

 Banka

**Disclosures under Pillar 3
of the Basel standards as
at 31 March 2025**



Company name: **SID – Slovenska izvozna in razvojna banka, d.d., Ljubljana**
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1 Introduction

SID – Slovenska izvozna in razvojna banka, d.d., Ljubljana (hereinafter: SID Bank or the Bank) draws up disclosures under Pillar 3 of the Basel standards in accordance with Part Eight of the CRR. The disclosures as at 31 March 2025 were drawn up for the first time in accordance with Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637 (hereinafter: Commission Implementing Regulation 2024/3172).

SID Bank has the status of other systemically important institution (O-SII), which means that it is treated as a large institution in accordance with Article 4(146)(b) of the CRR. SID Bank has issued bonds that have been admitted for trading on a regulated market. Accordingly, the Bank is bound to the frequency and scope of disclosures set out in Article 433(a) of the CRR.

The disclosures have been drawn up on an individual basis for SID Bank, given that none of the subsidiaries meets the conditions for inclusion in prudential consolidation in accordance with the CRR.

The Bank discloses the required data and information in the templates prescribed by Commission Implementing Regulation 2024/3172. In accordance with Article 432 of the CRR, the Bank does not disclose certain rows or columns in individual templates that are not relevant to SID Bank. The Bank did not omit any information regarded as proprietary or confidential.

All amounts in the disclosures are in EUR thousand. The figures as at 31 March 2025 are not audited.

Disclosures for previous periods are published on SID Bank's website (www.sid.si).

2 Disclosure of key metrics and overview of risk-weighted exposure

2.1 Template EU KM1 – Key metrics template

(Article 447(a) to (g) and Article 438(b) of the CRR)

		a	b	c	d	e
		31 Mar 2025	31 Dec 2024	30 Sep 2024	30 June 2024	31 Mar 2024
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	499,600	493,100	492,742	478,319	477,467
2	Tier 1 capital	499,600	493,100	492,742	478,319	477,467
3	Total capital	499,600	493,100	492,742	478,319	477,467
	Risk-weighted exposure amounts					
4	Total risk exposure amount	1,497,967	1,606,417	1,609,531	1,652,897	1,666,281
4a	Total risk exposure pre-floor	1,497,967				
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	33.35%	30.70%	30.61%	28.94%	28.65%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	33.35%				
6	Tier 1 ratio (%)	33.35%	30.70%	30.61%	28.94%	28.65%
6b	Tier 1 ratio considering unfloored TREA (%)	33.35%				
7	Total capital ratio (%)	33.35%	30.70%	30.61%	28.94%	28.65%
7b	Total capital ratio considering unfloored TREA (%)	33.35%				
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU-7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25%	2.25%	2.25%	2.25%	2.25%
EU-7e	of which: to be made up of CET1 capital (percentage points)	1.27%	1.27%	1.27%	1.27%	1.27%
EU-7f	of which: to be made up of Tier 1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.69%
EU-7g	Total SREP own funds requirements (%)	10.25%	10.25%	10.25%	10.25%	10.25%
	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 (%)	0.91%	0.50%	0.49%	0.50%	0.49%
EU-9a	Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU-10a	Other Systemically Important Institution buffer (%)	0.50%	0.25%	0.25%	0.25%	0.25%
11	Combined buffer requirement (%)	3.91%	3.25%	3.24%	3.25%	3.24%
EU-11a	Overall capital requirements (%)	14.16%	13.50%	13.49%	13.50%	13.49%
12	CET1 available after meeting the total SREP own funds requirements (%)	23.10%	20.45%	20.36%	18.69%	18.40%
	Leverage ratio					
13	Total exposure measure	2,847,906	2,920,373	2,993,470	2,950,710	2,847,156
14	Leverage ratio (%)	17.54%	16.88%	16.46%	16.21%	16.77%

		a	b	c	d	e
		31 Mar 2025	31 Dec 2024	30 Sep 2024	30 June 2024	31 Mar 2024
	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 (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
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%	3.00%	3.00%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	534,045	546,966	600,669	511,180	408,467
EU-16a	Cash outflows - Total weighted value	24,923	22,480	19,590	30,928	40,312
EU-16b	Cash inflows - Total weighted value	36,066	9,398	10,851	35,562	11,866
16	Total net cash outflows (adjusted value)	6,231	13,083	8,739	7,732	28,446
17	Liquidity coverage ratio (%)	8,571%	4,181%	6,874%	6,611%	1,436%
	Net Stable Funding Ratio					
18	Total available stable funding	2,249,456	2,434,732	2,485,872	2,636,340	2,535,430
19	Total required stable funding	1,496,999	1,513,969	1,527,448	1,595,166	1,613,771
20	NSFR ratio (%)	150.26%	160.82%	162.75%	165.27%	157.11%

The Bank's total capital ratio stood at 33.35% as at 31 March 2025 (31 December 2024: 30.70%), having increased by 2.65 percentage points as a result of an increase in Common Equity Tier 1 (CET1) capital and a decline in the total risk-weighted exposure amount (REA). The increase in capital was primarily attributable to the recognition in available own funds of part of the already allocated profit from the previous year.

The CRR3 has as of 1 January 2025 introduced the reporting of certain data in a template that refers to consideration of the output floor when the total risk-weighted exposure amount is calculated using internal models. SID Bank does not use internal models when calculating the total risk-weighted exposure amount, and is therefore not subject to the output floor in accordance with Article 92(3) of the CRR.

In addition to meeting the overall capital requirement (OCR), which stood at 14.16% as at 31 March 2025, the Bank must also meet the capital requirement under Pillar 2 guidance (P2G) in the amount of 1.75%. The aggregate capital requirement (OCR + P2G) thus amounted to 15.91% as at 31 March 2025, significantly below the Bank's total capital ratio. The aggregate capital requirement

was thus up 0.66 percentage points on the end of 2024, as a result of a change in the countercyclical capital buffer rate for exposures in Slovenia (from 0.5% to 1%) and an increase in the O-SII buffer rate (from 0.25% to 0.50%).

The leverage ratio stood at 17.54% as at 31 March 2025 (31 December 2024: 16.88%), still well above the regulatory requirement of 3%.

The liquidity coverage ratio (LCR) stood at 8,571% as at 31 March 2025 (31 December 2024: 4,181%). This ratio is quite volatile over time due to the Bank's specific role as a development institution (see note in Section 3.2).

The net stable funding ratio (NSFR) stood at 150.26% as at 31 March 2025 (31 December 2024: 160.82%). The decline was primarily attributable to issued bonds maturing in July 2025 being moved to a maturity bucket with a lower weight.

2.2 Template EU OV1 – Overview of total risk exposure amounts

(Article 438(d) of the CRR)

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31 Mar 2025	31 Dec 2024	31 Mar 2025
1	Credit risk (excluding CCR)	1,420,116	1,490,418	113,609
2	of which the standardised approach	1,420,116	1,490,418	113,609
6	Counterparty credit risk - CCR	7,390	6,488	591
9	of which other CCR	7,390	6,488	591
10	Credit valuation adjustments risk - CVA risk	7,390	36,540	591
EU 10a	of which the standardised approach (SA)	0	36,540	0
EU 10c	of which the simplified approach	7,390	0	591
24	Operational risk	63,071	72,972	5,046
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	17,603	18,377	1,408
29	Total (1+6+10+24)	1,497,967	1,606,417	119,837

SID Bank calculates capital requirements for credit risk and counterparty credit risk using the standardised approach, in accordance with the provisions of Part Three, Title II, Chapter 2 of the CRR.

The main factor in the lower total risk exposure amount for credit risk as at 31 March 2025 was that the Bank began applying Article 501 of the CRR, which allows adjustment of risk-weighted exposure amounts for exposures to SMEs.

As of 1 January 2025 the Bank calculates its capital requirements for operational risk in accordance with Articles 312 to 314 of the CRR. The total exposure to operational risk as at 31 March 2025 was down EUR 9.9 million on the end of 2024, primarily as a result of the new approach to calculation under the aforementioned articles. Until the end of 2024 the Bank was using a simplified approach, which was abolished under the CRR3.

Following the introduction of the CRR3 the Bank uses a simplified approach as cited in Article 385 of the CRR to calculate the capital requirement for credit valuation adjustment (CVA) risk. The total risk exposure amount for CVA risk as at 31 March 2025 was down EUR 29.2 million on the end of 2024, primarily as a result of the change in approach.

SID Bank does not hold any positions in the trading book, and therefore does not calculate capital requirements for market risk for that purpose. In the scope of market risk, the Bank only calculates capital requirements for currency risk in accordance with Articles 351 to 354 of the CRR. Those requirements are calculated when the sum of the overall net foreign exchange position exceeds 2% of the total capital for capital adequacy purposes. SID Bank's exposure to currency risk is low and does not exceed the prescribed regulatory limit for the calculation of the capital requirement for currency risk in accordance with Article 351 of the CRR. The Bank is thus not required to formulate capital requirements for that purpose.

3 Liquidity requirement

3.1 Template EU LIQ1 – Quantitative information of LCR

(Article 451a(2) of the CRR)

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU-1a	Quarter ending on	31 Mar 2025	31 Dec 2024	30 Sep 2024	30 June 2024	31 Mar 2025	31 Dec 2024	30 Sep 2024	30 June 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)					531,759	497,045	471,775	454,203
CASH OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	0	0	0	0	0	0	0	0
3	Stable deposits	0	0	0	0	0	0	0	0
4	Less stable deposits	0	0	0	0	0	0	0	0
5	Unsecured wholesale funding	17,501	17,214	25,907	25,579	17,501	17,214	25,907	25,579
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	0	0	0	0	0	0	0	0
7	Non-operational deposits (all counterparties)	12,774	12,486	18,904	18,576	12,774	12,486	18,904	18,576
8	Unsecured debt	4,727	4,727	7,003	7,003	4,727	4,727	7,003	7,003
9	Secured wholesale funding					0	0	0	0
10	Additional requirements	106,394	104,918	99,213	107,554	14,671	13,290	15,342	17,353
11	Outflows related to derivative exposures and other collateral requirements	1,036	1,036	854	828	1,036	1,036	854	828
12	Outflows related to loss of funding on debt products	0	0	0	0	0	0	0	0
13	Credit and liquidity facilities	105,358	103,882	98,360	106,726	13,635	12,254	14,489	16,525
14	Other contractual funding obligations	1,735	3,623	3,625	3,566	341	2,210	2,166	2,126
15	Other contingent funding obligations	82,355	97,509	99,424	98,412	4,601	5,201	5,672	5,466
16	TOTAL CASH OUTFLOWS					37,115	37,914	49,088	50,524
CASH INFLOWS									
17	Secured lending (e.g. reverse repos)	0	0	0	0	0	0	0	0
18	Inflows from fully performing exposures	18,119	17,188	18,284	19,893	13,377	12,379	13,157	14,668
19	Other cash inflows	5,048	4,948	3,847	3,675	5,048	4,948	3,847	3,675
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)					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution)					0	0	0	0
20	TOTAL CASH INFLOWS	23,168	22,136	22,132	23,567	18,425	17,327	17,004	18,343

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU-1a	Quarter ending on	31 Mar 2025	31 Dec 2024	30 Sep 2024	30 June 2024	31 Mar 2025	31 Dec 2024	30 Sep 2024	30 June 2024
EU-20a	Fully exempt inflows	0	0	0	0	0	0	0	0
EU-20b	Inflows subject to 90% cap	0	0	0	0	0	0	0	0
EU-20c	Inflows subject to 75% cap	23,168	22,136	22,132	23,567	18,425	17,327	17,004	18,343
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					531,759	497,045	471,775	454,203
22	TOTAL NET CASH OUTFLOWS					21,291	21,742	33,238	33,453
23	LIQUIDITY COVERAGE RATIO					4,615%	4,162%	3,546%	3,255%

3.2 Qualitative information on LCR

(Article 451a(2) of the CRR)

	Qualitative information	
(a)	Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time.	The Bank maintains a high liquidity coverage ratio (LCR), which is quite volatile over time due to the Bank's specific role as a development institution and its readiness to intervene as required, and the fact that SID Bank does not accept deposits from the public but rather acquires long-term funding in the main supported by a Slovenian government guarantee. The Bank obtains funding primarily on international financial markets and at related financial institutions. Consequently the Bank does not have major outflows over the period of 30 days taken into account in the calculation of the ratio, except for maturing long-term funding.
(b)	Explanations on the changes in the LCR over time.	
(c)	Explanations on the actual concentration of funding sources.	
(d)	High-level description of the composition of the institution's liquidity buffer.	The liquidity buffer consists of extremely high-quality liquid assets and high-quality liquid assets.
(e)	Derivative exposures and potential collateral calls.	The Bank concludes swap transactions to manage interest rate risk. The Bank calculates exposure to counterparty credit risk using the original exposure method in accordance with Article 282 of the CRR. The Bank holds collateral for its transactions in derivatives in the form of a cash deposit in domestic currency.
(f)	Currency mismatch in the LCR.	The amount of assets that make up the liquidity buffer and the amount of liquidity outflows only comprise items denominated in euros. The proportion of liquidity inflows accounted for by other currencies is negligible.
(g)	Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile.	The Bank does not include any items not included in the table of LCR disclosures in the calculation of LCR.

4 List of templates for quarterly reporting from Commission Implementing Regulation 2024/3172

Article and Annex title in Regulation 2024/3172	Article in CRR	Template	Reporting frequency	Chapter in disclosures
Disclosure of key metrics and overview of risk-weighted exposure amounts				
Article 1	article 447(a) to (g) and article 438(b)	EU KM1	Quarterly	2.1
Article 1	article 438(d)	EU OV1	Quarterly	2.2
Article 1	article 438(da)	EU CMS1	Quarterly	Not relevant – the bank does not use internal models for calculating RWA
Article 1	article 438(da)	EU CMS2	Quarterly	Not relevant – the bank does not use internal models for calculating RWA
Disclosure of liquidity requirements				
Article 8	article 451a(2)	EU LIQ1	Quarterly	3.1
Article 8	article 451a(2)	EU LIQB	Quarterly	3.2
Disclosure of the use of the IRB approach to credit risk				
Article 12	article 438(h)	EU CR8	Quarterly	Not relevant – the bank does not use the IRB approach for credit risk
Disclosure of exposures to counterparty credit risk				
Article 14	article 438(h)	EU CCR7	Quarterly	Not relevant – the bank does not use internal models for calculating CCR
Disclosure of the use of standardised approach and internal models for market risk				
Article 16	article 438(h)	EU MR2-B	Quarterly	Not relevant – the bank does not use internal models for calculating market risk
Disclosure of credit valuation adjustment risk				
Article 17	article 438(d) and article 438(h)	EU CVA4	Quarterly	Not relevant – the bank does not use the standardised approach for calculating CVA

List of abbreviations and terms

CCR	Counterparty credit risk
CET1	Common Equity Tier 1 Capital
CRR	Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (with amendments)
CRR3	Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor
CVA	Credit Valuation Adjustment
EU	European Union
HQLA	High-quality liquid assets
IRB	Internal Ratings Based Approach
LCR	Liquidity Coverage Ratio
NSFR	Net Stable Funding Ratio
OCR	Overall capital requirement
O-SII	Other Systemically Important institution
P2G	Pillar 2 guidance
SMEs	Small and Medium sized Enterprises
SREP	Supervisory Review and Evaluation Process
RWA	Risk Weighted Assets
TREA	Total Risk Exposure Amount