



Bigbank | Pillar 3 Report 2024



About the report

The report provides additional information on Bigbank Group's (the Group) risk and capital management according to the disclosure requirements as provided in Part Eight of the Regulation (EU) 575/2013 on prudential requirements for credit institutions and investment firms (Capital Requirements Regulation) and Directive (EU) 2013/36 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms (Capital Requirements Directive), as amended by subsequent Regulations and Directives. The Group is subject to the disclosure requirements laid down in Article 433c of the Capital Requirements Regulation.

Detailed information on the risk management strategies and processes is presented in the consolidated Bigbank AS Annual Report 2024 (Annual report). The information provided in the risk and capital management report (Pillar 3) complements the information presented in the Annual report and it is unaudited.

The information is presented as at the reporting date, which is 31 December 2024.

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RISK REPORT

Bigbank AS specializes in issuing loans and taking deposits. Historically, the bank has focused on unsecured consumer loans, but in recent years the main growth has been in secured housing loans and corporate loans. The Bank has two business lines: retail and corporate banking. The Bank mainly operates through digital channels. Bigbank has branches in Latvia, Lithuania, Finland, Sweden, and Bulgaria, which all offer similar consumer lending services. The management board of Bigbank AS decided to suspend issuing new loans in the Swedish branch from September 2022 but servicing the existing loan portfolio continues. In addition, all branches offer deposit services. Corporate loans and deposits are available in Estonia, Latvia and Lithuania. Bigbank also provides cross-border deposit services in Germany, Netherlands, and Austria from Estonia. A detailed description of the Group and its operations is given in the Annual report.

Effective risk and capital management is an essential component of the Group's management. It has a crucial impact on the long-term results and sustainability of the business model. Based on its business model, the Group has established risk appetite and target risk profiles for all identified material risks together with processes and measures for assessing and managing the actual risk profile in relation to risk appetite. The risk appetite is the level of aggregated risks that the Group is willing to take according to its business model and within risk tolerance limits, in order to achieve its strategic goals. The target risk profile is based on the defined risk appetite. Bigbank carries out ongoing monitoring and reporting of its risk exposures against the risk limits to ensure that its risk-taking activities remain within the risk appetite. The actual risk profile is reviewed by the Management Board at least quarterly and quarterly summary is presented also to the Supervisory Board. An overview of all material risks is presented in the following table.

Riski type	Risk appetite	Risk strategy in brief
Credit risk	Moderate	<p>The credit risk arises from the Group's direct lending activities and investment activities, where the counterparties have repayment or other obligations to the Group. The Group distinguishes credit risk arising from the loan portfolio (including assets reported outside the statement of financial position), money market operations and the bond portfolio.</p> <p>As sub-risks of credit risk, the Group has defined default risk, exposure risk, concentration risk and loan recovery and collateral risk.</p> <p>The overall appetite for credit risk is moderate, although it may vary by product and/or country, ranging from low to above average, based on the Bank's strategic plans and objectives. The Group consciously assumes a higher credit risk in the consumer loan portfolio, also issuing unsecured loans.</p> <p>In order to mitigate the risks, the Group focuses on a well-diversified consumer loan portfolio, avoiding issuing a significant number of unsecured loans to a single client.</p> <p>In the housing loan segment, the Group accepts clients with moderate risk, whose solvency is suitable based on a thorough loan analysis and the loan is sufficiently secured by real estate collateral. In the business loan segment, the Group accepts clients with moderate credit risk, and loans are predominantly secured by real estate. In terms of business loans, the Group is prepared to take on a higher concentration risk and to issue a significant loan amount to one client or group of clients if the loan is secured by strong guarantees. The Group also accepts higher industry concentration risk in its business loan portfolio, while focusing on industries where it has sufficient competence and expertise.</p>

Risk type	Risk appetite	Risk strategy in brief
		<p>The Group is not entirely dependent on external debt collection services or the sale of claims but manages the company's internal debt collection units in the countries where loans are issued. The sale of claims is a normal part of the recovery process and is used when the sale is economically justified and supports the management of NPLs.</p>
Liquidity and funding risk	Moderate	<p>The Group maintains a conservative liquidity risk profile and sufficient liquidity reserves. Maintaining strong liquidity position is one of the main priorities for the Group. The Group shall ensure its ability to meet its obligations on time and in full and to cope with a potential liquidity crisis for as long as possible. One of the main objectives of liquidity management is to maximise profitability and support the Group's core business through proactive and well-functioning asset and liability management, ensuring sufficient liquidity reserves and maintaining access to funding. Profit expectations must not override liquidity requirements. Liquidity management contributes to the Group's profitability, but a clear distinction must be made between liquidity needs and profit targets.</p> <p>The Group's financing strategy is to ensure adequate and stable financing of its activities from its own resources and external financing. The Group avoids significant funding risk and balances the risk profile of funding. The main source of funding is retail deposits. Strategic management and the limitation of the structure of assets and liabilities are an integral part of strategic planning. The Group's strategic plans correspond to the actual financing structure and economic forecasts. The funding plan is developed as part of the annual budgeting process. The asset structure and its maturities correspond to the funding structure. The funding programming shall consider the forecast of asset quality and quality. The financing of the (net) loan portfolio shall not rely excessively on short-term wholesale funding. The group's financing from external sources shall be balanced with own capital. Diversification is the key part of the Group's overall funding and liquidity management strategy and concentration of funding and funding counterparties shall be avoided. The origin of the Group's funding sources shall be countries of the European Union. The group shall have a contingency plan in place which defines the actions to be taken should the Group encounter a liquidity shortfall in stressed situation.</p> <p>The Group's risk appetite for liquidity risk is low and for funding risk is moderate.</p>
Market risk	Moderate	<p>The Group avoids significant market risks and maintains rather conservative market risk profile. The Group does not take any speculative trading positions nor does provide customer-focused trading activities. The market risk strategy is rather conservative and the risk appetite for market risk is moderate. Within the market risk, the objective of currency risk management is to minimise net open currency positions so that the Group is not too sensitive to exchange rate movements and the potential risk to profits is minimised. Activities that are necessary to support the Group's core business and to hold liquid</p>

Risk type	Risk appetite	Risk strategy in brief
		<p>assets are preferred. The risk appetite for currency risk is low.</p> <p>The sources of interest rate risk arising from the non-trading activities (IRRBB) are negative changes in loan and/or deposit interest rates. The primary objective is to manage and mitigate the impact of interest rate changes on the Group's net interest income (NII) and economic value (EV), ensuring stability and supporting the Group's long-term profitability and strategic growth goals. This includes diversifying the maturity profiles and revaluation characteristics of both assets and liabilities to minimise risk. In its business model, the Group accepts the financing of assets with a relatively long revaluation period with liabilities with a relatively short revaluation period, where the risk of reversal of the yield curve is covered by higher interest income earned on such assets (e.g. financing fixed rate consumer loans with short-term deposits). For longer-term loan products with lower commercial margins (business and home loans), the strategy is to use floating interest rates to hedge the risk. IRRBB risk appetite is moderate.</p> <p>The main objective of holding investment properties is to support the Group's core business, diversify revenue sources and support the achievement of the Group's profit target. Risk and return considerations are taken into account. The risk appetite for real estate risk is moderate.</p>
Operational risk	Low	<p>Group keeps a minimal reasonable operational risk level. minimizing potential losses and considering its strategic objectives and the principle of economic efficiency. The Group's risk appetite for operational risk is low. Operational risk consists of different subcategories, such as legal risk, compliance risk, money laundering and terrorist financing risk (part of compliance risk), information and communication technology (ICT) and security risk.</p> <p>The legal risk management strategy is to minimize exposure to legal disputes by ensuring that the Group's operations and obligations arising from contractual relations comply with legal and ethical standards. The risk appetite for legal risk is low.</p> <p>The Group's compliance risk strategy is to ensure that its operations comply with applicable laws and regulations. Among other things, the Group undertakes appropriate steps to prevent internal and external fraud and discipline violations. The risk appetite for compliance risk is low.</p> <p>Money laundering and terrorist financing risk (incl. sanction risk) as part of the compliance risk is defined as the risk that the Group will be used for money laundering and terrorist financing due to weaknesses and mismatches in internal processes. The anti-money laundering and countering the financing of terrorism (AML/CFT) strategy is to avoid risk-taking that cannot be managed. The Group mainly offers simple retail and commercial banking products with a low risk of money laundering and terrorist financing to low-risk private and legal clients resident in the home market, taking into account country-specific</p>

Risk type	Risk appetite	Risk strategy in brief
		<p>risks. Greater risk-taking must be covered by an adequate organisational and IT solution. The risk appetite for money laundering and terrorist financing is low.</p> <p>Information and Communication Technology (ICT) and security risk refers to the risk of damage resulting from a breach of confidentiality, disruption of systems and data integrity, incompatibility or unavailability of systems and data, or failure to modify information technology within a reasonable timeframe and at a reasonable cost in the event of a change in environmental or business requirements (i.e. flexibility). This includes security risks arising from inadequate or failed internal processes or external events, including cyberattacks or insufficient physical security. Effective management and control of ICT and security risks is a key element of the Group's risk management and control framework. The risk management strategy shall be based on an overall operational risk strategy, keep ICT and security risk to a minimum at a reasonable level, minimising potential losses and taking into account strategic objectives and. ICT and security risk appetite is low.</p>
Strategic risk	Moderate	The Group controls and reduces risk by implementing an adequate and suitable strategy. that corresponds to the current economic environment and is based on a comprehensive planning process. The Group responds to changes in an adequate and timely manner. The Group's strategic and business risk appetite is moderate.
Reputational risk	Low	The Group avoids reputational risks and situations that could potentially lead to a negative impact on the reputation and an accompanying drop in revenue, or loss of confidence. Management of reputational risk is based on the principle that reputation is an important asset. The Group's reputational risk appetite is low.

In addition to the material risks listed in the table, environmental, social and governance risks (ESG risk) have an impact on the Group's activities. ESG risk is not considered a stand-alone risk as it materialises through traditional categories of financial and non-financial risks (e.g. credit risk, market risk, operational and reputational risks, liquidity and funding risks). Where appropriate, ESG-related considerations shall be included in those aspects of the risk management framework that directly address a specific category of material risk and shall be addressed in the relevant risk policies. Therefore, risk appetite has not been assigned to ESG risk, but its impact must be considered as a risk factor in establishing and addressing the risk appetite for significant risks. The board's role is to ensure that ESG-related risks are incorporated into the overall business strategy, business processes, and risk management processes, reported and regulatory requirements met. All managers of area, branch/subsidiary are responsible for taking ESG risks into account in their area of responsibility/country.

A more detailed description of the risk management framework and material risks is given in Note 5 (Risk and capital management).

In accordance with its business model, the Group's risk profile is dominated by credit risk arising from the loan portfolio, which is the most significant driver of the amount of risk weighted assets. 89.7% of the Group's total risk-weighted exposure amount is related to credit risk. In the consumer lending segment, the Group accepts knowingly higher credit risk by granting unsecured loans. In the housing loan segment the Group accepts only customers whose payment capacity is acceptable based on thorough loan analysis and whose loan is fully secured by real-estate collateral. In the business loan segment the Group accepts customers with moderate credit risk and loans are mostly secured by real-estate collaterals. The credit risk appetite is defined in terms of credit risk concentration (limits for specific client groups, maximum loan size and geographical location), credit quality (expected

credit loss) and the ratio of non-performing loans, in line with regulatory definitions and applicable limits. As of 31 December 2024, the actual credit risk level exceeded the target level being above average.

Operational risk is present across all the Group's activities. The operational risk exposure represents 9.3% of the Group's total risk weighted exposure amount. During 2024, total actual losses due to operational risk amounted to 0.6 million euros, while the capital requirement amount attributable to operational risk was 13.6 million euros as at 31 December 2024. Around half of the operational risk losses were related to external fraud cases, most of which consisted in using a stolen identity while applying for consumer loans or hire-purchase agreements. The Group's strategy is to keep a minimal reasonable operational risk level and to minimise the level of potential losses, considering strategic objectives and the principle of economic efficiency. Risk tolerance is expressed in terms of total actual and potential losses resulting from the operational risk events. The Group's compliance risk strategy is to ensure that its operations are compliant with the respective laws and regulations. The Group's operational risk appetite is low and corresponds to the actual risk profile as at 31 December 2024. The levels of compliance risk, money laundering and terrorist financing risk, and the risk of breach of sanctions were assessed separately. The target risk level of those risks is low and the actual risk levels corresponded to the target levels at 31 December 2024. The Group's risks of money laundering and terrorist financing and breach of sanctions are limited due to a limited and low-risk product portfolio and the fact that services are mainly offered to customers who are residents of the country of the respective business unit.

Market risks predominantly arise from the Group's core business activities and taking market risk is not the Group's main activity. The Group does not take speculative trading positions nor provide customer-focused trading activities. The market risk strategy is to avoid significant market risks and maintain a rather conservative market risk profile. The actual market risk level was moderate at 31 December 2024 and met the target level. The Group treats separately foreign currency risk, interest rate risk in the banking book (IRRBB) and real-estate price risk. Market risk contributes 1.0% to the Group's total risk-weighted exposure amount. Risks related to IRRBB, and real-estate price are covered separately with Pillar 2 capital requirements which are calculated within the ICAAP and established by the FSA as a SREP capital requirement. Market risk is monitored regularly and controlled by setting limits on bond portfolio risk exposures, net open foreign currency risk exposures, interest rate sensitivity of economic value of equity and net interest income.

The primary risk not mitigated with capital and hence not measured in total risk-weighted exposure terms is liquidity risk. Liquidity risk is a material risk for the Group. The liquidity risk appetite is low, and accordingly the Group maintains a conservative liquidity risk profile and sufficient liquidity reserves. Maintaining a strong liquidity position is one of the main priorities of the Group. Liquidity risk management is based on conservative assumptions. The actual liquidity level corresponded to the target level at 31 December 2024. Liquidity risk limits and key risk indicators are set to ensure that the liquidity risk profile of the Group remains within the liquidity risk appetite. At 31 December 2024, the Group had a liquidity buffer in size of 16.7% from the total assets. The Group assesses funding risk separately. The funding risk appetite is moderate – significant funding risks are avoided, and a well-balanced funding risk profile is maintained. The actual risk level corresponded to the target level at the year-end.

Other material risks for Bigbank are reputational, business, and strategic risks. These risks are an essential part of the business model and addressed as part of the strategic and operational planning. The Group's strategy on reputational risk management is to avoid reputational risks and to avoid situations that could potentially lead to a negative impact on reputation and to an accompanying drop in revenue or loss of confidence. The Group's reputational risk appetite is low, and the actual risk profile was also low as of 31 December 2024. The Group's strategy on business and strategic risk management is to control and reduce risk by implementing an adequate and suitable strategy, corresponding to the current economic environment, and based on comprehensive planning process, as well as to respond to changes in an adequate and timely manner. The main risk is related to the rapid growth of the Group. The Group's strategic and business risk appetite is moderate, and the actual level was assessed as moderate at 31 December 2024. Reputational, business, and strategic risks are covered with Pillar 2 capital requirements which are calculated within the ICAAP.

Information on intra-Group transactions and transactions with related parties, which may have a material impact on the risk profile of the Group are disclosed in the Note 35 (Transactions with related parties). As at the reporting date the Bank's loan claims to subsidiaries were 30.7 million euros and loan liabilities to subsidiaries 1.8 million euros.

The key metrics and ratios as well as the related input components are disclosed in the following table according to the requirements of the Capital Requirements Regulation. These metrics form part of holistic risk management across individual risk types in addition to Bigbank's internally used risk metrics.

Table 1. EU KM1 – The key metrics

in million EUR		31.12.2024	30.06.2024	31.12.2023
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	241.2	227.2	217.7
2	Tier 1 capital	265.9	248.4	233.9
3	Total capital	332.9	313.9	292.9
Risk-weighted exposure amounts				
4	Total risk exposure amount	1,831.9	1,637.2	1,494.3
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	13.17%	13.88%	14.57%
6	Tier 1 ratio (%)	14.52%	15.17%	15.65%
7	Total capital ratio (%)	18.17%	19.17%	19.60%
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 (%)	3.20%	3.20%	4.49%
EU 7b	of which: to be made up of CET1 capital (percentage points)	180	180	252
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	240	240	337
EU 7d	Total SREP own funds requirements (%)	11.20%	11.20%	12.49%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	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%	0%	0%
9	Institution specific countercyclical capital buffer (%)	1.09%	1.01%	1.03%
EU 9a	Systemic risk buffer (%)	0.08%	0.07%	0.05%
10	Global Systemically Important Institution buffer (%)	0%	0%	0%
EU 10a	Other Systemically Important Institution buffer (%)	0%	0%	0%
11	Combined buffer requirement (%)	3.67%	3.58%	3.58%
EU 11a	Overall capital requirements (%)	14.87%	14.78%	16.07%
12	CET1 available after meeting the total SREP own funds requirements (%)	6.12%	6.77%	6.28%
Leverage ratio				
13	Total exposure measure	2,776.6	2,631.2	2,289.1
14	Leverage ratio (%)	9.58%	9.44%	10.22%
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%	0%	0%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0%	0%	0%
EU 14c	Total SREP leverage ratio requirements (%)	0%	0%	0%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)				
EU 14d	Leverage ratio buffer requirement (%)	0%	0%	0%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%
Liquidity Coverage Ratio				
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	523.3	494.3	317.3

in million EUR		31.12.2024	30.06.2024	31.12.2023
EU 16a	Cash outflows - Total weighted value	187.8	157.0	124.7
EU 16b	Cash inflows - Total weighted value	50.7	46.7	45.5
16	Total net cash outflows (adjusted value)	137.1	110.3	79.2
17	Liquidity coverage ratio (%)*	400.24%	450.72%	403.84%
Net Stable Funding Ratio				
18	Total available stable funding	2,578.05	2,440.30	2,109.7
19	Total required stable funding	1,765.38	1,535.10	1,348.1
20	NSFR ratio (%)	146.03%	158.96%	158.50%

*LCR (%) is calculated based on 12 months weighted average value

Common Equity Tier 1 (CET1) ratio decreased from 14.57% at the end of 2023 to 13.17% at end of 2024, total capital ratio decreased from 19.60% to 18.17% respectively. Tier 1 ratio decreased during a year by 1.13% (from 15.65% at the end of 2023 to 14.52% at the end of 2024). All ratios exceeded the regulatory requirements.

Total risk exposure amount (TREA) increased from 1,494.3 million euros at the end of 2023 to 1,831.9 million euros at the end of 2024 (22.6%).

The leverage ratio fell to 9.58% at the end of 2024 from 10.22% at the end of 2023. The fall was driven primarily by an increase of assets that raised the leverage ratio exposure.

Long-term liquidity risk ratio NSFR has stayed on a stable level throughout 2024. During 2024 the level of average LCR decreased in comparison to the average level in year 2023. The decrease was mainly due to higher outflows related to the increased volume of non-maturity deposits.

Bigbank AS has disclosed this information in accordance with the requirements under Part Eight of the Capital Requirements Regulation. The internal procedure "Principles of Disclosing Information Related to Risk Management (Pillar 3)" establishes the key internal control elements to ensure compliance with the disclosure requirements. The process, including the related principles, roles and responsibilities is documented, reviewed, and regularly updated. Internal controls are implemented in the regulatory reporting process. The Pillar 3 report is signed off by the members of the Management Board.

The Management Board of Bigbank AS approves the adequacy of the risk management arrangements and risk management systems put in place with regard to the Group's profile and strategy.

Martin Länts

Mart Veskimägi

Ingo Pöder

Argo Kiltsmann

Ken Kanarik

signed digitally

OWN FUNDS

The information regarding own funds is disclosed according to Article 437 of the Capital Requirements Regulation.

Table 2. EU CC1 - Composition of regulatory own funds

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
in million EUR		
Common Equity Tier 1 (CET1) capital: instruments and reserves		
1 Capital instruments and the related share premium accounts	8.0	17
of which: share capital	8.0	17
2 Retained earnings	226.2	20
3 Accumulated other comprehensive income (and other reserves)	3.3	18,19
EU-3a Funds for general banking risk	-	
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	24.3	
6 Common Equity Tier 1 (CET1) capital before regulatory adjustments	261.8	
Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7 Additional value adjustments (negative amount)	-0.1	
8 Intangible assets (net of related tax liability) (negative amount)	-19.5	
12 Negative amounts resulting from the calculation of expected loss amounts	-1.0	
28 Total regulatory adjustments to Common Equity Tier 1 (CET1)	-20.5	
29 Common Equity Tier 1 (CET1) capital	241.2	
Additional Tier 1 (AT1) capital: instruments		
30 Capital instruments and the related share premium accounts	24.7	
31 of which: classified as equity under applicable accounting standards	24.7	
36 Additional Tier 1 (AT1) capital before regulatory adjustments	24.7	
Additional Tier 1 (AT1) capital: regulatory adjustments		
44 Additional Tier 1 (AT1) capital	24.7	
45 Tier 1 capital (T1 = CET1 + AT1)	265.9	
Tier 2 (T2) capital: instruments		
46 Capital instruments and the related share premium accounts	67.0	
51 Tier 2 (T2) capital before regulatory adjustments	67.0	

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
in million EUR		
Tier 2 (T2) capital: regulatory adjustments		
58 Tier 2 (T2) capital	67.0	
59 Total capital (TC = T1 + T2)	332.9	
60 Total Risk exposure amount	1.831.9	
Capital ratios and requirements including buffers		
61 Common Equity Tier 1 capital	13.17%	
62 Tier 1 capital	14.52%	
63 Total capital	18.17%	
64 Institution CET1 overall capital requirements	9.97%	
65 of which: capital conservation buffer requirement	2.50%	
66 of which: countercyclical capital buffer requirement	1.09%	
67 of which: systemic risk buffer requirement	0.08%	
EU-67a of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	-	
EU-67b of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.80%	
68 Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	6.12%	

Own funds are calculated in accordance with the Capital Requirements Regulation. On the row 2 (Retained earnings) undistributed profit from the previous years is included. On the row EU-5a (Independently reviewed interim profits net of any foreseeable charge or dividend) include the audited net profit of 12 months less expected dividends in amount of 8 million euros. Profit for the reporting period may only be included in Common Equity Tier 1 capital after permission from the financial supervisory authority. In Table 3. EU CC2 profit of the current year includes profit of the full year with no dividends deducted.

SCOPE OF APPLICATION

The information is disclosed according to Article 436 of the Capital Requirements Regulation.

Table 3. EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Viide reale tabelis EU CC1
in million EUR		31.12.2024	31.12.2024	
1	Cash balances at central banks	423.2	423.2	
2	Due from other banks	25.4	24.2	
3	Debt securities at fair value through other comprehensive income	22.3	22.3	
4	Loans to customers	2,196.5	2,209.7	
5	Investments in subsidiaries	-	36.5	
6	Tangible assets	8.9	8.9	
7	Investment properties	66.4	9.8	
8	Immaterial assets	25.2	25.2	8
9	Tax assets	0.4	0.4	
10	Other assets	9.9	9.4	
11	Assets classified as held for sale	0.2	-	
Total assets		2,778.4	2,769.6	
12	Deposits from banks	8.4	-	
13	Deposits from customers	2,393.3	2,393.3	
14	Subordinated bonds	91.7	91.7	44.46
15	Tax liabilities	2.9	2.9	
16	Other liabilities	12.3	11.9	
Total liabilities		2,508.6	2,499.8	
17	Paid-in share capital	8.0	8.0	1
18	Capital reserve	0.8	0.8	3
19	Other reserves (accumulated other comprehensive income)	2.5	2.5	3
19a	Exchange differences on translating foreign operations	1.2	1.2	
19b	Revaluation of assets	1.7	1.7	
19c	Net change in fair value of debt instruments at fair value through other comprehensive income	-0.4	-0.4	
20	Retained earnings	258.5	258.5	
20a	Profit for the year	32.3	32.3	EU-5a
20b	Prior periods profit	226.2	226.2	2
Shareholders' Equity		269.8	269.8	
Total liabilities and shareholder's equity		2,778.4	2,769.6	

Table 4. EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories

		a	b	c	d	e	f	g
		Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk frame- work	Not subject to own funds requirements or subject to deduction from own funds
in million EUR								
Breakdown by asset classes according to the balance sheet in the published financial statements								
1	Cash balances at central banks	423.2	423.2	495.1	-	-	-	-
2	Due from other banks	25.4	24.2	19.6	-	-	-	-
3	Debt securities at fair value through other comprehensive income	22.3	22.3	22.2	-	-	-	0.1
4	Loans to customers	2,196.5	2,209.7	2,209.3	-	-	-	0.4
5	Investments in subsidiaries	-	36.5	20.5	-	-	-	-
6	Material assets	8.9	8.9	9.4	-	-	-	-
7	Investment properties	66.4	9.8	9.8	-	-	-	-
8	Immaterial assets	25.2	25.2	3.4	-	-	-	21.8
9	Tax assets	0.4	0.4	0.4				
10	Other assets	9.9	9.4	9.4				
11	Assets classified as held for sale	0.2	-		-	-	-	-
Total assets		2,778.4	2,769.6	2,799.1	-	-	-	22.3
Breakdown by liability classes according to the balance sheet in the published financial statements								
12	Deposits from banks	8.4	-	-	-	-	-	-
13	Deposits from customers	2,393.3	2,393.3	-	-	-	-	-
14	Subordinated bonds	91.7	91.7	-	-	-	-	-
15	Tax liabilities	2.9	2.9					
16	Other liabilities	12.3	11.9	-	-	-	-	-
Total liabilities		2,508.6	2,499.8	-	-	-	-	

Table 5. EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements

		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
in million EUR						
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	2,769.6	2,769.6	-	-	-
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	2,499.8	-	-	-	-
3	Total net amount under the scope of prudential consolidation	269.8	-	-	-	-
4	Off-balance-sheet amounts	173.8	173.8	-	-	-
5	Differences in valuations	-0.1	-	-	-	-
6	Differences due to different netting rules, other than those already included in row 2	-	-	-	-	-
7	Differences due to consideration of provisions	-	-	-	-	-
8	Differences due to the use of credit risk mitigation techniques (CRMs)	-	-	-	-	-
9	Differences due to credit conversion factors	-159.2	-159.2	-	-	-
10	Differences due to Securitisation with risk transfer			-	-	-
11	Other differences	-20.5	-20.5	-	-	-
12	Exposure amounts considered for regulatory purposes	2,763.6	-	-	-	-

Table 6. EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)

Name of the entity	Method of accounting consolidation	Method of prudential consolidation				Deducted	Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted		
Bigbank AS							Credit institution
Balti Võlgade Sissenõudmise Keskus OÜ	Full consolidation	X					Administrative and support service activities
AS Baltijas Izaugsmes Grupa	Full consolidation			X			Real estate activities
OÜ Rütli Majad	Full consolidation	X					Real estate activities
OÜ Rütli Property	Full consolidation			X			Agriculture, forestry and fishing
OÜ Papiniidu Property	Full consolidation			X			Real estate activities
OÜ Pärnu mnt 153 Property	Full consolidation			X			Real estate activities

Group consolidated in the prudential scope consists of the Estonian parent company, its foreign branches and subsidiaries in Estonia and Latvia. Subsidiary companies OÜ Rütli Property, OÜ Papiniidu Property, OÜ Pärnu mnt 153 Property and AS Baltijas Izaugsmes Grupa do not provide ancillary services according to the Credit Institutions Act and Capital Requirements Regulation and are therefore consolidated using the equity method according to the scope of prudential consolidation, i.e. not applying full consolidation according to IFRS accounting treatment. Companies consolidated under IFRS include all companies controlled by the parent company. The total difference between the Prudential scope of consolidation and consolidation according to IFRS accounting treatment is 8.8 million euros. For details, see Note 2 (Basis of preparation and statement of compliance) of the Annual report.

Table 7. EU PV1 - Prudent valuation adjustments (PVA)

in million EUR		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
Category level AVA		Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA			
1	Market price uncertainty	-0.1	-	-	-0.1	-	-	-0.1	-0.1	-	-0.1
3	Close-out cost	-	-	-	-	-	-	-	-	-	-
4	Concentrated positions	-	-	-	-	-	-	-	-	-	-
5	Early termination	-	-	-	-	-	-	-	-	-	-
6	Model risk	-	-	-	-	-	-	-	-	-	-
7	Operational risk	-	-	-	-	-	-	-	-	-	-
10	Future administrative costs	-	-	-	-	-	-	-	-	-	-
12	Total Additional Valuation Adjustments (AVAs)	-0.1	-	-	-0.1	-	-	-0.1	-0.1	-	-0.1

The group uses a simplified method for determining additional value adjustments in accordance with delegated regulation EU 2016/101.

Table 8. EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments

1	Issuer	Bigbank AS	Bigbank AS	Bigbank AS	Bigbank AS	Bigbank AS
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	EE3100016015	EE3300002526	EE3300002583	EE3300002690	EE3300003052
2a	Public or private placement	Private	Private	Private	Private	Public
3	Governing law(s) of the instrument	Estonian	Estonian	Estonian	Estonian/ Latvian/ Lithuanian	Estonian/ Latvian/ Lithuanian
3a	Contractual recognition of write down and conversion powers of resolution authorities	No	Yes	Yes	Yes	Yes
Regulatory treatment						
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2	Tier 2	Tier 2

5	Post-transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2	Tier 2	Tier 2
6	Eligible at solo/(sub-) consolidated/ solo& (sub)consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated
7	Instrument type (types to be specified by each jurisdiction)	Common shares	Tier 2 subordinated notes	Tier 2 subordinated notes	Tier 2 subordinated notes	Tier 2 subordinated notes
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	8 EUR	10 EUR	5 EUR	20 EUR	15,1 EUR
9	Nominal amount of instrument	100 EUR	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR
EU-9a	Issue price	Face value changed on 2011 from EEK 1,000 to EUR 100	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR
EU-9b	Redemption price	N/A	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR
10	Accounting classification	Shareholders' equity	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	22.09.1992	30.12.2021	16.05.2022	21.09.2022	16.02.2023
12	Perpetual or dated	Perpetual	Dated	Dated	Dated	Dated
13	Original maturity date	No maturity	30.12.2031	16.05.2032	21.09.2032	16.02.2033
14	Issuer call subject to prior supervisory approval	No	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	30.12.2026, redemption amount is the aggregate of the nominal value, accrued but unpaid interests, any other amount due and payable by the Issuer to the Investor	16.05.2027, redemption amount is the aggregate of the nominal value, accrued but unpaid interests, any other amount due and payable by the Issuer to the Investor	21.09.2027, redemption amount is the aggregate of the nominal value, accrued but unpaid interests, any other amount due and payable by the Issuer to the Investor	16.02.2028, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.
16	Subsequent call dates, if applicable	N/A	On each interest payment date after 30.12.2026	On each interest payment date after 16.05.2027	N/A	After 16.02.2028, 30 days' notice
Coupons / dividends						
17	Fixed or floating dividend/coupon	Floating	Fixed	Fixed	Fixed	Fixed
18	Coupon rate and any related index	N/A	6.5%	7.5%	8.0%	8.0%
19	Existence of a dividend stopper	N/A	N/A	N/A	N/A	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory

EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No
22	Noncumulative or cumulative	Cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	N/A	Non-convertible	Non-convertible	Non-convertible	Non-convertible
30	Write-down features	No	No	No	No	No
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	AT 1	All unsubordinated claims of creditors of the Issuer	All unsubordinated claims of creditors of the Issuer	All unsubordinated claims of creditors of the Issuer	All unsubordinated claims of creditors of the Issuer
36	Non-compliant transitioned features	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A	N/A	N/A	https://static.bigbank.eu/investor/assets/2022/09/Bigbank-AS-T2-Final-Terms-First-tranche.pdf	https://static.bigbank.eu/investor/assets/2023/01/Bigbank_T2_Final_Terms_Second_tranche_2023.pdf
1	Issuer	Bigbank AS	Bigbank AS	Bigbank AS	Bigbank AS	Bigbank AS
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	EE3300003151	EE3300003284	EE3300003581	EE3300003706	EE3300004340
2a	Public or private placement	Public	Private	Private	Private	Public
3	Governing law(s) of the instrument	Estonian	Estonian	Estonian	Estonian	Estonian/ Latvian/ Lithuanian
3a	Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes	Yes	Yes
Regulatory treatment						
4	Current treatment taking into account, where applicable, transitional CRR rules	Additional Tier 1	Additional Tier 1	Additional Tier 1	Tier 2	Tier 2
5	Post-transitional CRR rules	Additional Tier 1	Additional Tier 1	Additional Tier 1	Tier 2	Tier 2
6	Eligible at solo/(sub-) consolidated/solo& (sub)consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated

7	Instrument type (types to be specified by each jurisdiction)	Additional Tier 1 notes	Additional Tier 1 notes	Additional Tier 1 notes	Tier 2 subordinated notes	Tier 2 subordinated notes
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	7.7 EUR	3.4 EUR	5.1 EUR	5 EUR	7 EUR
9	Nominal amount of instrument	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR
EU-9a	Issue price	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR
EU-9b	Redemption price	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR	1,000 EUR
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	15.03.2023	31.05.2023	31.08.2023	30.11.2023	29.05.2024
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Dated	Dated
13	Original maturity date	Perpetual	Perpetual	Perpetual	30.11.2033	29.05.2034
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	15.03.2028, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.	31.05.2028, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.	31.08.2028, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.	30.11.2028, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.	29.05.2029, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.
16	Subsequent call dates, if applicable	After 15.03.2028, 30 days' notice	After 31.05.2028, 30 days' notice	After 31.08.2028, 30 days' notice	After 30.11.2028, 30 days' notice	After 29.05.2029, 30 days' notice
Coupons / dividends						
17	Fixed or floating dividend/coupon	Fixed	Fixed	Fixed	Fixed	Fixed
18	Coupon rate and any related index	10.5%	12.0%	12.0%	8.0%	7.0%
19	Existence of a dividend stopper					
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary	Partially discretionary	Partially discretionary	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Partially discretionary	Partially discretionary	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
30	Write-down features	No	No	No	No	No
35	Position in subordination hierarchy in liquidation (specify instrument	Tier 2	Tier 2	Tier 2	All unsubordinated claims of	All unsubordinated claims of

	type immediately senior to instrument)				creditors of the Issuer	creditors of the Issuer
36	Non-compliant transitioned features	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://static.bigbank.eu/investor/assets/2023/03/Terms-and-Conditions-of-Bigbank-AT1-Temporary-Write-Down-NotesFinal-Terms.pdf	https://static.bigbank.eu/investor/assets/2023/09/Terms-and-Conditions-of-Bigbank-AT1-Temporary-Write-Down-Notes-May-2023.pdf	https://static.bigbank.eu/investor/assets/2023/09/Terms-and-Conditions-of-Bigbank-AT1-Temporary-Write-Down-Notes-August-2023-2.pdf	https://static.bigbank.eu/investor/assets/2023/11/Bigbank-AS_T2-Final-Terms-First-tranche_11-2023_ENG.pdf	https://static.bigbank.eu/investor/assets/2024/05/Bigbank-AS-T2-Final-Terms-Second-tranche_ET.pdf

1	Issuer	Bigbank AS	Bigbank AS	Bigbank AS
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	EE3300004696	EE3300004977	EE3300005081
2a	Public or private placement	Public	Private	Private
3	Governing law(s) of the instrument	Estonian	Estonian/ Latvian/ Lithuanian	Estonian
3a	Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes

Regulatory treatment

4	Current treatment taking into account, where applicable, transitional CRR rules	Additional Tier 1	Tier 2	Additional Tier 1
5	Post-transitional CRR rules	Additional Tier 1	Tier 2	Additional Tier 1
6	Eligible at solo/(sub-) consolidated/ solo& (sub)consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated	Solo & (Sub-) consolidated
7	Instrument type (types to be specified by each jurisdiction)	Additional Tier 1 notes	Tier 2 subordinated notes	Additional Tier 1 notes
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	5 EUR	5 EUR	3.5 EUR
9	Nominal amount of instrument	1,000 EUR	1,000 EUR	1,000 EUR
EU-9a	Issue price	1,000 EUR	1,000 EUR	1,000 EUR
EU-9b	Redemption price	1,000 EUR	1,000 EUR	1,000 EUR
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	21.06.2024	23.10.2024	29.11.2024
12	Perpetual or dated	Perpetual	Dated	Perpetual
13	Original maturity date	Perpetual	23.10.2034	Perpetual

14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	21.06.2029, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.	23.10.2029, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.	29.11.2029, redemption amount is the aggregate of the nominal value, accrued but unpaid interests.
16	Subsequent call dates, if applicable	After 21.06.2029, 30 days' notice	After 23.10.2029, 30 days' notice	After 29.11.2029, 30 days' notice

Coupons / dividends

17	Fixed or floating dividend/coupon	Fixed	Fixed	Fixed
18	Coupon rate and any related index	10.5%	6.5%	9.0%
19	Existence of a dividend stopper			
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary	Partially discretionary	Partially discretionary
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Partially discretionary	Partially discretionary
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
30	Write-down features	No	No	No
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 2	All unsubordinated claims of creditors of the Issuer	Tier 2
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://static.bigbank.eu/investor/assets/2024/06/Final-Terms-of-Bigbank-AT1_June_2024.pdf	https://static.bigbank.eu/investor/assets/2024/10/Bigbank-AS-T2-Final-Terms-Third-tranche_EST.pdf	https://static.bigbank.eu/investor/assets/2024/11/Final-Terms-of-Bigbank-AT1-7-November-2024.pdf

LEVERAGE RATIO

The information on leverage ratio is disclosed according to Article 451 of the Capital Requirements Regulation.

Table 9. EU LR1 - LRSum - Summary reconciliation of accounting assets and leverage ratio exposures

in million EUR		Applicable amount
1	Total assets as per published financial statements	2,778.4
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-8.8
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	-
8	Adjustment for derivative financial instruments	-
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)	27.5
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-20.5
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	-
13	Total exposure measure	2,776.6

Table 10. EU LR2 - LRCom - Leverage ratio common disclosure

in million EUR		CRR leverage ratio exposures	
		31.12.2024	31.12.2023
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	2,769.6	2,281.8
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)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	-20.5	-22.2
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	2,749.1	2,259.6
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	173.8	134.9
20	(Adjustments for conversion to credit equivalent amounts)	-146.2	-105.3
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	Off-balance sheet exposures	27.5	29.6
Capital and total exposure measure			
23	Tier 1 capital	241.2	217.7
24	Total exposure measure	2,776.6	2,289.1
Leverage ratio			
25	Leverage ratio (%)	9.58%	10.22%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	9.58%	10.22%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	9.58%	10.22%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0%	0%
EU-26b	of which: to be made up of CET1 capital	0%	0%
27	Leverage ratio buffer requirement (%)	0%	0%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
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

Table 11. EU LR3 - LRSpl - Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

in million EUR		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures). of which:	2,769.6
EU-2	Trading book exposures	-
EU-3	Banking book exposures. of which:	2,769.6
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	456.0
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	-
EU-7	Institutions	28.9
EU-8	Secured by mortgages of immovable properties	1,189.4
EU-9	Retail exposures	779.8
EU-10	Corporates	151.7
EU-11	Exposures in default	72.7
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	91.2

The management of excessive leverage risk is integrated into the Bigbank's risk management framework (including procedures, limits, planning, etc.). Bigbank uses the leverage ratio according to Regulation (EU) No 575/2013 as a main indicator for monitoring excessive leverage risk as well other indicators based on the balance sheet structure. The risk of excessive leverage is considered in strategic planning and shall be assessed and forecasted as a part of capital planning process. The funding shall be arranged in such a way that the necessary funding is reasonably balanced between proportion of external funding sources and Tier1 capital. The aim is to have stable and conservative balance sheet structure. The Finance Area is responsible for managing the risk of excessive leverage as a first line of defence. The excessive leverage risk and balance sheet developments is regularly monitored and reported to the Management Board and Supervisory Board. Management board shall, if necessary, approve an action plan to address changes in the leverage ratio.

The leverage ratio was 9.45% as at 31 December 2024 (10.22% as at 31 December 2023). The leverage ratio is calculated as the ratio of Tier 1 capital to total assets. During the disclosing period the decrease in the leverage ratio was affected by the increase in credit risk exposures resulting from increasing business volumes and the resulting increase in the total risk exposure amount.

OWN FUNDS REQUIREMENTS AND RISK-WEIGHTED EXPOSURE AMOUNTS

The information regarding own funds requirements and risk-weighted exposure amounts is disclosed according to Article 438 of the Capital Requirements Regulation.

Table 12. EU OV1 - Overview of total risk exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		31.12.2024	31.12.2023	31.12.2024
in million EUR				
1	Credit risk (excluding CCR)	1,643.1	1,338.9	131.4
2	Of which the standardised approach	1,643.1	1,338.9	131.4
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk - CCR	-	-	-
7	Of which the standardised approach	-	-	-
8	Of which internal model method (IMM)	-	-	-
EU8a	Of which exposures to a CCP	-	-	-
EU8b	Of which credit valuation adjustment - CVA	-	-	-
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	-	-	-
EU19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	18.4	5.9	1.5
21	Of which the standardised approach	18.4	5.9	1.5
22	Of which IMA	-	-	-
EU22a	Large exposures			
23	Operational risk	170.4	149.6	13.6
EU23a	Of which basic indicator approach	-	-	-
EU23b	Of which standardised approach	170.4	149.6	13.6
EU23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-
29	Total	1,831.9	1,494.3	146.6

Bigbank's total risk exposure amount (TREA) was 1,831.9 million euros at the end of 2024, increasing by 337.6 million euros during a year (1,494.3 million euros at the end of 2023). The TREA increase was driven by the increase of credit risk exposure amount due to increased lending volumes. Bigbank uses the standardised approach for calculating credit, market and operational risk own funds requirements.

COUNTERCYCLICAL CAPITAL BUFFERS

Information on the countercyclical buffers is disclosed according to Articles 440 of the Capital Requirements Regulation.

Table 13. EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

		General credit exposures		Relevant credit exposures - Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amount	Own fund requirements weights (%)	Countercyclical buffer rate (%)
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures - Securitisation positions in the non-trading book	Total			
in million EUR														
010	Estonia	716.5	-	-	-	-	716.5	57.3	-	-	57.3	716.5	0.44	1.5%
011	Finland	105.9	-	-	-	-	105.9	8.5	-	-	8.5	105.9	0.06	0%
012	Bulgaria	3.1	-	-	-	-	3.1	0.3	-	-	0.3	3.1	0.00	2.0%
013	Latvia	251.2	-	-	-	-	251.2	20.1	-	-	20.1	251.2	0.15	0.5%
014	Lithuania	537.0	-	-	-	-	537.0	43.0	-	-	43.0	537.0	0.33	1.0%
015	Norway	0.4	-	-	-	-	0.4	0.0	-	-	0.0	0.4	0.00	2.5%
016	Sweden	19.9	-	-	-	-	19.9	1.6	-	-	1.6	19.9	0.01	2.0%
020	Total	1,634.0	-	-	-	-	1,634.0	130.7	-	-	130.7	1,634.0	1.00	

Table 14. EU CCyB2 - Amount of institution-specific countercyclical capital buffer

in million EUR		31.12.2024
010	Total risk exposure amount	1,831.9
020	Institution specific countercyclical capital buffer rate	1.09%
030	Institution specific countercyclical capital buffer requirement	20.0

CREDIT RISK

Information on the credit risk is disclosed according to Articles 442, 444, 453 of the Capital Requirements Regulation.

Table 15. EU CR1 - Performing and non-performing exposures and related provisions

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures		Non-performing exposures		Performing exposures – accumulated impairment and provisions						On non-performing exposures				
		Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3							
in million EUR																
005	Cash balances at central banks and other demand deposits	447.5	447.5	-	-	-	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	2,152.3	2,060.9	91.4	109.3	-	109.3	-21.2	-13.2	-8.0	-30.7	-	-30.7	-	1,397.2	48.5
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

050	Other financial corporations	38.3	38.3	-	-	-	-	-	-	-	-	-	-	-	19.9	-
060	Non-financial corporations	722.6	674.2	48.4	40.6	-	40.6	-1.0	-0.4	-0.6	-0.2	-	-0.2	-	666.3	40.4
070	Of which SMEs	677.3	628.9	48.4	40.6	-	40.6	-1.0	-0.4	-0.6	-0.2	-	-0.2	-	639.5	40.4
080	Households	1,391.5	1,348.4	43.1	68.6	-	68.6	-20.2	-12.8	-7.4	-30.5	-	-30.5	-	711.0	8.1
090	Debt securities	22.3	22.3	-	-	-	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	15.1	15.1	-	-	-	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	4.7	4.7	-	-	-	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	2.5	2.5	-	-	-	-	-	-	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	173.8	173.8	-	-	-	-	-	-	-	-	-	-	-	-	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	26.4	26.4	-	-	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	112.8	112.8	-	-	-	-	-	-	-	-	-	-	-	-	-
210	Households	34.5	34.5	-	-	-	-	-	-	-	-	-	-	-	-	-
220	Total	2,795.9	2,704.5	91.4	109.3	-	109.3	-21.2	-13.2	-8.0	-30.7	-	-30.7	-	1,397.2	48.5

Table 16. EU CR1-A - Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					Total
in million EUR		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	
1	Loans and advances	0.1	276.2	1,126.7	783.5	-	2,186.5
2	Debt securities	-	5.9	8.5	7.9	-	22.3
3	Total	0.1	282.1	1,135.2	791.4	-	2,208.8

Table 17. EU CR2 - Changes in the stock of non-performing loans and advances

		a
in million EUR		Gross carrying amount
010	Initial stock of non-performing loans and advances	49.9
020	Inflows to non-performing portfolios	95.5
030	Outflows from non-performing portfolios	-21.2
040	Outflows due to write-offs	-13.6
050	Outflow due to other situations	-1.4
060	Final stock of non-performing loans and advances	109.2

Table 18. EU CQ1 - Credit quality of forborne exposures

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
			Of which defaulted	Of which impaired					
in million EUR									
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	5.2	19.0	19.0	19.0	-0.6	-7.8	3.1	2.8
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	-	-	-	-	-	-	-	-
060	Non-financial corporations	-	2.3	2.3	2.3	-	-	2.3	2.3
070	Households	5.2	16.7	16.7	16.7	-0.6	-7.8	0.8	0.5
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	-	-	-	-	-	-	-
100	Total	5.2	19.0	19.0	19.0	-0.6	-7.8	3.1	2.8

Table 19. EU CQ3 - Credit quality of performing and non-performing exposures by past due days

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures				Non-performing exposures							
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
in million EUR													
005	Cash balances at central banks and other demand deposits	447.5	447.5	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	2,152.4	2,137.9	14.5	109.2	55.1	11.5	18.2	18.4	5.9	0.1	-	109.2
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	38.3	38.3	-	-	-	-	-	-	-	-	-	-
060	Non-financial corporations	722.6	717.6	5.0	40.7	35.6	1.1	3.5	0.4	0.1	-	-	40.6
070	Of which SMEs	689.4	684.4	5.0	40.7	35.6	1.1	3.5	0.4	0.1	-	-	40.6
080	Households	1,391.5	1,382.0	9.5	68.5	19.5	10.4	14.7	18.0	5.8	0.1	-	68.6
090	Debt securities	22.3	22.3	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	15.1	15.1	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	2.5	2.5	-	-	-	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	173.8	173.8	-	-	-	-	-	-	-	-	-	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures				Non-performing exposures							
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
in million EUR													
190	Other financial corporations	26.4	26.4	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	112.8	112.8	-	-	-	-	-	-	-	-	-	-
210	Households	34.5	34.5	-	-	-	-	-	-	-	-	-	-
220	Total	2,796.0	2,781.5	14.5	109.2	55.1	11.5	18.2	18.4	5.9	0.1	-	109.2

Table 20. EU CQ4 - Quality of non-performing exposures by geography

		a	b	c	d	e	f	g
		Gross carrying/nominal amount			Of which subject to impairment	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				
in million EUR								
010	On-balance-sheet exposures	2,283.9		109.3		51.9	-	-
020	Estonia	942.6		48.5		18.2	-	-
030	Lithuania	800.3		29.4		10.0	-	-
040	Latvia	354.9		15.1		14.0	-	-
050	Finland	135.4		11.1		4.8	-	-
060	Sweden	23.8		2.2		2.9	-	-
070	Other countries	26.9		3.0		2.0	-	-
080	Off-balance-sheet exposures	173.8		-		-	-	-
090	Estonia	53.2		-		-	-	-
100	Lithuania	90.8		-		-	-	-
110	Latvia	29.7		-		-	-	-
120	Sweden	0.1		-		-	-	-
130	Finland	0.0		-		-	-	-
150	Total	2,457.7		109.3		51.9	-	-

Table 21. EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry

		a	b	c	d	e	f
		Gross carrying amount			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing		Of which defaulted			
in million EUR							
10	Agriculture, forestry and fishing	79.6	6.6	6.6	55.2	-0.1	-
20	Mining and quarrying	0.3	0.2	0.2	0.3	-	-
30	Manufacturing	9.8	-	-	9.8	-	-
40	Electricity, gas, steam and air conditioning supply	0.8	-	-	0.8	-	-
50	Water supply	1.6	-	-	1.6	-	-
60	Construction	44.4	0.6	0.6	44.4	-0.1	-
70	Wholesale and retail trade	16.9	3.4	3.4	16.9	-0.1	-
80	Transport and storage	4.9	0.6	0.6	4.9	-	-
90	Accommodation and food service activities	39.2	-	-	39.2	-0.3	-
100	Information and communication	1.8	-	-	1.8	-	-
110	Financial and insurance activities	-	-	-	-	-	-
120	Real estate activities	507.5	28.5	28.5	498.8	-0.6	-
130	Professional, scientific and technical activities	12.4	-	-	12.4	-	-
140	Administrative and support service activities	7.9	0.2	0.2	7.9	-	-
150	Public administration and defense, compulsory social security	-	-	-	-	-	-
160	Education	0.5	-	-	0.5	-	-
170	Human health services and social work activities	9.3	0.3	0.3	9.3	-	-
180	Arts, entertainment and recreation	8.6	-	-	8.6	-	-
190	Other services	17.7	0.2	0.2	17.7	-	-
200	Total	763.2	40.6	40.6	730.1	-1.2	-

Table 22. EU CQ7 – Collateral obtained by taking possession and execution processes

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
in million EUR			
010	Property, plant and equipment (PP&E)	-	-
020	Other than PP&E	-	-
030	Residential immovable property	-	-
040	Commercial immovable property	-	-
050	Movable property (auto, shipping, etc.)	-	-
060	Equity and debt instruments	-	-
070	Other collateral	-	-
080	Total	-	-

Table 23. EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives	
in million EUR		a	b	c	d	e
1	Loans and advances	783.8	1,477.8	1,474.8	3.0	-
2	Debt securities	22.3	-	-	-	-
3	Total	806.1	1,477.8	1,474.8	3.0	-
4	Of which non-performing exposures	60.7	48.5	48.5	-	-
EU-5	Of which defaulted	60.7	48.5	48.5	-	-

A description of the main types of collateral taken to mitigate credit risk and the main features of the policies and processes for the valuation and management of eligible collateral are set out in note 5 (Risk and capital management) of the Annual report.

Table 24. EU CR4 – Standardised approach – Credit risk exposure and CRM effects

Exposure classes		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
in million EUR							
1	Central governments or central banks	451.2	-	454.9	-	3.4	0.7%
2	Regional government or local authorities	-	-	-	-	-	-
3	Public sector entities	0.5	-	0.5	-	-	0%
4	Multilateral development banks	0.6	-	0.6	-	-	0%
5	International organisations	-	-	-	-	-	-
6	Institutions	21.6	-	21.6	-	5.7	26.4%
7	Corporates	32.6	0.9	32.6	-	29.4	90.2%
8	Retail	779.8	16.6	779.8	0,8	577.5	74.0%
9	Secured by mortgages on immovable property	1,193.0	124.6	1,189.4	13,4	682.3	56.7%
10	Exposures in default	72.8	0.2	72.7	0,1	93.7	128.7%
11	Exposures associated with particularly high risk	119.1	31.5	119.1	0,2	179.0	150.0%
12	Covered bonds	-	-	-	-	-	-
13	Institutions and corporates with a short-term credit assessment	7.3	-	7.3	-	1.5	20.5%
14	Collective investment undertakings	-	-	-	-	-	-
15	Equity	36.3	-	36.3	-	36.3	100.0%
16	Other items	34.3	-	34.3	-	34.3	100.0%
17	TOTAL	2,749.1	173.8	2,749.1	14,5	1,643.1	

The Group uses credit assessments by Moody's to calculate risk-weighted exposure amounts for credit exposures to central governments, central banks, public sector entities, multilateral development banks, credit institutions and corporates under the standardised approach. No changes have been made to the corresponding assignments during the disclosure period. Risk weights are determined using the standard association published by the EBA.

Table 25. EU CR5 – Standardised approach

Exposure classes		Risk weight								Total	Of which unrated
		0%	20%	35%	50%	75%	100%	150%	Others		
in million EUR		a	e	f	g	i	j	k	o	p	q
1	Central governments or central banks	448.1	-	-	6.7	-	-	-	-	454.9	454.9
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	0.5	-	-	-	-	-	-	-	0.5	0.5
4	Multilateral development banks	0.6	-	-	-	-	-	-	-	0.6	0.6
5	International organisations	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	16.9	-	-	-	-	-	-	21.6	16.0
7	Corporates	-	2.0	-	4.7	-	30.6	-	-	32.6	32.2
8	Retail exposures	-	-	-	-	780.6	-	-	-	780.6	780.6
9	Exposures secured by mortgages on immovable property	-	-	621.2	42.6	-	531.4	-	7.6	1,202.8	1,202.8
10	Exposures in default	-	-	-	-	-	30.9	41.9	-	72.8	72.8
11	Exposures associated with particularly high risk	-	-	-	-	-	-	119.3	-	119.3	119.3
12	Covered bonds	-	-	-	-	-	-	-	-	-	-
13	Exposures to institutions and corporates with a short-term credit assessment	-	7.3	-	-	-	-	-	-	7.3	5.9
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-
15	Equity exposures	-	-	-	-	-	36.3	-	-	36.3	36.3
16	Other items	-	-	-	-	-	34.3	-	-	34.3	34.3
17	TOTAL	449.2	26.2	621.2	54.0	780.6	663.5	161.2	7.6	2,763.5	2,756.1

MARKET RISK

Information on the market risk is disclosed according to Article 445 of the Capital Requirements Regulation.

Table 26. EU MR1 - Market risk under the standardised approach

in million EUR	a
	RWEAs
Outright products	18.4
1 Interest rate risk (general and specific)	-
2 Equity risk (general and specific)	-
3 Foreign exchange risk	18.4
4 Commodity risk	-
Options	-
5 Simplified approach	-
6 Delta-plus approach	-
7 Scenario approach	-
8 Securitisation (specific risk)	-
9 Total	18.4

INTEREST RATE RISK ON POSITIONS NOT HELD IN THE TRADING BOOK

Information on the interest rate risks of non-trading book activities (IRRBB) is disclosed according to Article 448 of the Capital Requirements Regulation. Additional information on the management of IRRBB is disclosed in Note 5 (Risk and capital management) of the Annual report. Table EU IRRBB1 complements the information disclosed in the Annual report.

Table 27. EU IRRBB1 - Interest rate risks of non-trading book activities

Supervisory shock scenarios	a	b	c	d
	Changes of the economic value of equity		Changes of the net interest income	
	31.12.2024	31.12.2023	31.12.2024	31.12.2023
in million EUR				
1 Parallel up	-9.0	-12.2	-0.6	-1.0
2 Parallel down	0.7	3.0	0.3	0.7
3 Steepener	5.1	4.9		
4 Flatteners	-10.4	-10.5		
5 Short rates up	-11.3	-12.7		
6 Short rates down	5.5	6.1		

Changes in interest rate risk compared to the end of year 2023 are mainly due to structural changes in interest-sensitive assets and liabilities.

OPERATIONAL RISK

Information on the operational risk is disclosed according to Article 446 of the Capital Requirements Regulation. Operational risk management is described in the Note 5 (Risk and capital management) of the Annual report.

Table 28. EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk exposure
		31.12.2022	31.12.2023	31.12.2024		
in million EUR						
1	Banking activities subject to basic indicator approach (BIA)	-	-	-	-	-
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	93.4	109.2	115.5	13.6	170.4
3	Subject to TSA:	93.4	109.2	115.5		
4	Subject to ASA:	-	-	-	-	-
5	Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

ENCUMBERED AND UNENCUMBERED ASSETS

Information on the encumbered and unencumbered assets is disclosed according to Article 443 of the Capital Requirements Regulation.

Table 29. EU AE1 - Encumbered and unencumbered assets

		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
in million EUR									
010	Assets of the disclosing institution	-				2,620.1			
030	Equity instruments	-		-		-		-	
040	Debt securities	-		-		13.9		13.9	
050	of which: covered bonds	-		-		-		-	
060	of which: securitisations	-		-		-		-	
070	of which: issued by general governments	-		-		8.9		8.9	
080	of which: issued by financial corporations	-		-		0.4		0.4	
090	of which: issued by non-	-		-		2.5		2.5	

		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	
in million EUR		010	030	040	050	060	080	090	100
120	financial corporations	-				2,609.4			
	Other assets	-							

Table 30. EU AE2 - Collateral received and own debt securities issued

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
in million EUR		010		040	
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	-		-	

Table 31. EU AE3 - Sources of encumbrance

		Matching liabilities, contingent liabilities or securities lent		Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered	
in million EUR		010		030	
010	Carrying amount of selected financial liabilities	-		-	

As at the reporting date, the Group's assets were unencumbered.

LIQUIDITY RISK

Information on the liquidity risk is disclosed according to Article 451a of the Capital Requirements Regulation. Additional information is provided in the Note 5 (Risk and capital management) of the Annual report.

Table 32. EU LIQ1 - Quantitative information of LCR

in million EUR EU 1a	Quarter ending on	a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
		31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024
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)					523.3	525.7	494.3	406.1
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	1,136.9	1,109.3	1,048.6	943.7	164.5	152.1	141.4	128.1
3	Stable deposits	7.5	0.0	0.0	0.0	0.4	0.0	0.0	0.0
4	Less stable deposits	1,129.4	1,109.3	1,048.6	943.7	164.2	152.1	141.4	128.1
5	Unsecured wholesale funding	4.6	2.2	2.0	1.7	2.6	1.5	1.4	1.2
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	Non-operational deposits (all counterparties)	4.0	1.6	1.5	1.2	2.0	0.9	0.8	0.7
8	Unsecured debt	0.6	0.5	0.5	0.5	0.6	0.5	0.5	0.5
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	167.6	154.0	147.4	134.6	20.7	17.4	14.3	10.7
11	Outflows related to derivative exposures and other collateral requirements	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	Outflows related to loss of funding on debt products	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	Credit and liquidity facilities	167.6	154.0	147.4	134.6	20.7	17.4	14.3	10.7
14	Other contractual funding obligations	2.2	1.7	1.8	2.1	0.0	0.0	0.0	0.0
15	Other contingent funding obligations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
16	TOTAL CASH OUTFLOWS					187.8	171.0	157.0	140.0
CASH - INFLOWS									

in million EUR EU 1a	Quarter ending on	a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
		31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	67.7	62.4	60.1	56.3	50.7	47.4	46.7	45.1
19	Other cash inflows	-	-	-	-	-	-	-	-
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 specialised credit institution)					-	-	-	-
20	TOTAL CASH INFLOWS	67.7	62.4	60.1	56.3	50.7	47.4	46.7	45.1
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	67.7	62.4	60.1	56.3	50.7	47.4	46.7	45.1
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					523.3	525.7	494.3	406.1
22	TOTAL NET CASH OUTFLOWS					137.1	123.6	110.3	94.9
23	LIQUIDITY COVERAGE RATIO					400.24%	431.66%	450.72%	423.90%

The level of the liquidity coverage ratio (LCR) depends on the dynamics of the liquidity buffer and net cash outflows. In 2024, the LCR remained stable at a high level, exceeding both regulatory and internal thresholds. The last 12 months' weighted average LCR stood at 400.24% at 31 December 2024 (31 December 2023: 403.84%). Over the year, the weighted average liquidity buffer increased from 317.3 million euros to 523.3 million euros, with an increase in the net cash outflow (weighted average value of 79.2 million euros at 31 December 2023 and 137.1 million euros at 31 December 2024).

The Group's funding is primarily based on retail deposits. In addition to retail deposits, the Bank has raised funds through the issuance of subordinated bonds. The concentration of funding sources by counterparty is low. The liquidity buffer consisted largely of funds held with central banks and commercial banks and of high credit quality bonds. The level of the LCR is monitored in euros. Group didn't have any other material currencies (liabilities equal to or greater than 5% of total liabilities) as at 31 December 2024.

Table 33. EU LIQ2 - Net Stable Funding Ratio

Vastavalt kapitalinõuete määruse artikli 451a lõikele 3

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
in million EUR						
Available stable funding (ASF) Items						
1	Capital items and instruments	-	-	-	349.4	349.4
2	Own funds	-	-	-	349.4	349.4
3	Other capital instruments	-	-	-	-	-
4	Retail deposits	-	1,729.3	254.1	385.5	2,199.6
5	Stable deposits	-	397.7	183.0	213.1	764.7
6	Less stable deposits	-	1,331.6	71.2	172.5	1,434.9
7	Wholesale funding:	-	24.0	0.4	0.0	10.5
8	Operational deposits	-	-	-	-	-
9	Other wholesale funding	-	24.0	0.4	0.0	10.5
10	Interdependent liabilities	-	-	-	-	-
11	Other liabilities:	-	0.0	0.0	14.9	14.9
12	NSFR derivative liabilities	-	-	-	-	-
13	All other liabilities and capital instruments not included in the above categories	-	-	-	14.9	14.9
14	Total available stable funding (ASF)	-	1,753.7	254.5	749.8	2,574.5
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)	419.7	21.2	-	-	0.3
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool	-	-	-	-	-
16	Deposits held at other financial institutions for operational purposes	-	-	-	-	-
17	Performing loans and securities:	-	187.0	118.6	1,841.0	1,587.6
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut	-	-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions	-	-	-	-	-
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:	-	148.5	111.6	1,213.6	1,161.7
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	-	-	-	-	-

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
in million EUR		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
22	Performing residential mortgages, of which:	-	8.2	6.9	604.0	400.2
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	-	8.2	6.9	604.0	400.2
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products	-	30.3	0.2	23.3	25.8
25	Interdependent assets	-	-	-	-	-
26	Other assets:	-	53.9	4.1	124.1	168.7
27	Physical traded commodities	-	-	-	-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs	-				-
29	NSFR derivative assets	-				-
30	NSFR derivative liabilities before deduction of variation margin posted	-				-
31	All other assets not included in the above categories	-	53.9	4.1	124.1	168.7
32	Off-balance sheet items	-	16.2	5.7	151.9	8.8
33	Total RSF	419.7	278.3	128.3	2,117.0	1,765.4
34	Net Stable Funding Ratio (%)	0%	630.06%	198.35%	35.42%	145.83%

REMUNERATION

Information on remuneration principles according to Article 450 of the Capital Requirements Regulation is disclosed in the Annual report.

Table 34. EU REM1 amends the information according to the disclosure requirements. Table 36. EU REM5 gives the breakdown of the remuneration of other identified staff by business areas. The MB Management function includes members of the management board of Bigbank AS and the MB Supervisory function includes members of the supervisory board of Bigbank AS.

The amounts of remuneration provided are gross numbers, including contributions to social security, fixed salaries, variable remuneration and vacation pay.

Table 34. EU REM1 - Remuneration awarded for the financial year

in million EUR			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	6	5	-	16
2		Total fixed remuneration	0.1	1.0	-	1.9
3		Of which: cash-based	0.1	1.0	-	1.9
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	-	-	-	-
5		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x		Of which: other instruments	-	-	-	-
7		Of which: other forms	-	-	-	-
9	Variable remuneration	Number of identified staff	-	6	-	16
10		Total variable remuneration	-	1.2	-	0.3
11		Of which: cash-based	-	1.2	-	0.3
12		Of which: deferred	-	-	-	-
EU-13a		Of which: shares or equivalent ownership interests	-	-	-	-
EU-14a		Of which: deferred	-	-	-	-
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-14b		Of which: deferred	-	-	-	-
EU-14x		Of which: other instruments	-	-	-	-
EU-14y		Of which: deferred	-	-	-	-
15		Of which: other forms	-	-	-	-
16		Of which: deferred	-	-	-	-
17	Total remuneration (2 + 10)		0.1	2.2	-	2.1

Table 35. EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

in million EUR		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards					
1	Guaranteed variable remuneration awards - Number of identified staff	-	-	-	-
2	Guaranteed variable remuneration awards -Total amount	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
Severance payments awarded in previous periods. that have been paid out during the financial year					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	-	-	-	-
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	-	-
Severance payments awarded during the financial year					
6	Severance payments awarded during the financial year - Number of identified staff	-	-	-	-
7	Severance payments awarded during the financial year - Total amount	-	-	-	-
8	Of which paid during the financial year	-	-	-	-
9	Of which deferred	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
11	Of which highest payment that has been awarded to a single person	-	-	-	-

Table 36. EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
		MB Supervisory function	MB Management function	Total MB	Invest- ment banking	Retail banking	Asset manage- ment	Corporate functions	Indepen- dent internal control functions	All other	Total
in million EUR											
1	Total number of identified staff										27
2	Of which: members of the MB	6	5	11							
3	Of which: other senior management				-	-	-	-	-	-	
4	Of which: other identified staff				-	5	-	3	4	4	
5	Total remuneration of identified staff	0.2	2.1	2.3	-	0.8	-	0.3	0.5	0.5	
6	Of which: variable remuneration	-	1.2	1.2	-	0.1	-	0.0	0.1	0.1	
7	Of which: fixed remuneration	0.2	0.9	1.1	-	0.7	-	0.3	0.4	0.4	

Table EU REM3 (Deferred Remuneration) is not published as the deferral of remuneration is not implemented in the group. Table EU REM4 (Remuneration of 1 million euros or more per year) is not published, as in 2024 there were no employees in the group whose remuneration would meet the criteria.