MDB Group Limited

Pillar 3 disclosures report – Quarterly report
31 March 2026

Attestation by management

The undersigned Owen Camilleri, in his capacity as Chief Accounting Officer, charged with preparing the MDB Group Pillar 3 disclosures report declares that this Pillar 3 disclosures report as at 31 March 2026, to the best of his knowledge, complies with Part Eight of the CRR, including, where relevant, any associated EBA guidelines and technical standards, and has been prepared in compliance with the Group's internal governance process including formal policies, internal processes and systems and internal control environment.

Owen Camilleri
Chief Accounting Officer

22 July 2026

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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) 2024/3172 of 29 November 2024 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.

Comparative disclosures (i.e. June, March, December and September) across all templates has been reported in accordance with CRR II requirements. The Pillar 3 disclosures have been prepared in accordance with the CRR III regulatory requirements.

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

Amounts in €millions		a. T	b. T-1	c. T-2	d. T-3	e. T-4
		31-Mar-26	31-Dec-25	30-Sep-25	30-Jun-25	31-Mar-25
Available own funds (amounts)						
1. Common Equity Tier 1 (CET1) capital		240	248	247	214	213
2. Tier 1 capital		240	248	247	214	213
3. Total capital		271	281	282	255	253
Risk-weighted exposure amounts						
4. Total risk-weighted exposure amount		1,210	1,193	1,193	1,261	1,196
4a. Total risk exposure amount pre-floorg		1,210	1,193	1,193	1,261	1,196
Capital ratios (as a percentage of risk-weighted exposure amount)						
5. Common Equity Tier 1 ratio (%)		19.8%	20.8%	20.7%	17.0%	17.8%
5b. Common Equity Tier 1 ratio considering unfloored TREA (%)		19.8%	20.8%	20.7%	17.0%	17.8%
6. Tier 1 ratio (%)		19.8%	20.8%	20.7%	17.0%	17.8%
6b. Tier 1 ratio considering unfloored TREA (%)		19.8%	20.8%	20.7%	17.0%	17.8%
7. Total capital ratio (%)		22.4%	23.5%	23.6%	20.2%	21.1%
7b. Total capital ratio considering unfloored TREA(%)		22.4%	23.5%	23.6%	20.2%	21.1%
Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)						
EU 7d. Additional own funds requirements to address risks other than the risk of excessive leverage (%)		3.4%	3.4%	3.4%	3.4%	3.2%
EU 7e. of which: to be made up of CET1 capital (percentage points)		1.9%	1.9%	1.9%	1.9%	1.8%
EU 7f. of which: to be made up of Tier 1 capital (percentage points)		2.6%	2.6%	2.6%	2.6%	2.4%
EU 7g. Total SREP own funds requirements (%)		11.4%	11.4%	11.4%	11.4%	11.2%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
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 (%)		1.01%	0.98%	1.02%	1.07%	1.09%
EU 9a. Systemic risk buffer (%)		0.03%	0.03%	0.03%	0.03%	0.03%
10. Global Systemically Important Institution buffer (%)		0.0%	0.0%	0.0%	0.0%	0.0%
EU 10a. Other Systemically Important Institution buffer (%)		1.0%	1.0%	1.0%	1.0%	1.0%
11. Combined buffer requirement (%)		4.5%	4.5%	4.6%	4.6%	4.6%
EU 11a. Overall capital requirements (%)		15.9%	15.9%	16.0%	16.0%	15.8%
12. CET1 available after meeting the total SREP own funds requirements (%)		11.0%	12.1%	12.1%	8.4%	9.4%
Leverage ratio						
13. Total exposure measure		5,255	5,186	5,105	4,990	4,942
14. Leverage ratio (%)		4.6%	4.8%	4.8%	4.3%	4.3%
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%	0.0%	0.0%	0.0%	0.0%
EU 14b. of which: to be made up of CET1 capital (percentage points)		0.0%	0.0%	0.0%	0.0%	0.0%
EU 14c. Total SREP leverage ratio requirements (%)		3.0%	3.0%	3.0%	3.0%	3.0%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d. Leverage ratio buffer requirement (%)		0.0%	0.0%	0.0%	0.0%	0.0%
EU 14e. Overall leverage ratio requirement (%)		3.0%	3.0%	3.0%	3.0%	3.0%
Liquidity Coverage Ratio						
15. Total high-quality liquid assets (HQLA) (Weighted value -average)		903	879	857	850	836
EU 16a. Cash outflows - Total weighted value		547	546	551	524	499
EU 16b.Cash inflows - Total weighted value		51	51	63	63	67
16. Total net cash outflows (adjusted value)		496	495	488	461	432
17. Liquidity coverage ratio (%)[1]		182%	178%	176%	186%	196%
Net Stable Funding Ratio						
18. Total available stable funding		4,319	4,378	4,238	4,271	4,251
19. Total required stable funding		3,358	3,284	3,374	3,497	3,559
20. NSFR ratio (%)		129%	133%	126%	122%	119%

In September 2025 the Banka Creditas Group made a capital contribution to the MeDirect Group amounting to €39.2 million. Subsequent to the reference date, in June 2026, Banka Creditas Group made a further capital contribution to the MeDirect Group amounting to €25 million.

[1] The 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 March 2026 was 190%.

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 ECAIs 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 and the ABS portfolio the Group has nominated a well-known risk rating agency. Accordingly, the Group complies with the standard association of the external ratings of ECAIs with the credit quality steps prescribed in CRR.

- Operational risk – The Group calculates its capital requirement using the Standardised Approach, in terms of Article 312 of the CRR. The own funds requirement is the BIC, which is derived from the Business Indicator (BI), which serves as a proxy for the institution's operational risk exposure. The BI is calculated as the average over three years of three key components:

    - Interest, Leasing and Dividend Component (ILDC): Includes NII, lease income, and dividend income.

    - Services Component (SC): Reflects fee and commission income and expenses, and other service-related revenues and costs.

    - Financial Component (FC): Captures the institution's trading and fair value gains/losses, and other financial income.

  Each component is calculated using specific line items from the Group's audited financial statements, adjusted to align with regulatory definitions.

- CCR – As at the reporting date, the Group reported the CCR calculations for derivatives using the - Simplified SA-CCR Method (as defined in CRR, Article 281) and the financial collateral simple approach for SFTs.

- Foreign exchange risk – The Group has adopted the Basic Method to determine its FX risk requirement in accordance with Article 351 of the CRR. In terms of this Article, the Group does not calculate the capital requirement for FX risk as its net FX position is less than 2% of its own funds.

- CVA risk – The Group uses the reduced basic 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. T	b. T-1	c. T
		31 March 2026	31 December 2025	31 March 2026
1. Credit risk (excluding CCR)		988	976	79
2. Of which the standardised approach		988	976	79
3. Of which the Foundation IRB (F-IRB) approach		-	-	-
4.Of which slotting approach		-	-	-
EU4a.Of which: equities under the simple risk weighted approach		-	-	-
5. Of which the Advanced IRB (A-IRB) approach		-	-	-
6. Counterparty credit risk – CCR		11	12	1
7. Of which the standardised approach		-	-	-
8. Of which internal model method (IMM)		-	-	-
EU 8a. Of which exposures to a CCP		11	11	1
9. Of which other CCR		-	-	-
10. Credit valuation adjustments risk - CVA risk		-	-	-
EU 10a. Of which the standardised approach		-	-	-
EU 10b. Of which the basic approach (F-BA and R-BA)		-	-	-
EU 10c. Of which the simplified approach		-	-	-
11. Not applicable		-	-	-
12. Not applicable		-	-	-
13. Not applicable		-	-	-
14. Not applicable		-	-	-
15. Not applicable		-	-	-
16. Securitisation exposures in the non-trading book (after the cap)		80	75	6
17. Of which SEC-IRBA approach		-	-	-
18. Of which SEC-ERBA (including IAA)		12	6	-
19. Of which SEC-SA approach		68	69	5
EU 19a. Of which 1250% deduction		-	-	-
20. Position, foreign exchange and commodities risks (Market risk)		-	-	-
21. Of which the Alternative standardised approach (A-SA)		-	-	-
EU 21a. Of which the Simplified standardised approach (S-SA)		-	-	-
22. Of which the Alternative Internal Models Approach (A-IMA)		-	-	-
EU 22a. Large exposures		-	-	-
23. Reclassifications between the trading and non-trading books		-	-	-
24. Operational risk		131	131	10
25. Amounts below the thresholds for deduction (subject to 250% risk weight)		9	15	1
26. Output floor applied (%)		-	-	-
27. Floor adjustment (before application of transitional cap)		-	-	-
28. Floor adjustment (after application of transitional cap)		-	-	-
29. Total		**1,210**	**1,193**	**97**

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.

EU LIQ1: Quantitative information of LCR

Amounts in €millions	Total unweighted value (average)				Total weighted value (average)			
	a. T	b. T-1	c. T-2	d. T-3	e. T	f. T-1	g. T-2	h. T-3
EU 1a. Quarter ending on:	31 December 2025	30 September 2025	30 June 2025	31 March 2025	31 December 2025	30 September 2025	30 June 2025	31 March 2025
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)					903	879	857	850
CASH – OUTFLOWS								
2. Retail deposits and deposits from small business customers, of which:	3,825	3,737	3,664	3,577	350	339	328	312
3. Stable deposits	83	45	9	8	4	2	-	-
4. Less stable deposits	3,220	3,148	3,075	2,970	346	337	328	312
5. Unsecured wholesale funding	138	141	147	144	73	79	86	81
6. Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-	-	-	-	-
7. Non-operational deposits (all counterparties)	138	141	147	144	*73*	*79*	*86*	*81*
8. Unsecured debt	-	-	-	-	-	-	-	-
9. Secured wholesale funding					7	10	9	7
10. Additional requirements	251	257	248	235	89	90	91	87
11. Outflows related to derivative exposures and other collateral requirements	*49*	*53*	*55*	*51*	*49*	*53*	*55*	*51*
12. Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13. Credit and liquidity facilities	*202*	*204*	*194*	*184*	*39*	*37*	*36*	*35*
14. Other contractual funding obligations	33	33	43	43	27	27	37	37
15. Other contingent funding obligations	-	-	-	-	-	-	-	-
16. TOTAL CASH OUTFLOWS					547	546	551	524
CASH – INFLOWS								
17. Secured lending (e.g. reverse repos)	-	-	1	1	-	-	1	1
18. Inflows from fully performing exposures	54	54	64	60	50	51	61	57
19. Other cash inflows	3	3	4	8	1	1	2	6
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	56	57	69	69	51	51	63	63
EU-20a. Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b. Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c. *Inflows subject to 75% cap*	56	57	69	69	51	51	63	63
TOTAL ADJUSTED BUFFER								
21. LIQUIDITY BUFFER					903	879	857	850
22. TOTAL NET CASH OUTFLOWS					496	495	488	461
23. LIQUIDITY COVERAGE RATIO					182%	178%	176%	186%

The Group calculates additional liquidity outflows corresponding to collateral needs resulting from the impact of an adverse market scenario on the Group's derivative transactions using the Historical Look Back Approach (HLBA) as guided by the EBA. In preparing the LCR, the Group recognises restrictions on the transferability of liquidity between jurisdictions with surplus liquid assets in one jurisdiction not transferable to another jurisdiction.

EU LIQB - Qualitative information on LCR disclosures.

The Group's intention going forward is to remain mainly deposit funded as it gives more long-term stability to the Group. In 2020, the Group entered into its diversification strategy by adding on balance sheet securitisation as part of the funding plan of the new asset class - Nationale Hypotheek Garantie ("NHG") mortgages, as well as developing a broader range of wholesale funding options for contingency funding capacity. MeDirect Belgium has in place three Dutch residential mortgages securitisations to serve as a long-term funding source. Other funding sources such as repo facilities and third-party warehouse lines on mortgages may also be used as bridging instruments to deposits or securitisation in the short to medium-term. The Group considers bilateral repurchase agreements (i.e. not executed via Eurex) and central bank facilities as alternative sources of funding, which are not intended to be utilised extensively under business-as-usual conditions.

The Group establishes a funding strategy that provides effective diversification in the sources and tenor of funding. The Group diversifies available funding sources in the short-, medium- and long-term as part of its funding plan, in conjunction with its budgeting and planning processes. The Group's funding plan takes into account correlations between sources of funds and market conditions.

The Group's funding strategy for business-as-usual activities is facilitated by maintaining a positive funding gap and by monitoring the Group's maturity ladder, which is used by the Group to determine the availability of liquid assets to meet the liquidity gaps across a range of time buckets. The Group ensures it maintains a significant buffer of HQLAs that can be readily converted into cash or are eligible to be pledged as collateral in order to raise wholesale repo funding to meet liabilities as they fall due. Additionally, the Group may choose to widen the composition of its contingency buffer to hold other unencumbered liquid assets which can be sold or used as collateral without resulting in excessive losses or discounts.

As at 30 September 2025, the Group's LCR was well above both the regulatory minimum requirement.

Annex – Non-applicable disclosures

Table reference	Table name	Reason
EU CMS1	Comparison of modelled and standardised risk weighted exposure amounts at risk level	MeDirect does not apply internal models
EU CMS2	Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level	MeDirect does not apply internal models
EU CR8	RWEA flow statements of credit risk exposures under the IRB approach	MeDirect does not apply the IRB approach
EU CCR7	RWA flow statements of CCR exposures under the IMM	MeDirect does not apply the IMM approach
EU MR2-B	RWA flow statements of market risk exposures under the IMA	MeDirect does not apply the IMA approach
EU CVA4	RWEA flow statements of credit valuation adjustment risk under the Standardised Approach	MeDirect does not apply the Standardised Approach