit exposures, there were implemented rating systems based on which the exposures are classified considering the related credit risk assessment for each debtor, through a general scale of default risk assessment.

Internal ratings and default probability play an essential role in the entire credit risk management process within UCLC.

Rating valuation is an important part of the credit approval process. Credit risk tolerance takes into consideration credit granting limitation based on rating classes. Thus, there will be no credit granting to the clients with a non-performing rating (according to internal classification).

Later on, during the credit tenor, the rating information is an important part of monitoring as well as of restructuring and of the progress of the non-performing credits.

Risk reporting and portfolio management framework is focused on the rating information (coming to complete the information of the debt service).

3.4 Determination of value adjustments/ provisions

Approaches and methods applied for the calculation of NBR value adjustments

In order to cover potential credit and investment losses, the company calculates value adjustments according to the NBR regulations in force.

Consequently, for the determination of the adjustments value level, the credit exposures are classified based on the following elements:

- obligor performance category;
- delinquency (number of overdue days);
- initiation of judicial procedures.

The financial performance reflects the economic potential and financial strengths of an obligor, determined based on the analysis of a set of qualitative and quantitative factors.

Approaches and methods applied for the calculation of value adjustments - for the credit portfolio under the Standardized Approach

Provisions represent the loss amount estimated by the company based on impairment models. The company uses two approaches for this estimation:

- Individual assessment
- Collective assessment

Through **collective assessment**, the provisions are calculated on a portfolio level basis by dividing it into similar credit risk characteristics buckets. The performing portfolio is subject of collective assessment entirely, no matter if the exposures are considered significant or not.

The non-performing portfolio is subject of collective assessment only in the in case the exposures are not considered significant.

Through **individual assessment**, the provisions are individually calculated for each individually significant exposure. Individual assessment is a process of measurement of exposure impairment for an individual client.

The individual assessment process has been divided into 2 steps:

- Identification of individually significant exposures and/or exposures of clients which may be individually assessed
- Individual loss estimation for provisioning purpose for the respective exposures.

4. Management of market risk

Market Risk Management activity is performed according to legal regulations in force in Romania, norms and regulations issued by the National Bank of Romania (NBR) and internal regulations, while the application of these regulations is harmonized with the Group Rules of UniCredit.

Market Risk aspects are supervised by Market Risk unit from UniCredit Bank and performed in cooperation with UniCredit Leasing CFO area.

Market Risk management during 2021 was achieved through:

- Identifying, monitoring, analysis and market risks control: currency risk and interest rate risk, according to group guidelines and requirements of the National Bank of Romania;
- Reporting of market risk issues to Risk Management Committee and Management Board;
- Analyzing the evolution of UCL balance sheet considering the evolution of economic variables / market;
- Analysis of foreign exchange position in each currency (RON, EUR, USD);
- Analysis of interest rate position on each type of interest (fixed, variable) and on each maturity;
- Quarterly reporting to Supervisory Board regarding market risk;

In order to mitigate market risk, the Company, during 2021:

- applied the general principle of financing, the Company applies maturity match principle both in terms of interest, currency and tenor complying with the liquidity and market risk indicators;
- transferred the currency risk for the period between invoicing and cash in, to the client, by re invoicing these exchange rate differences (contractual conditions are adjusted accordingly);

During 2021 Basis point Value indicator ("BPV") was below the limit of 150,000 and the Value at risk ("VAR") exposure was below the limit of 1,000,000.

The 2021 Market Risk assessment exercise evaluated the Control system as Adequate.

5. Management of liquidity risk

Liquidity risk reflects the possibility that UCLC can have difficulties in making expected or unexpected cash payments when due, thus affecting daily operations or financial condition of the company.

UniCredit Leasing managed the liquidity risk according to legal regulations in force in Romania, norms and regulations issued by the National Bank of Romania (NBR) and internal regulations, while the application of these regulations is harmonized with the Group Rules of UniCredit.

Liquidity risk is managed by Finance Division

Liquidity Risk management during 2021 was achieved through:

- Ensuring liquidity in EUR and RON;
- Liquidity analysis separately for each maturity (short, long);
- Reporting of liquidity risk issues to UCL management board and Risk Management Committee;
- Quarterly reporting to Supervisory Board regarding liquidity risk.

To manage short term liquidity risk, the Company monitored the daily cash flow forecasts compared with the total liquidity position and the position of the exchange rate.

In order to identify, quantify and report the liquidity risk, in 2021 were taken into consideration the following:

- The Board of Directors of UCL was notified monthly about the situation of liquidity and its evolution over time;
- Department responsible for managing liquidity risk prepared reports for:
 - size / amount and structure of future operations;
 - volume and maturity of assets and liabilities.

To manage and monitor liquidity risk, in 2021 UCL had a set of limits and trigger levels established with Market Risk Management Department within UCB. Also specific reports were used, as follows:

1. In order to manage short term liquidity, the following reports were analyzed:

- Monthly liquidity ratio (cash position) which contains all the available cash in bank accounts owned by UCL;
- A quarterly report on liquidity by maturities which presents the situation of assets (leasing portfolio) and liabilities (refinancing lines) split by maturities.

2. Structural liquidity management and financing needs:

In order to manage and monitor liquidity risk, UCL has monthly calculated the Structural Liquidity Ratio (SLR) and the values registered were in the limit of 90%. According to Risk Management Strategy, the Structural Liquidity Ratio should not fall under the limit of 90% (warning signal at 95%), for LCR indicator the limit is 70% with warning signal at 100% and the Net Stable Funding Ratio (NSFR- no threshold included, but only monitoring). These ratios are monthly monitored and in case is registered an overflow of the limits, will be taken measures to bring back the indicators within the normal limits.

In 2021 there were no deviations of the ratios.

The 2021 Liquidity Risk assessment exercise evaluated the Control system as Adequate

6. Management of Real Estate risk

Real estate risk is defined by the potential losses resulting from market value fluctuations for the Company's own real estate assets, directly owned offices or repossessed assets. Real Estate risk reporting process is subject to the Group policies.

For 2021 the potential losses deriving from market value fluctuation of real estate assets were quarterly reported to the local bank using a dedicated template based on the information received from the Asset Management and CFO area in order to order to upload it in Pillar 2 System for the estimation of the Internal Capital. The output of the calculation is presented at consolidated level by the local bank.

7. Management of Operational Risk

Operational risk management in UCL is done in accordance with the rules and regulations issued by National Bank of Romania, Group recommendations and instructions transpose in internal procedures by Operational and Reputational Technical Structure.

For an efficient operational risk management, the framework implemented within UniCredit Leasing includes clearly defined responsibilities for the identification, measurement, monitoring, mitigation and reporting of operational risk. Also, Operational and Reputational Risk Management function part of the Risk Division has the role of coordinating the operational risk management, performing independent analyses, monitoring and controlling this risk, detailed responsibilities being listed below:

- Issuing, amending and proposing for approval to the competent bodies the general policies regarding operational and reputational risk management, in compliance with the National Bank of Romania regulations and Group instructions and recommendations;
- Ensuring the coordination of operational risk data collection and validation in Group operational risk database;
- Setting and monitoring risk indicators for operational and reputational risks;
- Weekly and monthly reporting to the Group of the relevant operational risk events and economic manifestations;
- Quarterly reporting to the Group of the relevant reputational risk events
- Regular reporting of operational risk information to the relevant Committees according to the internal regulations in force;
- Implementation of risk controlling processes, methods and systems, necessary risk mitigation tools;
- Providing support to other departments regarding operational and reputational risk topics;
- Providing opinions in respect of operational and reputational risks impact in case of new products and significant changes to the existing ones, in line with the legal and internal regulations;
- Providing support in the process of issuance/amendment of internal regulations from an operational and reputational risks perspective, proposing policies, processes, tools and models for controlling operational and reputational risks;
- Monitoring the exposure to operational risks, in accordance to the standards and policies in force;
- Setting-up, organizing and monitoring of mitigation actions defined following the operational risk analyses in relation to operational risk losses, indicators, meetings of the Permanent Working Group, scenario analyses etc;

Delivering trainings to all employees related to operational and reputational risk policies implemented at local level and other operational and reputational risk topics. Main measures taken in 2021 for the management of operational and reputational risk are listed below:

- Implementation and monitoring of the Group operational and reputational risk Strategy at local level;
- Consolidation of operational risk culture across the company in order to have in place an efficient operational risk management process in accordance with the regulations in force;
- Increasing visibility and the level of awareness related to operational risk across the company through trainings, presentations and materials available for all employees and also by organizing an online training followed by a testing for all employees
- Performance of operational risk assessments for relevant transactions and ICT Risk assessments according to Group requirements;
- Collaboration with all departments for collecting operational risk data, assessing operational risks and potential losses and mitigating operational risk exposures;
- Reconciliation of losses recorded in the operational risk database against accounting bookings;

- Annual review of operational risk indicators system and constant monitoring of critical thresholds;
- Improvement of existing reports by including additional information; details regarding analyses and measures agreed in the Permanent Work Group;
- Providing operational and reputational risk opinions regarding new/renewed internal regulations and initiated projects;
- Periodical reporting of operational and reputational risk data to the Risk Management Committee

8. Management of reputational risk

Taking into account that each process /aspect of the company's activity may influence the reputation, the management of reputational risk takes into consideration the following:

- each process of the company's operations;
- relationships with clients, especially in sensitive areas (confidentiality of information, observation of contracts, clients' right to information, crisis management situations, negative publicity, ways of solving / reduce customers complaints, etc);
- relationship with shareholders, other counterparties, investors, employees or regulatory authorities ("stakeholders");

Each department is responsible for every event / situation / incident that might occur as a reputational risk in its area of expertise. In such cases, it proceeds to prompt and complete information of the direct coordinator/hierarchical superior, Identity & Communications and reputational risk function as well as any situations or incidents that could negatively affect the company's reputation.

During 2021, no activity/ situation that might have had an impact on the UniCredit Leasing's reputation occurred, therefore no specific measures needed to be taken.

The reputational risk monitoring activities are performed by:

- Daily assessment of written articles and news which might represent a potential reputational risk for the company. For articles which might present a potential reputational risk an assessment is performed and set up, together with designated departments and corporate bodies, the communication strategy for each case;
- Monitoring of the IT system and establishment of clear and restrictive procedures and rules regarding the ways to use e-mails when communicating with clients and in external communication;
- The daily monitoring of all media (written, audio-visual and online press) related to - a list of key words related to leasing perimeter;
- Specific risk indicators.
- Appropriate application of KYC (know-your-customers) rules and regulations in force related to the prevention and combating of money laundering;
- Analysis of implementation of specific Group policies that assure a rigorous evaluation of the financing projects with potential reputational risk
- Proper training of the personnel regarding the KYC AML and FS;

9. Management of Business risk

Business risk is defined as adverse, unexpected changes in business volume and/or margins. It can lead to serious losses in earnings, thereby diminishing the market value of a company.

Business risk can result above all from:

- serious deterioration of the market environment;
- changes in the competitive situation or customer behavior.

Because of its nature, the business risk cannot be subject to mitigating actions, given that most of the key underlying drivers (e.g. regulatory changes, competitive changes, etc.) could suffer from external impacts with effects that could not be properly or entirely mitigated in advance by managerial actions. Although, the company is continuously trying to diversify the range of products offered, to monitor and reduce if the case, the limits on industries that are facing difficulties.

Following the global pandemic event, serious deterioration of the market environment and changes in customer behavior was predicted and registered.

The company has high focus in secure the business activities and the healthiness of the employees and customers. Crises and continuity management strategy was activated and major actions have been implemented:

- extended the smart working and work from home feasibilities and infrastructure (96% in Head Quarter and 84.6% in Network are working remote)
- redesign of internal flows& processes in order to support remote work
- enrolment of the essential staff in electronical signing flow and launch a dedicate electronical signing flow in relationship with customers and partners.
- creating a task force team to accommodate the changing in customer behavior, especially due to public moratoria.

10. Management of the risk associated to outsourced services

Regarding outsourced activities within UCL, organizational structures responsible with the coordination of outsourced activities continuously monitored the activities of the external providers and they have the obligation to prepare the annual monitoring reports that are presented to the Risk Management Committee within the first quarter of 2022.

During 2021 part of the outsourcing activities were revised in terms of documentation and contractual clauses as part of the renewal process. The documentation included risk assessment and cyber security assessment (where applicable) for respective outsourced activities.

ANNEX 3: UNICREDIT BANK SA XLS TEMPLATES

Covered area	Template id	Template Name	Link to
Scope of application	EU LI1	Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories	EU LI1'A1
	EU LI2	Main sources of differences between regulatory exposure amounts and carrying values in financial statements	EU LI2'A1
	EU LI3	Outline of the differences in the scopes of consolidation (entity by entity)	EU LI3'A1
Regulatory capital		Composition of regulatory capital-Own Funds	Own funds structure'A1
		Reconciliation of regulatory capital to Financial Statements	Reconciliation Own Funds'A1
		Main features of regulatory capital instruments	Cap. Instr. - Characteristics'A1
		Features of tier 2 subordinated capital instruments	Terms and conditions'A1
	KM1	Key metrics (at consolidated group level)	KM1'A1
Capital requirements	EU OV1	Overview of RWAs	EU OV1'A1
	EU CR8	RWA flow statements of credit risk exposures under the IRB approach	EU CR8'A1
	EU CR10	IRB (specialized lending and equities)	EU CR 10'A1
	EU CCR7	RWA flow statements of CCR exposures under the IMM	EU CCR7'A1
Counterparty credit risk	EU CCR5-A	Impact of netting and collateral held on exposure values	EU CCR5-A'A1
	EU CCR5-B	Composition of collateral for exposures to CCR	EU CCR5-B'A1
	EU CCR1	Analysis of CCR exposure by approach	EU CCR1'A1
	EU CCR2	CVA capital charge	EU CCR2'A1
	EU CCR3	Standardized approach – CCR exposures by regulatory portfolio and risk	EU CCR3'A1
Capital buffers		Capital buffers	Capital buffers'A1
Credit risk adjustments	EU CR1-A	Credit quality of exposures by exposure class and instrument	EU CR1-A'A1
	EU CR2-A	Changes in the stock of general and specific credit risk adjustments	EU CR2-A'A1
	CQ1	Credit quality of forborne exposures	EU CQ1'A1
	CQ2	Quality of forbearance	EU CQ2'A1
	CQ3	Credit quality of performing and non-performing exposures by past due days	EU CQ3'A1
	CQ4	Performing and non-performing exposures and related provisions	EU CQ4'A1
	CQ5	Quality of non-performing exposures by geography	EU CQ5'A1
	CQ6	Credit quality of loans and advances by industry	EU CQ6'A1
	CQ7	Collateral valuation - loans and advances	EU CQ7'A1
	CQ8	Changes in the stock of non-performing loans and advances	EU CQ8'A1
Asset encumbrance	A	Assets	Template A
	B	Guarantees received	Template B
	C	Encumbered assets/collateral received and associated liabilities	Template C
Remuneration		Information about the remuneration for the Bank's staff	Remuneration 1'A1
		Information related to remuneration of Identified Staff	Remuneration 2'A1
Leverage	LRSum	Summary comparison of accounting assets vs leverage ratio exposure measure	LRSum'A1
	LRCom	Leverage ratio common disclosure template	LRcom'A1
	LR SPL	Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	LR SPL'A1

Disclosure Report 2021

Covered area	Template id	Template Name	Link to
IRB Approach to credit risk	EU CR9	IRB approach – Back-testing of PD per exposure class	EU CR9!A1
	EU CR6	IRB approach – Credit risk exposures by exposure class and PD range	EU CR6!A1
	EU CCR4	IRB approach – CCR exposures by portfolio and PD scale	EU CCR4!A1
Credit risk mitigation techniques	EU CR3	CRM techniques – Overview	EU CR3!A1
	EU CR4	Standardized approach – Credit risk exposure and CRM effects	EU CR4!A1
Liquidity	LIQ1	Liquidity Coverage Ratio (LCR)	LIQ1!A1
	LIQ2	Net Stable Funding Ratio (NSFR)	LIQ2!A1
Prudent valuation adjustments	PV1	Prudent valuation adjustments	PV1!A1
Interest rate risk in the banking book	IRRBB1	Quantitative information on IRRBB	IRRBB1!A1
Market risk	EU MR1	Market risk under the standardized approach	EU MR1!A1
Operational risk		Operational Risk	Operational risk!A1
Other disclosure requirements		Disclosure requirements according to article 16 of National Bank of Romania Regulation no.5/2013 regarding prudential requirements for credit institutions.	Art 16 Reg BNR 5_2013!A1
CRM Techniques (art 453 f si g)	CRM-SA	Credit risk mitigation techniques: standardised approach	CRM-SA!A1
	CRM-IRB	Risk mitigation techniques - IRB Approach	CRM-IRB!A1
Guarantees and collaterals		Distribution of guarantees on credit exposures to banks and customers	Guarantees RON!A1
		Distribution of collaterals on credit exposures to banks and customers	Collaterals RON!A1
COVID-19 templates	Template 1 Covid	Template 1: Information on loans and advances subject to legislative and non-legislative moratoria	Template 1 Covid
	Template 2 Covid	Template 2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria	Template 2 Covid
	Template 3 Covid	Template 3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis	Template 3 Covid

Declaration of the Management Body of UniCredit Bank

related to

adequacy of risk management system

dated on 26.04.2022

With respect to the requirements of National Bank of Romania Regulation no. 5/20.12.2013 on prudential requirements for credit institutions and, in particular, to the requirements stipulated in Article 435 letter e) of Regulation no. 575/2013 of the European Parliament and of the Council dated 26 June 2013 on prudential requirements for credit institutions and investment firms, by this statement, UniCredit Bank's Management Body guarantees that the existing risk management systems are adequate, given the risk profile and strategy of the institution.

Risk management framework is one of the core components of the Bank's business management, being adapted to the structure and activity of the institution, to the nature and complexity of the risks inherent to the business model. It assures effective and prudent management of the Bank's activity, including the separation of responsibilities within the organization, prevention of conflicts of interest and, at the same time, the fulfillment of strategic risk objectives and of the targeted risk profile of the Bank.

Catalin Rasvan Radu
Executive President

Andrei Florin Bratu
Executive Vice-President

Declaration of the Management Body of the credit institution UniCredit Bank

on 2021 year's overall risk profile of the Bank,

according to the requirements stipulated in Article 435 letter f) of Regulation no. 575/2013 of the European Parliament and of the Council dated 26 June 2013

Developing a strong risk management culture is one of the main strategic objectives of UniCredit Bank. Risk management culture is promoted within departments directly responsible with risk management, but also within operational structures and to each employee of the institution.

Risk management includes determining, for overall performed activity and for each significant activity, the risk tolerance, while ensuring business continuity on sound and prudent basis. The set-up of targeted risk profile is done on an yearly basis, by considering market and macroeconomic conditions, past performance (historical) and UniCredit Bank' strategy in the immediately timeframe following (12 months). In 2021, a moderate risk profile was assumed in UniCredit Bank.

The Risk Management function also has responsibilities with regard to monitoring and approval of internal rating systems and risk assessment models, and risk analysis for new products exceptional transactions and transactions with affiliated parties.

Risk Management function has an important role within the Bank, ensuring the existence of effective risk management processes, being directly involved in:

- Defining and revision of strategies and in the decisional process;
- Analysis of transactions with affiliated parties;
- Identification of risks arising for legal structure complexity;
- Assessment of significant changes.

In order to meet the strategic objectives regarding the Bank's risk appetite, its limits have been translated into operative limits regarding general and specific significant risks management related indicators, as well regarding limits on the distribution of the loan portfolio by zones/ geographical areas, sectors of activity, counterparty categories, type of products, residence, country and currency.

These general and specific indicators have been periodically monitored during 2021 - year, the bank fitting in the assumed risk profile.

For example, we present the following key indicators on consolidated level as of 31.12.2021:

Capital Adequacy (Regulation no. 575/2013 of the European Parliament and of the Council dated 26 June 2013):

- | | |
|---|--------|
| - Core Tier 1 ratio (Tier1 Capital/ Risk Weighted Assets) | 18.02% |
| - Total capital ratio (Own funds/ Risk Weighted Assets) | 21.00% |
| - Leverage ratio | 9.02% |

Profitability & Risk

- | | |
|--|-------|
| - Net Operating Profit/ Risk Weighted Assets | 3.62% |
|--|-------|

Financing & Liquidity

- Liquidity Coverage Ratio	156.60%
- Net Stable Funding Ratio	159.38%

Catalin Rasvan Radu
Executive President

Feza Tan
First Executive Vice-President

Andrei Florin Bratu
Executive Vice-President