

MDB Group Limited

Pillar 3 disclosures report – Quarterly report  
30 September 2022

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## 1 Introduction

These Pillar 3 disclosures (the “Disclosures”) are in respect of MDB Group Limited (the “Regulatory Parent” or “MDB Holding”), and its subsidiaries, together referred to as the “Group” or “MDB Group”. The Group is regulated under the Single Supervisory Mechanism (“SSM”). The SSM is the system of banking supervision in Europe, the main aim of which is to ensure the safety and soundness of the European banking system and to increase financial integration, stability and consistency of supervision. Under the SSM, the Group is regulated by a Joint Supervisory Team comprising the European Central Bank (“ECB”), the National Bank of Belgium and the Malta Financial Services Authority (“MFSA”). The Group is classified as an “Other Systemically Important Institution”, and MeDirect Malta is considered a core domestic bank by the Central Bank of Malta.

The JST receives information on the capital adequacy requirements and sets capital requirements for the Group. At a consolidated Group level, capital is calculated for prudential regulatory reporting purposes using the Basel III framework of the Basel Committee on Banking Supervision (‘Basel’), as implemented by the European Union (‘EU’) in the revisions to the Capital Requirements Regulation.

The Basel III framework is structured around three ‘pillars’: the Pillar 1 minimum capital requirements, Pillar 2 in relation to supervisory review process, and Pillar 3, market discipline. The aim of Pillar 3 is to produce disclosures that allow market participants to assess the scope of banks’ application of the Basel Committee’s framework. It also aims to assess their application of the rules in their jurisdiction, their capital condition, risk exposures and risk management processes, and hence their capital adequacy.

These Disclosures have been prepared in accordance with the requirements of Part Eight of the EU Regulation 876/2019 of the European Parliament and of the Council of 20 May 2019 amending regulation (EU) No 575/2013 (Capital Requirements Regulation 2 – “CRR 2”). This quarterly Pillar 3 disclosures report provides the Pillar 3 disclosures which have a quarterly frequency assigned in line with the Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions.

MDB Holding’s subsidiary, MeDirect Malta has been authorised to waive its requirement to comply with Part Eight of the CRR on an individual basis, in terms of Article 6 (3) of the CRR. On the other hand MeDirect Belgium is exempt from full disclosure requirements laid down in Part Eight of the CRR, being a “small and non-complex” institution” it is required to publish the disclosure requirements as per Article 433b CRR on an annual basis.

Consistent with the banking regulations, these disclosures are not subject to external audit however the disclosures have been prepared on a basis consistent with information submitted to the regulator. These disclosures have been appropriately verified internally by the Group’s management, thus the Group is satisfied that internal verification procedures ensure that these Disclosures are presented fairly.

This document is not subject to external audit, however the disclosures have been prepared on a basis consistent with information submitted to the regulatory authorities. The Pillar 3 disclosures have been approved by the Group’s senior management. The Group is satisfied that internal verification procedures ensure that these Additional Regulatory Disclosures are presented fairly.

## 2 Key metrics

In the following table EU KM1 we provide key regulatory metrics and ratios as well as related input components as defined by the amended versions of CRR and CRD. They comprise own funds, RWAs, capital ratios, additional requirements based on SREP, capital buffer requirements, leverage ratio, liquidity coverage ratio and net stable funding ratio. They serve as high level metrics and form part of our holistic risk management across individual risk types in addition to the Group's specific internal risk metrics. Based on this they are fully integrated across strategic planning, risk appetite framework and stress testing concepts and are reviewed and approved by our Management Board at least annually.

### EU KM1 – Key metrics<sup>1</sup>

<i>Amounts in €millions</i>		30-Sep-22	30-Jun-22	31-Mar-22	31-Dec-21	30-Sep-21
<b>Available own funds</b>						
1	Common Equity Tier 1 (CET1) capital	203	188	204	213	227
2	Tier 1 capital	203	188	204	213	227
3	Total capital	250	240	252	260	273
<b>Risk-weighted exposure amounts</b>						
4	Total risk exposure amount	1,291	1,385	1,330	1,356	1,395
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>						
5	Common Equity Tier 1 ratio (%)	15.7%	13.6%*	15.4%	15.7%	16.2%
6	Tier 1 ratio (%)	15.7%	13.6%*	15.4%	15.7%	16.2%
7	Total capital ratio (%)	19.4%	17.3%*	19.0%	19.2%	19.6%
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3%	3%	3%	3%	3%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.7%	1.7%	1.7%	1.7%	1.7%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.3%	2.3%	2.3%	2.3%	2.3%
EU 7d	Total SREP own funds requirements (%)	11.0%	11.0%	11.0%	11.0%	11.0%
<b>Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)</b>						
8	Capital conservation buffer (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.0%	0.0%	0.0%	0.0%	0.0%
9	Institution specific countercyclical capital buffer (%)	0.08%	0.05%	0.04%	0.04%	0.03%
EU 9a	Systemic risk buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
10	Global Systemically Important Institution buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 10a	Other Systemically Important Institution buffer (%)	0.6%	0.6%	0.6%	0.5%	0.5%
11	Combined buffer requirement (%)	3.2%	3.2%	3.2%	3.0%	3.0%
EU 11a	Overall capital requirements (%)	14.2%	14.2%	14.2%	14.0%	14.0%
12	CET1 available after meeting the total SREP own funds requirements (%)	4.7%	5.3%	4.4%	4.7%	5.3%
<b>Leverage ratio</b>						
13	Total exposure measure	4,354	4,279	4,388	4,359	4,206
14	Leverage ratio (%)	4.7%	4.4%	4.7%	4.9%	5.4%
<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>						
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%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>						
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%
<b>Liquidity Coverage Ratio</b>						
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	733	828	798	815	791
EU 16a	Cash outflows - Total weighted value	337	354	348	340	322
EU 16b	Cash inflows - Total weighted value	94	92	116	121	128
16	Total net cash outflows (adjusted value)	243	263	232	219	194
17	Liquidity coverage ratio (%) <sup>2</sup>	307%	315%	344%	372%	407%
<b>Net Stable Funding Ratio</b>						
18	Total available stable funding	3,492	3,555	3,600	3,582	3,534
19	Total required stable funding	2,986	2,756	2,658	2,683	2,571
20	NSFR ratio (%)	117%	129%*	135%	134%	138%

<sup>1</sup> Capital ratios and risk-weighted exposure amounts have been prepared on an IFRS 9 transitional basis.

<sup>2</sup> The liquidity coverage ratio (LCR) uses the simple average of the preceding 12 monthly periods ending on the quarterly reporting date as specified in the table. The Actual LCR reported in June 2022 was 247%.

**FRS 9-FL: Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs**

		30-Sep-22	30-Jun-22	31-Mar-22	31-Dec-21	30-Sep-21
	Amounts in €millions					
	Available capital					
1	Common Equity Tier 1 (CET1) capital	203	188	204	213	227
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	201	186	202	208	222
3	Tier 1 capital	203	188	204	213	227
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	201	186	202	208	223
5	Total capital	250	240	252	260	273
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	248	238	250	256	269
	Risk-weighted assets					
7	Total risk-weighted assets	1,291	1,385	1,330	1,356	1,395
8	Total risk weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1,291	1,386	1,331	1,356	1,397
	Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	15.7%	13.6%	15.4%	15.7%	16.2%
10	Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.6%	13.4%	15.2%	15.4%	15.9%
11	Tier 1 (as a percentage of risk exposure amount)	15.7%	13.6%	15.4%	15.7%	16.2%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.6%	13.4%	15.2%	15.4%	15.9%
13	Total capital (as a percentage of risk exposure amount)	19.4%	17.3%	19.0%	19.2%	19.6%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.2%	17.2%	18.8%	18.9%	19.3%
	Leverage ratio					
15	Leverage ratio total exposure measure (€millions)	4,354	4,279	4,388	4,359	4,206
16	Leverage ratio	4.7%	4.4%	4.7%	4.9%	5.4 %
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4.6%	4.3%	4.6%	4.8%	5.3%

As laid down in Regulation (EU) 2017/2395 and amended by Regulation (EU) 2020/873, the Group has opted to apply the transitional arrangements laid down in the same regulation to mitigate the impact of the introduction of IFRS 9 on own funds. Thus, during the transitional period ending 31 December 2024, the Group will be adding back a proportion of:

- (a) the Day 1 impact as a result of the introduction of IFRS 9, being the difference between IFRS 9 expected credit losses ("ECLs") on 1 April 2018 and IAS 39 provisions determined at 31 March 2018; and
- (b) the difference in the IFRS 9 ECLs determined as at 31 December 2019 and the ECLs determined on 'day 1' of the introduction of IFRS 9 (being 1 April 2018 for the Group) for Stage 1 (12-months ECLs) and Stage 2 (lifetime ECLs) assets; and
- (c) the difference in the IFRS 9 ECLs determined at reporting date and the ECLs determined as at 1 January 2020 for Stage 1 (12-months ECLs) and Stage 2 (lifetime ECLs) assets.

Two sets of factors are used to adjust the above ECLs which will decline across the transitional period. The first set of factors, applicable to (a) and (b) above, started at 95% during the financial year ended 31 March 2019 and will fall to 25% in the final transitional year ending 31 December 2023. The second set of factors, applicable to (c) above, start at 100% during the financial years ended 31 December 2020 and 31 December 2021 and will fall down to 25% during the final transitional year ending 31 December 2024.

The above treatment is in accordance with the requirements laid down in paragraphs 6 and 6a of Regulation (EU) 2017/2395, as amended by Regulation (EU) 2020/873.

The Group has also chosen to apply the calculation referred to paragraph 7a of Regulation (EU) 2017/2395, as amended by Regulation (EU) 2020/873, whereby instead of reducing the specific credit risk adjustments by an accordingly calculated factor, the Group will instead risk weight the relevant amount at 100% and add it the total risk weighted exposure amount.

As noted in template IFRS 9-FL above, the impact of the transitional arrangement on the Group's capital ratio as at 31 March 2022 amounted to 15 bps at the reporting period under review. This was a result of an add-back in capital of €2 million and a reduction of €0.4 million in risk-weighted assets. Similarly, the Group's leverage ratio is 5 bps greater in view of the transitional arrangement applied.

Further to the amending Regulation (EU) 2020/873, and as required to be disclosed by EBA Guidelines (EBA/GL/2020/12), the Group chose not to apply the temporary treatment relating to unrealised gains and losses measured at fair value through other comprehensive income, as per Article 468.

### 3 Capital requirements

Capital requirements represent the amount of capital resources that a bank must hold as required by the regulator. In line with CRR, the Group continuously monitors its Common Equity Tier 1 capital.

The scope of permissible CRR approaches and those adopted by the Group are described below.

- **Credit risk** – The Group calculates its risk weighted credit risk exposure in accordance with the Standardised Approach, described in Chapter 2 of Title II of Part Three of the CRR. To calculate the risk-weighted exposure amounts, risk weights are applied based on the exposure class and the related credit quality. Credit quality may be determined by reference to the credit assessments of ECAs that have been determined as eligible by the EBA. In the Group's calculations, senior secured loans and other corporate credit exposures are assigned risk weights corresponding to unrated positions and for the remainder of its securities investment portfolio the Group has nominated well-known risk rating agencies such as Fitch, Standard and Poor's and Moody's. Accordingly, the Group complies with the standard association of the external ratings of ECAs with the credit quality steps prescribed in CRR.
- **Operational risk** – The Group calculates its capital requirement using the Basic Indicator Approach, in terms of Article 315 of the CRR. The own funds requirement amounts to 15% of the average three years of the relevant indicator, as defined in Article 316 of the CRR. Elements within the relevant indicator include interest receivable and similar income, interest payable and similar charges, income from shares and other variable/fixed-yield securities, commissions and fees receivable/payable, net profit or net loss on financial operations and other operating income, adjusted for, amongst others stipulated in the CRR, profits on sale of non-trading book items and extraordinary or irregular items.
- **Counterparty credit risk** – The Group adopted the original exposures method for the counterparty credit risk as defined in Article 282 of CRR 2. This takes into consideration the netting arrangements in place while accounting for potential future changes. This netting process reduces the credit risk and settlement risk to a single net claim on the party to the contract.
- **Foreign exchange risk** – The Group has adopted the basic method to determine its foreign exchange risk requirement in accordance with Article 351 of the CRR. In terms of this Article, the Group does not calculate the capital requirement for foreign exchange risk as its net foreign exchange position is less than 2% of its own funds.
- **Credit valuation adjustment risk** – The Group uses the standardised approach, as per Article 384 of the CRR.

The following table provides an overview of the total RWA and the capital requirement for credit risk, derived from the RWA by an 8% capital ratio, split by the different exposure classes as well as capital for operational risk, foreign exchange risk and credit valuation adjustment risk. No capital is allocated for market risk as the Group does not operate a trading book. The Group has no exposure in items representing securitisation positions. Moreover, the capital allocated to settlement risk and commodities risk is nought. The exposure value is equal to the total on-balance sheet and off-balance sheet net of value adjustments and provisions and post CCF.

#### EU OV1 – Overview of total risk exposure amounts

Amounts in €millions

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		30 September 2022	30 June 2022	30 September 2022
1	Credit risk (excluding CCR)	1,063	1,159	85
2	Of which the standardised approach	1,063	1,159	85
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU 4a	Of which equities under the simple risk weighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk – CCR	15	17	1
7	Of which the standardised approach	-	-	-
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	15	14	1
EU 8b	Of which credit valuation adjustment – CVA	-	1	-
9	Of which other CCR	-	2	-
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	104	101	8
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	104	101	8
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	-	-	-
21	Of which the standardised approach	-	-	-
22	Of which IMA	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	109	109	9
EU 23a	Of which basic indicator approach	109	109	9
EU 23b	Of which standardised approach	-	-	-
EU 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	12	42	1
<b>29</b>	<b>Total</b>	<b>1,291</b>	<b>1,385</b>	<b>103</b>

## 4 Liquidity

The Liquidity Coverage Ratio (LCR) requires credit institutions to promote short-term resilience to potential liquidity disruptions thereby eliminating, or significantly reducing, structural mismatches between assets and liabilities. In terms of LCR requirements, credit institutions must hold sufficient unencumbered high quality liquid assets (HQLA) to withstand the excess of severe liquidity outflows over inflows that could be expected to accumulate over a 30-day stressed period. During such a period, a credit institution should be able to quickly convert its liquid assets into cash without recourse to central bank liquidity or public funds. The Bank calculates and monitors the LCR on a daily basis.

The Group has in place a number of quantitative risk appetite metrics to be able to monitor liquidity risk including the LCR and the NSFR. At all times, the Group ensures that it is compliant with these regulatory requirements. The following table provides an analysis of the data points used in the calculation of the liquidity coverage ratio.

As at Q1 2022 and Q2 to Q4 2021, the Group's LCR was well above both the regulatory minimum and the risk appetite set by the Group.

### EU LIQ1: Quantitative information of LCR

		a	b	c	d	e	f	g	h
	<i>Amounts in €millions</i>	Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on:	30 September 2022	30 June 2022	31 March 2022	31 December 2021	30 September 2022	30 June 2022	31 March 2022	31 December 2021
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
1	Total high-quality liquid assets (HQLA)	X				733	828	798	815
<b>CASH – OUTFLOWS</b>									
2	Retail deposits and deposits from small business customers, of which:	2,594							
3	<i>Stable deposits</i>	2	2,584	2,541	2,481	186	181	173	163
4	<i>Less stable deposits</i>	1,848	1,795	1,714	1,616	186	181	172	163
5	Unsecured wholesale funding	136	186	187	182	55	76	76	73
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	-	-	-	-	-	-	-	-
7	<i>Non-operational deposits (all counterparties)</i>	136	186	187	182	55	76	76	73
8	<i>Unsecured debt</i>								
9	<i>Secured wholesale funding</i>	X				2	2	10	13
10	Additional requirements	301	312	329	356	82	80	75	76
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	29	32	30	28	29	32	30	28
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-	-	-	-	-
13	<i>Credit and liquidity facilities</i>	272	280	299	327	52	48	46	48
14	Other contractual funding obligations	17	22	20	20	12	16	15	14
15	Other contingent funding obligations	-	-	-	-	-	-	-	-
16	TOTAL CASH OUTFLOWS	X				337	354	348	340
<b>CASH – INFLOWS</b>									
17	Secured lending (e.g. reverse repos)	3	8	8	15	3	8	6	9
18	Inflows from fully performing exposures	68	73	94	95	62	69	91	92
19	Other cash inflows	33	19	25	25	29	15	20	20
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)	X				-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)	X				-	-	-	-
20	TOTAL CASH INFLOWS	103	100	127	135	94	92	116	121
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-	-	-	-	-
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-	-	-	-	-
EU-20c	<i>Inflows subject to 75% cap</i>	103	100	127	135	94	92	116	121
<b>TOTAL ADJUSTED BUFFER</b>									
EU-21	LIQUIDITY BUFFER	X				733	828	798	815
22	TOTAL NET CASH OUTFLOWS	X				243	263	232	219
23	LIQUIDITY COVERAGE RATIO	X				307%	325%	344%	372%