



Pillar 3 Report

2024

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Risk management

The information on capital adequacy and risk management published in this document and in the Annual Report 2024 of Coop AS group has been prepared in accordance with the Capital Requirements Directive 2013/36/EU (CRD IV) and the Capital Requirements Regulation (EU) 575/2013 (CRR).

Annual Report 2024 of Coop Pank AS group, published on the bank's website www.cooppank.ee, contains information on the risk profile of the consolidation group, the total amount and composition of capital requirements and the total amount and composition of own funds, which is the basis for calculating the capital adequacy ratio. The requirements set out in Article 439 of Regulation (EU) 575/2013 do not apply to the Group, due to absence of the respective exposures. The group's risk management principles are described in Note 2 "Risk management" of the Annual Report 2024.

Key ratios and indicators of exposure

In thousands of euros	31.12.2024	31.12.2023
Net loan portfolio	1,774,118	1,490,873
Credit cost per year on average loan portfolio	0.30%	0.50%
Liquid assets to total assets ratio	17.43%	23.40%
Capital adequacy*	19.41%	19.61%

* The accepted profit of the reporting period includes profit for the nine-month period ending on 30 September, which was approved by the Financial Supervisory Authority and from which expected dividend payments have been deducted.

The Group's risk strategy operates in accordance with the operational strategy approved by the Supervisory Board. The Group focuses on growing business volumes. As a result, the Group's risk appetite is medium in the credit risk, market risk and strategic risk categories and low in the operational risk, liquidity risk, reputation risk and real estate risk categories.

Group's risk appetite by main risk categories		Credit risk	Market risk	Liquidity risk	Operational risk	Real estate risk	Strategic risk	Reputational risk
		Medium	Medium	Low	Low	Low	Medium	Low
Risk control measures	Avoidance							X
	Limiting	X	X	X	X	X	X	
	Hedging	X	X		X	X	X	
	Separation	X	X	X	X		X	
	Insurance				X	X		

Regular risk reporting to the management is carried out in the Group. In the event of a large-scale realisation of risks or a significant deviation from the general risk management principles, the Management Board and the Supervisory Board shall be notified immediately.

The Group uses risk-based capital planning, ensuring that all risks are adequately covered by own funds at all times. Capital planning is based on financial forecasts that take into account the Group's strategy, future expectations and risk profile, as well as risk appetite. The existing capital buffer is sufficient to permanently cover all risks taken to achieve the Group's strategic goals.

The Group implements the mandatory crisis prevention and resolution measures established by the Financial Crisis Prevention and Resolution Act in order to ensure the financial stability of the consolidation group, the sustainability of critical functions and the sufficient protection of depositors, investors and other customers funds. Thus, a recovery plan for the Group's financial position has been prepared and the Group monitors and complies at all times with the minimum level of own funds and eligible liabilities provided by law. As financing of the Group is organized through Coop Pank AS as the parent company, then the Group does not use intra-group financial support measure. Consequently, any group undertaking hasn't entered into a financial support agreement under which it may provide financial support to another group undertaking.

Disclosure requirement with reference to CRR Article

	Primary location in our Annual Report	Primary location in our Pillar 3 report
Article 435. Risk management objectives and policies	p 51-52	p 3-4
Article 436. Scope of application	N/A	p 5
Article 437. Own funds	p 15, 53	p 5-12
Article 438. Capital requirements and RWA	p 15-16, 53-54	p 5-12
Article 439. Exposure to counterparty credit risk	N/A	p 6
Article 440. Countercyclical capital buffers	p 15-16	p 14
Article 441. Indicators of global systemic importance	N/A	N/A
Article 442. Credit risk adjustments	p 58-73	p 15-17
Article 443. Encumbered and unencumbered assets	N/A	p 13
Article 444. Use of the Standardised Approach	p 15	N/A
Article 445. Exposure to market risk	p 77-81	N/A
Article 446. Operational risk	p 81	N/A
Article 447. Key metrics	p 14-15	p 7
Article 448. Exposure to interest rate risk on positions not included in the trading book	p 79-81	N/A
Article 449. Exposure to securitisation positions	N/A	N/A
Article 449a. Disclosure of environmental, social and governance risks (ESG risks)	p 81-83	N/A
Article 450. Remuneration policy	p 35-37	N/A
Article 451. Leverage ratio	p 14	p 7, 11-12
Article 451a. Liquidity requirements	p 14, 75-77	p 7, 19-20
Article 452. Use of the IRB Approach to credit risk	N/A	N/A
Article 453. Use of credit risk mitigation techniques	N/A	p 18
Article 454. Use of the Advanced Measurement Approaches to operational risk	N/A	N/A
Article 455. Use of Internal Market Risk Models	N/A	N/A
Article 473a. Introduction of IFRS 9	p 44	N/A

Information on the reconciliation between own funds balance sheet items

Disclosed information according to Annex VII Template EU CC2 of the commission implementing regulation (EL) nr 2021/637

The information of Coop Pank Group's own funds is provided according to corresponding CRR Regulation (EU) 575/2013 point (c) of Article 436 and Article 438. Coop Pank group's own funds tables show only those items and amounts that are relevant to the group.

In thousands of euros, as of 31.12.2024

Own funds	Value in the statement of financial position	Regulatory corrections	Regulatory own funds
Paid-up share capital	70,181	0	70,181
Share premium	26,711	0	26,711
Reserve capital	6,815	0	6,815
Retained earnings*	105,807	-12,632	93,175
Other reserves	2,123	-1,825	298
Tier 1 capital before adjustments	211,637	-14,457	197,180
Adjustments:			
Goodwill as intangible asset	-6,757	0	-6,757
Intangible assets	-12,954	0	-12,954
Adjustment of value arising from requirements of reliable measurement	0	-38	-38
Other deductions from Tier 1 capital	0	-1,821	-1,821
Other adjustments of own funds resulting from transitional provisions	0	0	0
Total regulatory adjustments of Tier 1 capital	-19,711	-1,859	-21,570
Additional Tier 1 capital	28,148	0	28,148
Total Tier 1 capital	220,074	-16,316	203,758
Subordinated debt	35,000	0	35,000
Total Tier 2 capital	35,000	0	35,000
Eligible capital for capital adequacy calculation	255,074	-16,316	238,758

* Retained earnings include the undistributed profits of previous periods recognised in the financial statement and the profit of 2024, from which the interim profit of the IV quarter of 2024 in the amount of 6,393 and estimated dividend payments in the amount of 6,239 thousand euros have been deducted as regulatory corrections. Regulatory own funds include the undistributed profits of previous periods and Interim profit for the 9 months of 2024, which has been audited by an independent auditor and received permission from the Financial Supervision Authority to include the profit.

Risk exposure amounts and capital requirements

The Group calculates capital requirement arising from credit risk exposures according to the standardised approach and operational risk exposure according to basic indicator approach. All the exposures, risk-weighted exposures and capital requirements per exposure class as of 31.12.2024 can be found in the tables below.

Disclosed information according to Annex I of the commission implementing regulation (EL) nr 2021/637

In thousands of euros

Template EU OV1 – Overview of total risk exposure amounts	Net exposure	Risk-weighted exposure amount	Minimum regulatory capital requirement
1. Credit risk (excluding CCR)			
2. of which the standardised approach			
Central governments and central banks	349,312	6,182	495
Public sector entities and local governments	22	11	1
Credit institutions, investment companies	7,733	2,985	239
Companies	158,752	118,676	9,494
Retail receivables	259,597	185,366	14,829
Receivables secured by mortgage on real estate	1,293,884	617,130	49,370
Receivables past due	9,792	11,196	895
Items subject to particularly high risk	77,825	116,737	9,339
Investments in equity	13	13	1
Other assets	11,972	9,960	797
Total balance sheet exposures	2,168,902	1,068,256	85,460
Off-balance sheet liabilities (the standardised approach)			
Central government	2	1	0
Companies	7,461	5,943	475
Retail receivables	9,986	6,281	503
Receivables secured by mortgage on real estate	29,606	21,518	1,722
Receivables past due	16	21	2
Items subject to particularly high risk	10,143	15,213	1,217
Total off-balance sheet exposures	57,214	48,977	3,919
Total credit risk exposure (standardised approach)	2,226,116	1,117,233	89,379
23 Operational risk	n/a	112,728	9,018
EU 23a Of which basic indicator approach	n/a	112,728	9,018
29. Total risk exposure amounts and minimum capital requirement	2,226,116	1,229,961	98,397

Template EU CR5. Standardised approach	Risk weight								Total
	0%	20%	35%	50%	75%	100%	150%		
Exposure classes									
Central governments	318,399	30,915	0	0	0	0	0	0	349,314
Local authorities	0	0	0	22	0	0	0	0	22
Credit institutions, investment companies	0	4,244	0	2,706	0	783	0	0	7,733
Corporates	0	19,972	0	0	0	146,241	0	0	166,213
Retail receivables	0	0	0	0	269,583	0	0	0	269,583
Secured by mortgages on immovable property	0	0	744,979	189,724	69,238	319,549	0	0	1,323,490
Exposures in default	0	0	0	0	0	6,991	2,817	0	9,808
Exposures associated with particularly high risk	0	0	0	0	0	0	87,968	0	87,968
Equity	0	0	0	0	0	13	0	0	13
Other items	1,766	310	0	0	0	9,896	0	0	11,972
Total risk-weighted assets	320,165	55,441	744,979	192,452	338,821	483,473	90,785	0	2,226,116

EU KM1. Key metrics template

Disclosed information according to Annex I of the commission implementing regulation (EL) nr 2021/637

In thousands of euros		31.12.2024	31.12.2023
Available own funds (amounts)			
1	Common Equity Tier1 (CET1) capital	175,610	150,106
2	Tier1 capital	203,758	178,206
3	Total capital	238,758	200,206
Risk-weighted exposure amounts			
4	Total risk-weighted assets	1,229,961	1,020,685
Capital,ratios,(as a percentage of risk exposure amount)			
5	Common Equity Tier1 (%)	14.28%	14.71%
6	Tier 1 ratio (%)	16.57%	17.46%
7	Total capital ratio (%)	19.41%	19.61%
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 (%)	2.75%	2.61%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.55%	1.47%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.06%	1.96%
EU 7d	Total SREP own funds requirements (%)	10.75%	10.61%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)			
8	Capital conservation buffer (%)	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%
9	Institution specific countercyclical capital buffer (%)	1.50%	1.50%
EU 9a	Systemic risk buffer (%)	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	0.00%	0.00%
11	Combined buffer requirement (%)	4.00%	4.00%
EU 11a	Overall capital requirements (%)	14.75%	14.61%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.23%	8.74%
Leverage ratio (as a percentage of risk exposure amount)			
13	Total exposure measure	2,226,116	2,112,215
14	Leverage ratio (%)	8.79%	8.44%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)			
EU 14c	Total SREP leverage ratio requirements (%)	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%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%
Liquidity Coverage Ratio			
15	Total,high-quality liquid assets (HQLA) (Weighted value -average)	332,059	426,354
EU 16a	Cash outflows - Total weighted value	180,418	159,838
EU 16b	Cash inflows - Total weighted value	19,802	14,528
16	Total net cash outflows (adjusted value)	160,615	145,310
17	Liquidity coverage ratio (%)	206.74%	293.41%
Net Stable Funding Ratio			
18	Total available stable funding	1,697,885	1,510,548
19	Total required stable funding	1,334,512	1,125,101
20	NSFR ratio (%)	127.23%	134.26%

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

Disclosed information according to Annex VII of the commission implementing regulation (EL) nr 2021/637

1	Issuer	Coop Pank AS	Coop Pank AS	Coop Pank AS	Coop Pank AS	Coop Pank AS	EEEE
2	Unique identifier (ISIN)	EE3100007857	EE3300002047	EE3300002542	EE3300002641	EE3300003649	LUB162036
3	Governing law(s) of the instrument	Estonian	Estonian	Estonian	Estonian	Estonian	Luxembourg
Regulatory treatment							
4	Transitional CCR rules	Common equity Tier 1	Tier 2	Tier 2	Tier 1	Tier 1	Tier 2
5	Post-transitional CRR rules	Common equity Tier 1	Tier 2	Tier 2	Tier 1	Tier 1	Tier 2
6	Eligible at solo/(sub-) consolidated/ solo & (sub-)consolidated	solo and sub-consolidated	solo and sub-consolidated	solo and sub-consolidated	solo and sub-consolidated	solo and sub-consolidated	solo and sub-consolidated
7	Instrument type (types to be specified by each jurisdiction)	Share, (EU) 575/2013 Articles 28,29	Tier 2 subordinated bond, (EU) 575/2013 Article 63	Tier 2 subordinated bond, (EU) 575/2013 Article 63	Tier 1 subordinated bond, (EU) 575/2013 Article 61	Tier 1 subordinated bond, (EU) 575/2013 Article 61	Tier 2 subordinated loan, (EU) 575/2013 Article 63
8	Amount recognised in regulatory capital (MEUR, as of 31.12.2024)	97 M, EUR	10 M, EUR	10 M, EUR	16.1 M, EUR	12 M, EUR	15 M, EUR
9	Nominal amount of instrument	Without nominal value, § 222 ¹ of the Commercial Code	10 M, EUR	10 M, EUR	16.1 M, EUR	12 M, EUR	15 M, EUR
9a	Issue price	97 M, EUR	100.00%	100.00%	100.00%	100.00%	100.00%
9b	Redemption price	N/A	100.00%	100.00%	100.00%	100.00%	100.00%
10	Accounting classification	Share capital	liability – amortised cost				
11	Original date of issuance	19.07.1999	31.03.2021	14.03.2022	27.06.2022	18.09.2023	29.02.2024
12	Perpetual or dated	Perpetual	Dated	Dated	Perpetual	Perpetual	Dated
13	Original maturity date	No maturity	31.03.2031	10.03.2032	No Maturity	No Maturity	28.02.2034
14	Issuer call subject to prior supervisory approval	No	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	Issuer Call Option: 31.03.2026 100% or partial	Issuer Call Option: 31.03.2027 100% or partial	Issuer Call Option: 30.06.2027 100%	Issuer Call Option: 18.09.2028 100%	Issuer Call Option: 28.02.2029 100% or partial
16	Subsequent call dates, if applicable	N/A	Any time after 31.03.2026	Any time after 31.03.2027	Any time after 30.06.2027	Any time after 31.03.2026	Any time after 28.02.2029
Coupons / dividends							
17	Fixed or floating dividend/coupon	fixed	fixed	fixed	fixed	fixed	fixed
18	Coupon rate and any related index	N/A	5.50% per annum	5.00% per annum	10.00% per annum	12.00% per annum	3.50% +6MEuribor per annum
19	Existence of a dividend stopper	No	N/A	N/A	N/A	N/A	N/A

20 a	Fully discretionary, partially or mandatory (in terms of timing)	fully discretionary	mandatory	mandatory	mandatory	mandatory	mandatory
20 b	Fully discretionary, partially or mandatory (in terms of amount)	fully discretionary	mandatory	mandatory	mandatory	mandatory	mandatory
21	Existence of step up or other incentive to redeem	N/A	No	No	No	No	No
22	Noncumulative or cumulative	cumulative	cumulative	cumulative	cumulative	cumulative	cumulative
23	Convertible or non-convertible	non-convertible	non-convertible	non-convertible	non-convertible	non-convertible	non-convertible
30	Write-down features	No	No	No	Yes	Yes	No
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	Contractual and statutory. Decision by the Resolution authority	Contractual and statutory. Decision by the Resolution authority	N/A
32	If write-down, full or partial	N/A	N/A	N/A	Fully or partially	Fully or partially	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	Temporary	Temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	Contractual Reinstatement Procedure	Contractual Reinstatement Procedure	N/A
35	Positioning subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 2	other debt obligation	other debt obligation	Tier 2	Tier 2	other debt obligation
36	Non-compliant transitioned features	No	No	No	No	No	No

EU CC1. Composition of regulatory own funds

Disclosed information according to Annex VII of the commission implementing regulation (EL) nr 2021/637

The items and amounts of Coop Pank Group's own funds are presented as referred to in points (a), (d), (e) and (f) of Article 437 of CRR Regulation (EU) 575/2013 by following the instructions provided in the Annex VIII of (EL) nr 2021/637.

Coop Pank group's own funds tables show only those items and amounts that are relevant to the group.

In thousands of euros

Common Equity Tier 1 (CET1) capital: instruments and reserves		31.12.2024	31.12.2023
1	Capital instruments and the related share premium accounts	96,892	95,452
	of which: Instrument type 1	96,892	95,452
2	Retained earnings	93,175	69,037
3	Accumulated other comprehensive income (and other reserves to cover retained earnings on the basis of applied accounting procedures)	298	-459
3a	Funds for general banking risk	6,815	4,855
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	197,180	168,885
Common Equity Tier 1 (CET1) capital: regulatory adjustments		31.12.2024	31.12.2023
7	Additional value adjustments (negative amount)	-38	-36
8	Intangible assets (net of related tax liability) (negative amount)	-19,711	-17,595
12	Negative amounts resulting from the calculation of expected loss amounts	-1,821	-1,148
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-21,570	-18,779
29	Common Equity Tier 1 (CET1) capital	175,610	150,106
30	Additional Tier 1 (CET1)	28,148	28,100
45	Tier 1 capital (T1 = CET1 + AT1)	203,758	178,206
Tier 2 (T2) capital: instruments		31.12.2024	31.12.2023
46	Capital instruments and the related share premium accounts	35,000	22,000
51	Tier 2 (T2) capital before regulatory adjustments	35,000	22,000
57	Total regulatory adjustments to Tier 2 (T2) capital	0	0
58	Tier 2 (T2) capital	35,000	22,000
59	Total capital (TC = T1 + T2)	238,758	200,206
60	Total risk-weighted assets	1,229,961	1,020,685
Capital ratios and requirements including buffers		31.12.2024	31.12.2023
61	Common Equity Tier 1 capital (as a percentage of total risk exposure amount)	14.28%	14.71%
62	Tier 1 capital (as a percentage of total risk exposure amount)	16.57%	17.46%
63	Total capital (as a percentage of total risk exposure amount)	19.41%	19.61%
64	Institution CET1 overall capital requirements	10.05%	10.97%
65	of which: capital conservation buffer requirement	2.50%	2.50%
66	of which: countercyclical buffer requirement	1.50%	1.50%
67	of which: systemic risk buffer requirement	0.00%	0.00%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	8.23%	8.74%

Disclosure of CRR leverage ratio

Disclosed information according to Annex XI of the Commission implementing regulation (EU) nr 2021/637. Coop Pank group's leverage tables show only those items and amounts that are relevant to the group.

In thousands of euros

Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures		31.12.2024	31.12.2023
1	Total assets as per published financial statements	2,188,614	1,986,212
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	149,713	144,782
12	Other adjustments	-21,570	-18,779
13	Leverage ratio total exposure measure	2,316,757	2,112,215
Template EU LR2 - LRCom: Leverage ratio common disclosure		31.12.2024	31.12.2023
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	2,168,902	1,968,617
6	(Asset amounts deducted in determining Tier 1 capital)	-1,858	-1,184
7	Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets)	2,167,044	1,967,433
13	Total derivatives exposures	0	0
18	Total securities financing transaction exposures	0	0
19	Off-balance sheet exposures at gross notional amount	149,713	144,782
20	(Adjustments for conversion to credit equivalent amounts)	0	0
22	Other off-balance sheet exposures	149,713	144,782
EU-22k	(Total exempted exposures)	0	0
23	Tier 1 capital	203,758	178,206
24	Leverage ratio total exposure measure	2,316,757	2,112,215
25	Leverage ratio	8.79%	8.44%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%

CRR leverage ratio exposures

EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)		31.12.2024	31.12.2023
1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	2,168,902	1,968,617
2	Trading book exposures	0	0
3	Banking book exposures, of which:	2,168,902	1,968,617
4	Covered bonds	0	
5	Exposures treated as sovereigns	349,312	441,551
6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	22	4
7	Institutions	7,733	6,689
8	Secured by mortgages of immovable properties	1,293,884	1,078,325
9	Retail exposures	259,597	225,750
10	Corporate	158,752	142,983
11	Exposures in default	9,792	8,286
12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	89,810	65,029

Table EU LRA: Disclosure of LR qualitative information

- Description of the processes used for excessive leverage risk management:**
 In managing the risk of excessive leverage, the Group follows the requirements provided for in § 82² of the Credit Institutions Act. The Group monitors the dynamics of leverage risk quantitatively, mainly using the leverage indicator in accordance with Regulation (EU) No 575/2013. In order to manage the risk of excessive leverage, the Bank's Management Board and the Assets and Liabilities Management Committee monitor the leverage ratio, analyze changes in the balance sheet structure and forecasts and, if necessary, approve an action plan to respond to the changes in leverage ratio. When preparing the strategy and financial forecasts, it is taken into account that the leverage ratio normative would be met in a sustainable manner.
- Description of factors that had an impact on the leverage ratio during the reporting period:**
 The leverage ratio of the Coop Pank Group calculated in accordance with Article 1 of commission delegated regulation (EU) 2015/62 is 8.79% as of 31.12.2024 and 8.44% as of 31.12.2023. During 2024, the Group's business volumes have grown significantly, resulting in increased exposures, which in turn is the main reason for the increase in the leverage ratio in 2024.

Disclosure of encumbered and unencumbered assets

Disclosed information according to Annex XXXV of the Commission delegated regulation (EL) nr 2021/637

In thousands of euros, as of 31.12.2024

Template 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
	010	040	060	090
010 Assets of the reporting institution	334	334	2,188,280	2,188,280
030 Equity instruments	0	0	13	13
040 Debt securities	0	0	37,751	37,751
050 of which: covered bonds	0	0	0	0
060 of which: asset-backed securities	0	0	0	0
070 of which: issued by general governments	0	0	30,912	30,912
080 of which: issued by financial corporations	0	0	3,489	3,489
090 of which: issued by non-financial corporations	0	0	3,350	3,350
120 Other assets	334	334	2,150,516	2,150,516

Template 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
	010	040
Total assets, collateral received and own debt	334	n/a
250 Securities issued		

Template 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 ABSs encumbered
	010	030
010 Carrying amount of selected financial liabilities	n/a	n/a

Table EU AE4 - Accompanying narrative information

The Group's business strategy focuses mainly on the day-to-day banking (incl. deposits) and financing (incl. mortgage loans, unsecured loans and leasing) of private customers and small and medium-sized enterprises.

Mainly demand and term deposits and other long-term liabilities (e.g. debt Securities issued) serve as Resources for investments that require financing.

Thus, the group's assets are mostly unencumbered, except for deposits set to secure various settlements in the total amount of 334 thousand euros.

Disclosure of the countercyclical buffer requirement

Disclosed information according to Annex IX of the Commission delegated regulation (EL) nr 2021/637

In thousands of euros, as of 31.12.2024

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

		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposure		Own funds requirements					
		Exposure value for SA	Exposure Value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure Value for IRB	Of which: General credit exposure	Of which: Trading book exposure	Of which: Securitisation exposure	Total	Own funds requirement weights (1/100)	Counter-cyclical capital buffer rate (%)
010	By country	010	020	030	040	050	060	070	080	090	100	110	120
	Estonia	1,833,436						87,359			87,359	0.986	0.00
	Switzerland	12,179						798			798	0.009	0.00
	France	19,639						314			314	0.004	0.00
	Latvia	1,599						111			111	0.001	0.00
	Finland	999						31			31	0.000	0.00
	Other	1,195						31			31	0.000	0.00
020	Total	1,869,047	n/a	n/a	n/a	n/a	n/a	88,644	n/a	n/a	88,644	1.000	0.00

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

31.12.2024

Row		Column 010
010	Total risk exposure amount (EUR, thousand)	1,229,961
020	Institution specific countercyclical buffer rate (%)	1.50
030	Institution specific countercyclical buffer requirement (EUR, thousand)	18,449

Disclosure of non-performing and forborne exposures

Disclosed information according to Annex XV of the Commission delegated regulation (EL) nr 2021/637

In thousands of euros, as of 31.12.2024

Template 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
1	Loans, and advances	25,087	5,034	5,034	0	-2,128	-1,057	25,859	3,966
2	Central banks	0	0	0	0	0	0	0	0
3	General governments	0	0	0	0	0	0	0	0
4	Credit institutions	0	0	0	0	0	0	0	0
5	Other financial corporations	0	0	0	0	0	0	0	0
6	Non-financial corporations	8,726	3,071	3,071	0	-1,248	-768	9,781	2,302
7	<i>Households</i>	16,361	1,963	1,963	0	-880	-289	16,078	1,664
8	Debt securities	0	0	0	0	0	0	0	0
9	Loan commitments given	0	0	0	0	0	0	0	0
10	Total	25,087	5,034	5,034	0	-2,128	-1,057	25,859	3,966

In thousands of euros, as of 31.12.2024

Template 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 year ≤5 years	Past due >5 year ≤7 years	Past due >7 years	Of which defaulted
05	Cash balances at the Central Bank and other demand deposits	321,940	321,940	0	0	0	0	0	0	0	0	0	0
1	Loans and advances	1,797,819	1,790,383	7,436	14,822	8,352	2,312	1,446	1,853	751	46	62	14,822
2	Central banks	0	0	0	0	0	0	0	0	0	0	0	0
3	General governments	1	1	0	0	0	0	0	0	0	0	0	0
4	Credit institutions	0	0	0	0	0	0	0	0	0	0	0	0
5	Other financial corporations	86,119	86,119	0	0	0	0	0	0	0	0	0	0
6	Non-financial corporations	772,057	770,363	1,694	8,684	5,914	1,510	354	745	152	9	0	8,684
7	Of which SMEs	772,024	770,330	1,694	8,684	5,914	1,510	354	745	152	9	0	8,684
8	Households	939,642	933,900	5,742	6,138	2,438	802	1,092	1,108	599	37	62	6,138
9	Debt securities	37,751	37,751	0	0	0	0	0	0	0	0	0	0
10	Central banks	0	0										
11	General governments	30,912	30,912										
12	Credit institutions	3,489	3,489										
13	Other financial corporations	0	0										
14	Non-financial corporations	3,350	3,350										
15	Off-balance-sheet exposures	149,663			50								0
16	Central banks	0			0								
17	General governments	5			0								
18	Credit institutions	0			0								
19	Other financial corporations	5,331			0								
20	Non-financial corporations	114,753			46								
21	Households	29,574			4								
22	Total	2,307,173	2,150,74	7,436	14,872	8,352	2,312	1,446	1,853	751	46	62	14,822

Template 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			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
		Of which: stage 1.	Of which: stage 2		Of which: stage 2	Of which: stage 3		Of which: stage 1.	Of which: stage 2		Of which: stage 2	Of which: stage 3			
05	Cash balances at the Central Bank and other demand deposits	321,940	321,940	0	0	0	0	0	0	0	0	0	0	0	0
1	Loans and advances	1,797,819	1,739,788	52,015	14,822	0	14,526	-13,520	-9,570	-3,951	-5,031	0	-5,031	0	0
2	Central banks	0	0	0	0	0	0	0	0	0	0	0	0		
3	General governments	1	1	0	0	0	0	0	0	0	0	0	0		
4	Credit institutions	0	0	0	0	0	0	0	0	0	0	0	0		
5	Other financial corporations	86,119	86,119	0	0	0	0	-374	-374	0	0	0	0		
6	Non-financial corporations	772,057	748,173	23,884	8,684	0	8,684	-8,718	-6,689	-2,029	-2,432	0	-2,432		
7	of which SMEs	772,024	748,139	23,884	8,684	0	8,684	-8,718	-6,689	-2,029	-2,432	0	-2,432		
8	Households	939,642	905,495	28,131	6,138	0	5,842	-4,428	-2,507	-1,922	-2,599	0	-2,599		
9	Debt securities	37,751	37,751	0	0			0	0	0	0		0		
10	Central banks	0	0		0			0			0				
11	General governments	30,912	30,912		0			0			0				
12	Credit institutions	3,489	3,489		0			0			0				
13	Other fin. corporations	0	0		0			0			0				
14	Non-fin. corporations	3,350	3,350		0			0			0				
15	Off-balance-sheet exposures	149,663	148,173	1,490	50	0	50	-483	-483	0	0				
16	Central banks	0	0	0	0		0	0			0				
17	General governments	5	5	0	0		0	0			0				
18	Credit institutions	0	0	0	0		0	0			0				
19	Other financial corporations	5,331	5,331	0	0		0	0			0				
20	Non-financial corporations	114,753	113,370	1,382	46		46	-483	-483		0				
21	Households	29,574	29,467	108	4		4	0			0				
22	Total	2,307,173	2,247,652	53,505	14,872	0	14,576	-14,003	-10,053	-3,951	-5,031	0	-5,031	0	0

Template EU CQ7: Collateral obtained by taking possession and execution processes

As of the end of the reporting period, the Group has no collateral obtained by taking possession and execution processes

Template 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
		a	b	c	d	e
1	Loans and advances	452,173	1,663,858	1,656,678	7,180	0
2	Debt securities	37,751	0	0	0	0
3	Total	489,924	1,663,858	1,656,678	7,180	0
4	<i>Of which non-performing exposures</i>	371	9,421	9,135	286	0

Disclosure of liquidity coverage ratio and information on liquidity risk management

Disclosed information according to Annex XIII of the Commission delegated regulation (EL) nr 2021/637

Table EU LIQA - Liquidity risk management in accordance with Article 451a(4) CRR.

Strategies and processes in the management of the liquidity risk	The aim of the Group's liquidity management strategy is to ensure the timely and full fulfilment of the Group's obligations at all times, while optimizing liquidity risk so as to achieve maximum and stable profitability from investments of different durations. A more detailed overview of liquidity management is provided in the Group's annual report "Note 2 Risk Management" and its subchapter "Liquidity Risk Management".
Structure and organisation of the liquidity risk management function (authority, statute, other arrangements)	<p>The main liquidity management body is the Assets and Liabilities Management Committee (ALCO), whose functions and areas of responsibility in liquidity management are:</p> <ul style="list-style-type: none"> • planning the short-term and long-term liquidity of the group and planning and implementing the measures to be used; • analysis of information concerning the Group's assets and liabilities, interest income and expenses, liquidity and investment management and, if necessary, preparation of strategic decisions concerning liquidity management for the Management Board; • optimizing the maturity, profitability and liquidity ratio of the Group's assets and liabilities to achieve the Bank's strategic objectives; • regulation of the Group's required level of liquidity, acceptable interest rate risk and acceptable level of risk of changes in the value of assets and liabilities.
Scope and nature of liquidity risk reporting and measurement systems	<p>The Group's liquidity position is managed using the maturity analysis of assets and liabilities. The model also captures the main observable liquidity ratios and fixed-term ratios of assets and liabilities and liquidity stress tests are conducted. Limits have been set for all key liquidity ratios. The following indicators are used to measure liquidity risk:</p> <ul style="list-style-type: none"> • Liquidity Coverage Ratio (LCR); • survival period in a liquidity crisis situation; • concentration of financing; • the ratio of liquid assets to demand deposits; • the ratio of long-term liabilities to investments requiring stable financing.
Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants	The Group's liquidity policy is based on the principle of conservatism and the formed liquidity buffers are sufficient to cover the large-scale outflow of deposits. The Group has established a business continuity and recovery plan for dealing with liquidity crisis situations, which includes activities to cover cash flow deficits in emergency situations. In order to manage the liquidity position, the Group's Management Board has established an internal investment resource model that takes into account the ratio of issued loans and Resources involved. Different coefficients have been assigned to resources in the model, to the extent to which the respective resource can be used for lending activities. The Group diversifies the maturity of resources and avoids large concentrations of one counterparty.

A concise liquidity risk statement approved by the management body, succinctly describing the institution's overall liquidity risk profile associated with the business strategy. This statement includes key ratios and figures, providing external stakeholders with a comprehensive view of the institution's management of liquidity risk, (incl the risk profile of the institution and the risk tolerance set by the management body)

Liquidity risk management is an important part of the Group's overall risk management and planning process. The Group's risk appetite for liquidity risk is low, but due to the growth strategy, the Group's actual liquidity risk profile is higher than recommended. Therefore, the management actively and continuously monitors the free resource based on the internal investment resource model. The share of the Group's liquid assets in total assets as of 31.12.2024 was 17% (2023: 23%); the share of liquid assets in customer demand deposits 63% (2023:71%) and the share of demand deposits in total deposits was 30% (2023: 29%). The Management Board has established a system of early warning indicators to help identify an increase in risk or financing needs.

In thousands of euros

Template EU LIQ1 - Quantitative information of LCR (Scope of consolidation: (solo/consolidated))

Row number	Total adjusted value			
	31.03.2024	30.06.2024	30.09.2024	31.12.2024
EU-21	379,331	325,197	395,668	332,059
22	127,557	155,350	193,427	160,615
23	297%	209%	205%	207%

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