

### **Pillar 3 Report**

#### **AIB Group plc**

#### **Table of Contents**

**Forward Looking Statement** 

Introduction

Chapter 1. Disclosure of key metrics and overview of risk-weighted exposure amounts

- 1: Template EU KM1 Key metrics template
- 2: Template EU KM2: Key metrics MREL and, where applicable, G-SII requirement for own funds and eligible liabilities
- 3: Template EU OV1 Overview of total risk exposure amounts
- 4: Table EU OVC ICAAP information
- 5: Template EU TLAC1 Composition MREL and, where applicable, G-SII requirement for own funds and eligible liabilities
- 6: Template EU TLAC3b creditor ranking resolution entity

Chapter 2. Disclosure of risk management objectives and policies

- 7: Table EU OVA Institution risk management approach
- 8: Table EU OVB Disclosure on governance arrangements

Chapter 3. Disclosure of the scope of application

- 9: Template EU LI1 Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories
- 10: Template EU LI2 Main sources of differences between regulatory exposure amounts and carrying values in financial statements
- 11: Template EU LI3 Outline of the differences in the scopes of consolidation (entity by entity)
- 12: Table EU LIA Explanations of differences between accounting and regulatory exposure amounts
- 13: Table EU LIB Other qualitative information on the scope of application
- 14: Template EU PV1 Prudent valuation adjustments (PVA)

Chapter 4. Disclosure of own funds

- 15: Template EU CC1 Composition of regulatory own funds
- 16: Template EU CC2 reconciliation of regulatory own funds to balance sheet in the audited financial statements
- 17: Table EU CCA Main features of regulatory own funds instruments and eligible liabilities instruments Chapter 5. Disclosure of countercyclical capital buffers
- 18: Template EU CCyB1 Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer
- 19: Template EU CCyB2 Amount of institution-specific countercyclical capital buffer

Chapter 6. Disclosure of the leverage ratio

- 20: Template EU LR1 LRSum: Summary reconciliation of accounting assets and leverage ratio exposures
- 21: Template EU LR2 LRCom: Leverage ratio common disclosure
- 22: Template EU LR3 LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)
- 23: Table EU LRA Disclosure of LR qualitative information

Chapter 7. Disclosure of liquidity requirements

- 24: Table EU LIQA Liquidity risk management
- 25: Template EU LIQ1 Quantitative information of LCR
- 26: Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1
- 27: Template EU LIQ2 Net Stable Funding Ratio

#### Chapter 8. Disclosure of exposures to credit risk, dilution risk and credit quality

- 28: Table EU CRA General qualitative information about credit risk
- 29: Table EU CRB Additional disclosure related to the credit quality of assets
- 30: Template EU CR1 Performing and non-performing exposures and related provisions
- 31: Template EU CR1-A Maturity of exposures
- 32: Template EU CR2 Changes in the stock of non-performing loans and advances
- 33: Template EU CQ1 Credit quality of forborne exposures
- 34: Template EU CQ3 Credit quality of performing and non-performing exposures by past due days
- 35: Template EU CQ4 Quality of non-performing exposures by geography
- 36: Template EU CQ5 Credit quality of loans and advances to non-financial corporations by industry
- 37: Template EU CQ7 Collateral obtained by taking possession and execution processes

Chapter 9. Disclosure of the use of credit risk mitigation techniques

- 38: Table EU CRC Qualitative disclosure requirements related to CRM techniques
- 39: Template EU CR3 CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

#### Chapter 10. Disclosure of the use of the standardised approach

- 40: Table EU CRD Qualitative disclosure requirements related to standardised approach
- 41: Template EU CR4 Standardised approach Credit risk exposure and CRM effects
- 42: Template EU CR5 Standardised approach

#### Chapter 11. Disclosure of use of the IRB approach to credit risk

- 43: Table EU CRE Qualitative disclosure requirements related to IRB approach
- 44: Template EU CR6 IRB approach Credit risk exposures by exposure class and PD range
- 45: Template EU CR6-A Scope of the use of IRB and SA approaches
- 46: Template EU CR7 IRB approach Effect on the RWEAs of credit derivatives used as CRM techniques
- 47: Template EU CR7-A IRB approach Disclosure of the extent of the use of CRM techniques
- 48: Template EU CR8 RWEA flow statements of credit risk exposures under the IRB approach
- 49: Template EU CR9 IRB approach Back-testing of PD per exposure class (fixed PD scale)
- 50: Template EU CR9.1 IRB approach Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)

#### Chapter 12. Disclosure of exposures to counterparty credit risk

- 51: Table EU CCRA Qualitative disclosure related to CCR
- 52: Template EU CCR1 Analysis of CCR exposure by approach
- 53: Template EU CCR2 Transactions subject to own funds requirements for CVA risk
- 54: Template EU CCR3 Standardised approach CCR exposures by regulatory exposure class and risk weights
- 55: Template EU CCR4 IRB approach CCR exposures by exposure class and PD scale
- 56: Template EU CCR5 Composition of collateral for CCR exposures
- 57: Template EU CCR6 Credit derivatives exposures
- 58: Template EU CCR8 Exposures to CCPs

#### Chapter 13. Disclosure of exposures to securitisation positions

- 59: Table EU SECA Qualitative disclosure requirements related to securitisation exposures
- $60\mbox{:}\ \mbox{Template EU SEC1}\mbox{-}\mbox{Securitisation exposures in the non-trading book}$
- 61: Template EU SEC3 Securitisation exposures in the non-trading book and associated regulatory capital requirements institution acting as originator or as sponsor
- 62: Template EU SEC4 Securitisation exposures in the non-trading book and associated regulatory capital requirements institution acting as investor

#### Chapter 14. Disclosure of the use of standardised approach for market risk

63: Table EU MRA - Qualitative disclosure requirements related to market risk

64: Template EU MR1 - Market risk under the standardised approach

Chapter 15. Disclosure of operational risk

65: Table EU ORA - Qualitative information on operational risk

66: Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

Chapter 16. Disclosure of exposures to interest rate risk on positions not held in the trading book

67: Table EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities

68: Template EU IRRBB1 - Interest rate risks of non-trading book activities

Chapter 17. Disclosure of remuneration policy

69: Table EU REMA - Remuneration policy

70: Template EU REM1 - Remuneration awarded for the financial year

71: Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

72: Template EU REM3 - Deferred remuneration

73: Template EU REM4 - Remuneration of 1 million EUR or more per year

74: Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

Chapter 18. Disclosure of encumbered and unencumbered assets

75: Template EU AE1 - Encumbered and unencumbered assets

76: Template EU AE2 - Collateral received and own debt securities issued

77: Template EU AE3 - Sources of encumbrance

78: Table EU AE4 - Accompanying narrative information

Chapter 19. Disclosure of environmental, social and governance risks (ESG risks)

79: Table 1 - Qualitative information on Environmental risk

80: Table 2 - Qualitative information on Social risk

81: Table 3 - Qualitative information on Governance risk

82: Template 1 - Banking book - Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

83: Template 2 - Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

84: Template 3 - Banking book - Indicators of potential climate change transition risk: Alignment metrics

85: Template 4 - Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms

86: Template 5 - Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk

87: Template 6 - Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures

88: Template 7 - Mitigating actions: Assets for the calculation of GAR

89: Template 8 - GAR (%)

90: Template 10 - Other climate change mitigating actions that are not covered in the EU Taxonomy CRR Roadmap

#### **Forward Looking Statement**

This document contains certain forward looking statements with respect to the financial condition, results of operations and business of AIB Group and certain of the plans and objectives of the Group. These forward looking statements can be identified by the fact that they do not relate only to historical or current facts. Forward looking statements sometimes use words such as 'aim', 'anticipate', 'target', 'expect', 'estimate', 'intend', 'plan', 'goal', 'believe', 'may', 'could', 'will', 'seek', 'continue', 'should', 'assume', or other words of similar meaning. Examples of forward looking statements include, among others, statements regarding the Group's future financial position, capital structure, Government shareholding in the Group, income growth, loan losses, business strategy, projected costs, capital ratios, estimates of capital expenditures, and plans and objectives for future operations. Because such statements are inherently subject to risks and uncertainties, actual results may differ materially from those expressed or implied by such forward looking information. By their nature, forward looking statements involve risk and uncertainty because they relate to events and depend on circumstances that will occur in the future. There are a number of factors that could cause actual results and developments to differ materially from those expressed or implied by these forward looking statements. These are set out in the Principal risks on pages 17 to 20 in the 2024 Annual Financial Report. In addition to matters relating to the Group's business, future performance will be impacted by the Group's ability along with governments and other stakeholders to measure, manage and mitigate the impacts of climate change effectively. Future performance could also be impacted by geopolitical tensions and global conflict. Any forward looking statements made by or on behalf of the Group speak only as of the date they are made. The Group cautions that the list of important factors on pages 17 to 20 of the 2024 Annual Finan

#### Introduction

This document contains the required regulatory disclosures under Capital Requirements Regulation ("CRR"), Part Eight – Disclosures by Institutions and is prepared in compliance with Regulation (EU) 2021/637.

#### **Basis of disclosures**

AIB Group plc ('the parent company') is a company domiciled in Ireland and is the holding company of the Group (LEI code: 635400AKJBGNS5WNQL34).

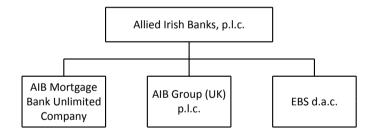
Under Article 4 (1) (29) of the CRR, AIB Group plc is an EU parent institution. Under Article 13 (1) of the CRR, disclosure obligations as laid down in Part Eight of the CRR are on the basis of the consolidated situation of the EU parent institution (i.e. AIB Group plc).

Allied Irish Banks, p.l.c., a direct subsidiary of AIB Group plc, is a credit institution authorised by the Central Bank of Ireland ("CBI")/Single Supervisory Mechanism ("SSM") (LEI code: 3U8WV1YX2VMUHH7Z1Q21). Allied Irish Banks, p.l.c. and its subsidiaries: AIB Mortgage Bank Unlimited Company and EBS d.a.c. are licenced entities and are required to file regulatory returns with the CBI for the purpose of assessing their capital adequacy. In addition, AIB Group (UK) p.l.c., also a subsidiary of Allied Irish Banks, p.l.c., is a licenced entity and files regulatory returns with the Prudential Regulatory Authority ("PRA"). Goodbody Stockbrokers Unlimited Company ("Goodbody") is a subsidiary of Allied Irish Banks, p.l.c. Goodbody is supervised per the Investment Firms Regulation ("IFR") on an individual basis and is included in Group consolidated supervision under CRR.

AIB Group plc and its subsidiaries (collectively "AIB Group" or "Group") prepares consolidated financial statements ("consolidated accounts") in accordance with International Accounting Standards and International Financial Reporting Standards (collectively 'IFRSs') as adopted by the EU. Not all subsidiary entities are included in the scope of regulatory consolidation, Semeral Limited and Payzone Ireland Limited are fully consolidated for accounting purposes and neither consolidated nor deducted for regulatory purposes.

The Pillar 3 disclosures provide detail of how the Group has prepared and disclosed capital requirements and information about the management of certain risks as at 31 December 2024 and for no other purpose. They do not constitute any form of financial statement and should not be relied upon exclusively in making any judgement on the Group. They should be read in conjunction with the other information made public by AIB Group and available on the AIB Group website, including the Annual Financial Report for the financial year ended 31 December 2024.

#### Licensed banks within AIB Group as at 31 December 2024



#### Large subsidiary

Subsidiaries are not required to comply with Pillar 3 disclosures per Article 6, however, large subsidiaries are required to disclose certain information per Article 13(1). A review of the licensed subsidiaries is carried out quarterly to determine if they meet the definition of a large subsidiary. The only large subsidiary in AIB Group at 31 December 2024 is Allied Irish Banks, p.l.c. Large subsidiaries shall disclose all the information required per Article 13(1) on an annual basis and the required information on a semi-annual and quarterly basis. Allied Irish Banks, p.l.c. disclosures for 31 December 2024 are also available at https://aib.ie/investorrelations.

#### **Reporting conventions**

Where disclosures have been enhanced, or are new, they are generally not restated or comparatives provided. Wherever specific rows and columns in the tables and templates prescribed by the EBA are not applicable to our activities, they are left blank. Comparisons against prior periods have been included in the templates as required by Regulation (EU) 2021/637 and by the Bank Recovery and Resolution Directive (BRRD) 2014/59/EU.

This Pillar 3 disclosure is reported in Euro millions for the reference date 31 December 2024 and the reference period 1 January 2024 to 31 December 2024.

Due to rounding, numbers presented throughout this document may not add up precisely to the totals provided and percentages may not precisely reflect the absolute figures.

At December 2024 numbers were presented on a Fully Loaded basis. From June 2024 the Group elected to cease the application of transitional capital arrangements and as a result the capital position is on a fully loaded basis from June 2024 onwards.

#### **Attestation**

The Group has formal policies and internal processes, systems and controls in place to comply with the disclosure requirements under CRR. Specific governance committees are responsible for reviewing the Group's Pillar 3 disclosures and ensuring that they have been subject to adequate verification and comply with applicable standards and legislation.

"I confirm that AIB Group's Pillar 3 disclosures, to the best of my knowledge, comply with Part Eight of the CRR and have been prepared in compliance with AIB Group's internal control framework".

This report has been attested by:

Chief Financial Officer and Member of the Board of AIB Group Donal Galvin

Chapter 1. Disclosure of key metrics an	nd overview of risk-weighte	d exposure amounts

#### 1: Template EU KM1 - Key metrics template

As per Article 447, points (a) to (g) and Article 438, point (b) the following template provides a summary of the main prudential and regulatory information and ratios covered by the CRR. Transitional and fully loaded capital ratios are aligned from June 2024<sup>1</sup>, prior periods were transitional. It also includes information on Pillar 2 requirements.

Main movements between September to December 2024 are as follows:

Available own funds:
• CET1, Tier 1 and Total capital increased € 0.2 bn primarily due to inclusion of full year profit (€ 2.35 bn) less foreseeable charges for dividends (€ 0.9 bn) and share buyback (€ 1.2 bn).

Risk-weighted exposure amounts increased by € 0.5 bn mainly due to:

- RISK-weighted exposure amounts increased of € 0.5 bin mainly due to:

  Operational risk increased € 1.6 bin in the period due to higher 3-year average income.

  Credit risk decreased € 0.9 bin primarily due to the first Significant Risk Transfer 'SRT' completed (€ 0.7 bin) and implementation of the IRB Permanent Partial Use 'PPU' move of Sovereign exposures to Standardised (€ 0.6 bin), partly offset by new business outpacing redemptions (€ 0.4 bin).

  Market risk decreased € 0.2 bin primarily due to FX Swaps.

Capital ratios increased due to higher capital partly offset by higher RWA.

The leverage ratio 'LR' increased in the quarter due to higher Tier 1 capital partly offset by higher leverage exposures.

- Liquidity and Funding:

  The December 2024 liquidity coverage ratio remains very strong with the ratio at 201.05%, well in excess of the ratio requirement of 100%. The average of the preceding 12 months LCR is 200.27% per row 17 on the template below.

  The net stable funding ratio remains very strong with the ratio at 161.81%, well in excess of the ratio requirement of 100%.

		a	b	С	d	e
		31/12/2024	30/09/2024	30/06/2024	31/03/2024	31/12/2023
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	9,375	9,131	9,421	9,634	9,868
2	Tier 1 capital	10,613	10,368	10,659	10,747	10,981
3	Total capital	12,282	12,084	12,445	12,355	12,553
	Risk-weighted exposure amounts					
4	Total risk exposure amount	62,030	61,479	60,951	60,854	59,643
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	15.11 %	14.85 %	15.46 %	15.83 %	16.55 %
6	Tier 1 ratio (%)	17.11 %	16.86 %	17.49 %	17.66 %	18.41 %
7	Total capital ratio (%)	19.80 %	19.66 %	20.42 %	20.30 %	21.05 %
	Additional own funds requirements to address risks other than the r	isk of excessi	ve leverage (a	s a percenta	ge of risk-wei	ghted
	exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.60 %	2.60 %	2.60 %	2.60 %	2.75 %
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.46 %	1.46 %	1.46 %	1.46 %	1.55 %
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	1.95 %	1.95 %	1.95 %	1.95 %	2.06 %
EU 7d	Total SREP own funds requirements (%)	10.60 %	10.60 %	10.60 %	10.60 %	10.75 %
	Combined buffer and overall capital requirement (as a percentage of	f risk-weighte	d exposure a	mount)		
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 (%) <sup>2</sup>	- %	- %	- %	- %	<b>–</b> %
9	Institution specific countercyclical capital buffer (%)	1.44 %	1.43 %	1.43 %	1.09 %	1.08 %
EU 9a	Systemic risk buffer (%) <sup>2</sup>	- %	- %	- %	- %	- %
10	Global Systemically Important Institution buffer (%)					
EU 10a	Other Systemically Important Institution buffer (%)	1.50 %	1.50 %	1.50 %	1.50 %	1.50 %
11	Combined buffer requirement (%)	5.44 %	5.43 %	5.43 %	5.09 %	5.08 %
EU 11a	Overall capital requirements (%)	16.04 %	16.03 %	16.03 %	15.69 %	15.83 %
12	CET1 available after meeting the total SREP own funds requirements (%)	9.15 %	8.89 %	9.49 %	9.70 %	10.30 %
	Leverage ratio					
13	Total exposure measure	145,609	143,624	141,093	141,791	140,774
14	Leverage ratio (%)	7.29 %	7.22 %	7.55 %	7.58 %	7.80 %
	Additional own funds requirements to address the risk of excessive	everage (as a	percentage o	of total expos	ure measure)	
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%) <sup>3</sup>	- %	- %	- %	- %	- %
EU 14b	of which: to be made up of CET1 capital (percentage points)	<b>-</b> %	<b>-</b> %	- %	<b>-</b> %	<b>-</b> %
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 (%) <sup>4</sup>	- %	<b>-</b> %	- %	- %	- %
EU 14e	Overall leverage ratio requirement (%)	3.00 %	3.00 %	3.00 %	3.00 %	3.00 %
	Liquidity Coverage Ratio <sup>5</sup>					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	42,824	42,329	41,203	40,721	40,320
EU 16a	Cash outflows - Total weighted value	22,571	22,441	22,173	22,502	22,685
EU 16b	Cash inflows - Total weighted value		1,165	1,072	1,022	949
16	Total net cash outflows (adjusted value)		21,276	21,102	21,480	21,736
17	Liquidity coverage ratio (%)	200.27 %	199.18 %	195.29 %	190.03 %	185.88 %
	Net Stable Funding Ratio					
18	Total available stable funding	108,145	107,022	106,529	105,017	103,891
19	Total required stable funding	66,836	66,032	65,233	65,294	65,316
20	NSFR ratio (%)	161.81 %	162.08 %	163.31 %	160.84 %	159.06 %

<sup>&</sup>lt;sup>1</sup> The Group elected to cease the application of IFRS9 transitional capital arrangements in June 2024 and the Deferred Tax transitional capital arrangements ended 1st January 2024.

<sup>&</sup>lt;sup>2</sup> To date the Group has no conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State nor a Systemic risk buffer.

<sup>&</sup>lt;sup>3</sup> To date the Group has no additional own funds requirements to address the risk of excessive leverage.

<sup>&</sup>lt;sup>4</sup> The Group is not a G-SII and therefore has no value to report for leverage ratio buffer requirement.

 $<sup>^{\</sup>rm 5}$  Average of the preceding 12 months for each quarter of the relevant disclosure period.

#### 2: Template EU KM2: Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

As per Article 45i (3), points (a) and (c) of the Bank Recovery and Resolution Directive 'BRRD II', published in the Official Journal of the EU as Directive 2014/59/EU, amended by Directive (EU) 2019/879 in May 2019, the following template provides a summary of the Minimum Requirement for Own Funds and Eligible Liabilities 'MREL' in accordance with Article 45 and 45e BRRD II.

Under BRRD II, the Group is subject to external MREL and associated disclosures. The purpose of the requirement is for the Group to hold sufficient financial resources to support an orderly resolution in the event of its failure.

The Group is not subject to the Total Loss-Absorbing Capacity 'TLAC' requirements which only applies to Global Systemically Important Institutions 'G-SIIs'.

The current MREL requirement for the Group is the higher of 24.56% of RWAs (30% including the Combined Buffer Requirement) and 7.56% of the leverage exposure. As of 31 December 2024, the Group exceeds these requirements.

There are no IFRS transitional capital arrangement amounts included in own funds as the Group has elected to cease the application of IFRS9 transitional capital arrangements from June 2024 onwards.

		Minimum requirement					
		for own funds and	G-SII Roquiro	ment for own	funds and eligib	la liahilitias <i>l'</i>	TI AC)
		eligible	G-311 Require	ment for own	iunus anu engit	ne nabilities (	ILAC
		liabilities (MREL)					
		a	b	С	d	е	f
		31/12/2024	31/12/2024	30/09/2024	30/06/2024	31/03/2024	31/12/2023
Own funds	and eligible liabilities, ratios and components			1	T		
1	Own funds and eligible liabilities	19,674					
EU-1a	Of which own funds and subordinated liabilities	19,674					
2	Total risk exposure amount of the resolution group (TREA)	62,030					
3	Own funds and eligible liabilities as a percentage of TREA (row1/row2)	31.72 %					
EU-3a	Of which own funds and subordinated liabilities	31.72 %					
4	Total exposure measure of the resolution group	145,609					
5	Own funds and eligible liabilities as percentage of the total exposure measure	13.51 %					
EU-5a	Of which own funds or subordinated liabilities	13.51 %					
6a	Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)						
6b	Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities instruments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption)						
6с	Pro-memo item: If a capped subordination exemption applies under Article 72b (3) CRR, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded Liabilities and that would be recognised under row 1 if no cap was applied (%)						
Minimum r	equirement for own funds and eligible liabilities (MREL)						
EU-7	MREL requirement expressed as percentage of the total risk exposure amount	24.56 %					
EU-8	Of which to be met with own funds or subordinated liabilities	14.05 %					
EU-9	MREL requirement expressed as percentage of the total exposure measure	7.56 %					
EU-10	Of which to be met with own funds or subordinated liabilities	7.56 %					

### 3: Template EU OV1 - Overview of total risk exposure amounts

As per Article 438 point (d), the following template provides an overview of the total risk exposure amounts 'TREA' forming the denominator of the risk based capital requirements calculated in accordance with Article 92 of the CRR.

Note: Total own funds requirements are calculated as 8% of TREA.

- Risk-weighted exposure amount movements September to December 2024:

   Operational risk increased € 1.6 bn in the quarter due to higher 3-year average income.

   Credit risk decreased (excluding counterparty credit risk 'CCR') € 0.8 bn primarily due to the SRT (€ 0.7 bn) and implementation of the PPU move from IRB to Standardised (€ 0.6 bn), partly offset by new business outpacing redemptions (€ 0.4 bn).

   Market risk decreased € 0.2 bn primarily due to FX Swaps.

   Securitisations increased primarily due to the SRT (Row 17 below).

		Total risk expo (TRI		Total own funds requirements
		a	b	С
		31/12/2024	30/09/2024	31/12/2024
1	Credit risk (excluding CCR)	52,063	52,860	4,165
2	Of which the standardised approach	27,350	28,568	2,188
3	Of which the Foundation IRB (F-IRB) approach	18,282	17,807	1,463
4	Of which slotting approach			
EU 4a	Of which equities under the simple riskweighted approach			
5	Of which the Advanced IRB (A-IRB) approach	6,431	6,485	514
6	Counterparty credit risk - CCR	848	1,014	68
7	Of which the standardised approach	331	363	27
8	Of which internal model method (IMM)			
EU 8a	Of which exposures to a CCP	43	40	3
EU 8b	Of which credit valuation adjustment - CVA	58	63	5
9	Of which other CCR	416	548	33
10	Not applicable			
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk	2	5	
16	Securitisation exposures in the non-trading book (after the cap)	952	882	76
17	Of which SEC-IRBA approach	115		9
18	Of which SEC-ERBA (including IAA)	572	617	46
19	Of which SEC-SA approach	265	266	21
EU 19a	Of which 1250%	_	_	_
20	Position, foreign exchange and commodities risks (Market risk)	730	896	58
21	Of which the standardised approach	730	896	58
22	Of which IMA			
EU 22a	Large exposures	_	_	ı
23	Operational risk	7,434	5,822	595
EU 23a	Of which basic indicator approach			
EU 23b	Of which standardised approach	7,434	5,822	595
EU 23c	Of which advanced measurement approach			
24	Amounts below the thresholds for deduction (subject to 250% risk weight) <sup>1</sup>	1,102	1,029	88
25	Not applicable			
26	Not applicable			
27	Not applicable			
28	Not applicable			
29	Total	62,030	61,479	4,962

 $<sup>^1</sup>$  The amount is shown for information only, as these exposures are already included in row 1 Credit risk (excluding CCR) and related 'of which'.

#### 4: Table EU OVC - ICAAP information

As per Article 438 points (a) and (c) the following table below provides information on the Internal Capital Adequacy Assessment Process and ongoing assessment of the bank's risks and how the bank intends to mitigate those risks.

Legal basis	Row number		Qualitative information
Article 438(a) CRR	(a)	Approach to assessing the adequacy of the internal capital.	An annual Material Risk Assessment 'MRA' is conducted to identify all relevant (current and anticipated) material risks which are then assessed from a capital perspective. The sub-risks are identified as part of the MRA process including risks surrounding the quality and composition of capital as well as measurement and forecasting risks. Capital adequacy risk is primarily evaluated through the annual financial planning and the Group's ICAAP processes where the level of capital required to support growth plans and meet regulatory requirements is assessed over the three year planning horizon. Plans are assessed across a range of scenarios ranging from base case and moderate downside scenarios to a severe but plausible stress using the Group's stress testing methodologies.  The ICAAP is fully integrated and embedded in the strategic, financial and risk management processes of the Group. The Capital Adequacy 'CA' Framework sets out the key processes, governance arrangements and roles and responsibilities which support the ICAAP. The Stress Testing Policy and Capital Adequacy Policy were updated in 2023 and further refined in 2024 to reflect the work of the Climate Stress Testing project regarding Climate Stress Testing models, roles and responsibilities and governance requirements relating to climate stress testing across the Group. Two new C&E KRIs, Transition Risk Depletion and Physical Risk Depletion, were introduced to the suite of Capital Adequacy KRIs in 2024 as was a Stress CET1 management buffer metric. Embedding of the ICAAP is facilitated through capital planning, the setting of risk appetite and risk adjusted performance monitoring. In addition to the capital plan, a capital contingency plan is in place which identifies and quantifies actions which are available to the Group in order to mitigate against the impact of changing regulatory requirements, changes in the risk profile of the Group's balance sheet, other internal factors, and changing external risks are regularly assessed by first and second li
			capital adequacy statement attesting that the Board has reviewed and is satisfied with the capital adequacy of the Group.
Article 438(c) CRR	(b)	Upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process.	Not applicable as the competent authority has not requested disclosure of the results of the ICAAP.

#### 5: Template EU TLAC1 Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

As per Article 45i (3), point (b) of the Bank Recovery and Resolution Directive 'BRRD II', published in the Official Journal of the EU as Directive 2014/59/EU, amended by Directive (EU) 2019/879 in May 2019, the following template discloses the composition of own funds and eligible liabilities for the Group as of 31 December 2024. The available own funds and eligible liabilities of the Group amounted to € 19.7 bn, consisting of € 12.3 bn own funds and € 7.4 bn subordinated liabilities.

The Group is not subject to the Total Loss-Absorbing Capacity 'TLAC' requirements which only applies to Global Systemically Important Institutions 'G-SIIs' and therefore columns b and c are not applicable.

		a Minimum requirement for own funds and eligible liabilities (MREL)	G-SII requirement for own funds and eligible liabilities (TLAC)	Memo item: Amounts eligible for the purposes of MREL, but not TLAC
Own funds and e	eligible liabilities and adjustments			
1	Common Equity Tier 1 capital (CET1)	9,375		I
2	Additional Tier 1 capital (AT1)	1,237		
6	Tier 2 capital (T2)	1,670		
11	Own funds for the purpose of Articles 92a CRR and 45 BRRD	12,282		
Own funds and 6	eligible liabilities: Non-regulatory capital elements			•
12	Eligible liabilities instruments-issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	7,397		
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)			
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities, issued prior to 27 June 2019 (subordinated grandfathered)			
EU-12c	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items			
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre cap)			
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)			
14	Amount of non subordinated instruments eligible, where applicable after application of Article 72b (3) CRR			
17	Eligible liabilities items before adjustments	7,397		
EU-17a	Of which subordinated	7,397		
Own funds and 6	eligible liabilities: Adjustments to non-regulatory capital elements			
18	Own funds and eligible liabilities items before adjustments	19,679		
19	(Deduction of exposures between MPE resolution groups)			
20	(Deduction of investments in other eligible liabilities instruments)	(5)		
22	Own funds and eligible liabilities after adjustments	19,674		
EU-22a	Of which own funds and subordinated	19,674		
Risk-weighted ex	xposure amount and leverage exposure measure of the resolution group			
23	Total risk exposure amount	62,030		
24	Total exposure measure	145,609		
Ratio of own fun	ds and eligible liabilities			
25	Own funds and eligible liabilities (as a percentage of total risk exposure amount)	31.72 %		
EU-25a	Of which own funds and subordinated	31.72 %		
26	Own funds and eligible liabilities (as a percentage of total exposure measure)	13.51 %		
EU-26a	Of which own funds and subordinated	13.51 %		
27	CET1 (as a percentage of TREA) available after meeting the resolution group's requirements	7.16 %		
28	Institution-specific combined buffer requirement			
29	of which: capital conservation buffer requirement			
30	of which: countercyclical buffer requirement			
31	of which: systemic risk buffer requirement			
EU-31a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer			
Memorandum it	ems			
EU-32	Total amount of excluded liabilities referred to in Article 72a(2) CRR			

Note: Rows in the template with "Empty set in EU" are not required to be populated and hidden

#### 6: Template EU TLAC3b creditor ranking - resolution entity

As per Article 45i (3), point (b) of the Bank Recovery and Resolution Directive 'BRRD II', published in the Official Journal of the EU as Directive 2014/59/EU, amended by Directive (EU) 2019/879 in May 2019, the following template captures only own funds and liabilities eligible to meet the requirements of Article 45 of Directive 2014/59/EU in accordance with Article 45e of that Directive. It presents, at the level of the resolution entity AIB Group plc (the Holding Company), a breakdown of own funds and liabilities based on their maturities and MREL eligibility, as well as their ranking in the creditor hierarchy in normal insolvency proceedings. Insolvency rankings shall be those communicated by the competent resolution authority in compliance with the standardised presentation specified in Article 8 of this Regulation.

			Insolvency ranking		
		1	2	3	Sum of 1 to 3
		(most junior)		(most senior)	
1	Description of insolvency rank (free text)	Equity	Subordinated claims	Unsecured claims	
5	Own funds and liabilities potentially eligible for meeting MREL	10,580	2,936	7,397	20,913
6	of which residual maturity ≥ 1 year < 2 years		0	1,472	1,472
7	of which residual maturity ≥ 2 year < 5 years		0	4,213	4,213
8	of which residual maturity ≥ 5 years < 10 years		1,036	750	1,786
9	of which residual maturity ≥ 10 years, but excluding perpetual securities		650	963	1,613
10	of which perpetual securities	10,580	1,250	0	11,830

Note: Rows in the template with "Empty set in EU" are not required to be populated and hidden

Chapter 2. Disclosure of risk management objectives and policies

### 7: Table EU OVA - Institution risk management approach

As per Article 435(1) see table below:

Legal	Row		Qualitative information
basis	number		
Point (f) of Article 435(1) CRR	(a)	Disclosure of concise risk statement approved by the management body.	The Group's Risk Management Framework ('RMF') sets out how risk is managed and articulates the integrated approach to risk management within the Group including its licenced subsidiaries. The RMF supports the Group in achieving its strategic ambitions by providing a clear, concise and comprehensive approach to the governance, implementation and embedding of risk management practices. The RMF is reviewed, updated and approved by the Board at least annually to reflect any changes to the Group's business or consideration of external regulations, corporate governance requirements and industry best practice.
			Risk management is central to how the Group conducts its business while safeguarding the Group. The risk management structure in the Group includes defined lines of authority and accountability, effective processes to identify, manage, monitor and report the risks to which the Group is or might be exposed to. Clear responsibilities for the management of risk are defined across the Group through a three lines of defence model which ensures effective independent oversight and assurance in respect of key decisions. Under the three lines of defence model, the primary responsibility for risk management lies with the business line who are required to have effective governance and control frameworks in place for their business and to act within the risk appetite parameters set out. The Risk function provides the second line of defence, providing independent oversight, support and constructive challenge to the first line. Oversight involves regular monitoring of Business Units risk management activities and reporting. The third line of defence is the Group Internal Audit function ('GIA') which provides independent assurance to the Board through the Board Audit Committee on the effectiveness of the system of internal control. GIA carries out its corporate governance responsibilities by providing an independent view on the key risks facing the Group, and on the adequacy and effectiveness of the system of governance, risk management and internal controls in managing these risks. All activities undertaken within, and on behalf of, the Group are within the scope of GIA. This includes the activities of subsidiaries, joint ventures and associates, the risk and control functions including Group Risk and first and second line associates, the risk and control functions including Group Risk and first and second line associates.
			One of the key processes required by the RMF is the Material Risk Assessment ('MRA') which identifies the key risks to which the Group is exposed. The MRA is a top down process performed on an least annual basis for the Group which identifies the key principal and emerging risks. This assessment makes use of horizon scanning and takes into account the Group's strategic objectives and incorporates both internal and external risk information. The Group applies a common taxonomy of risk through its MRA. Separate material risk assessments are also undertaken for the licenced subsidiaries. The Board is responsible for the annual approval of the Group material risk assessment. Additionally, the transmission channel analysis is conducted annually to analyse how different C&E risk drivers transmit through micro and macroeconomic factors and impact on the Group's principal risks.
			One of the key processes required by the RMF is the Material Risk Assessment (MRA) which identifies the key risks to which the Group is exposed. The MRA is a top down process performed on an least annual basis for the Group which identifies the key principal and emerging risks. This assessment makes use of horizon scanning and takes into account the Group's strategic objectives and incorporates both internal and external risk information. The Group applies a common taxonomy of risk through its MRA. Separate material risk assessments are also undertaken for the licenced subsidiaries.
			The following are considered the Dringinal risks foring the Crown and fall into two broad
			The following are considered the Principal risks facing the Group and fall into two broad categories: Financial Risks: Risks that the Group takes intentionally in order to earn a return as part of its business activities. These generally arise through exposure to individuals or corporates, or to market prices and economic conditions. Risks falling into this category include Credit Risk, Market Risk, Liquidity & Funding Risk and Capital Adequacy Risk.
			Non-Financial Risks: Risks that the Group faces as a direct or indirect consequence of its business activities/operations and which it mitigates as appropriate. These risks generally arise from operational errors, failures to comply with regulatory requirements or generally accepted ethical business standards, or from changes in external market conditions (e.g. increased competition from new entrants). Risks falling into this category are Operational Risk, Conduct Risk and Culture Risk, Climate & Environmental Risk, Model Risk, Regulatory Compliance Risk and Business Model Risk.
			The Group Risk Committee is responsible for the annual review of the Group MRA and recommendation to the Board Risk Committee, which in turn recommends to the Board for approval.
			The Group faces 10 Principal Risks which are key areas of management focus including: Credit Risk; Market and Equity Risk; Capital Adequacy Risk; Liquidity and Funding Risk; Business Model Risk; Operational Risk; Climate and Environmental Risk; Model Risk; Culture Risk and Conduct Risk; Regulatory Compliance Risk. In addition, reputation risk may emerge as an outcome risk from any of these areas.
			Although not a Principal Risk for the Group in 2024, as part of the 2024 Material Risk Assessment it was decided to formally recognise Information Security (including Cyber Risk) as a Principal Risk from 1 January 2025.

Point (f) of Article 435(1) CRR	(a)	Disclosure of concise risk statement approved by the management body (continued)	This risk profile interaction with the risk tolerance is managed through the Risk Appetite Statement ('RAS') process. The Board sets the risk appetite for the Group informed by the material risk assessment. Risk appetite is the nature and extent of risk that the Group is willing to take, accept, or tolerate, in pursuit of its business objectives and strategy. It also informs the Group's strategy, and as part of the Risk Management Framework, is a boundary condition to strategy and guides the Group in its risk taking and related business activities. The financial plan is tested to ensure risk appetite adherence.
			The Group RAS is an articulation of the Group's appetite for, and tolerance of risk, expressed through qualitative statements and quantitative limits and thresholds. The Group RAS seeks to encourage appropriate risk taking to ensure that risks are consistent with the Group strategy and risk appetite. The Group RAS cascades into key business segments with separate Risk Appetite Statements for each licenced subsidiary reflecting the risk appetite of the subsidiary as a standalone entity.
			In accordance with Article 432(1) on materiality, the key metrics and ratios that have been included to outline the management of the risk profile through the Risk Appetite process are set out below:
			<ul> <li>Financial</li> <li>Credit Risk: Asset class concentration risk metrics; Country concentration risk metrics; Non-Performing Exposures ('NPE') as a % of customer loans and ECL cover rates.</li> <li>Market &amp; Equity Risk: Earnings Sensitivity; Interest Rate Capital at Risk; Pension Capital at Risk; Equity nominal investment; Credit Spread Capital at Risk.</li> <li>Capital Adequacy Risk: Fully Loaded CET1 Ratio; Fully Loaded Internal Capital Buffer; Aggregate Group RAROC on New Business.</li> <li>Liquidity and Funding Risk: Liquidity Coverage Ratio ('LCR'); Survival Period; Net Stable Funding Ratio ('NSFR').</li> </ul>
			<ul> <li>Non Financial</li> <li>Business Model Risk: Operating profit % variance to plan; Return on tangible Equity; Net interest margin ('NIM').</li> <li>Operational Risk: Cumulative operational risk losses; Cyber security and technology risk metrics.</li> <li>Climate &amp; Environmental Risk: % of new lending to energy efficient homes (residential)</li> </ul>
			<ul> <li>mortgages); % of new lending to energy efficient buildings.</li> <li>Model Risk: Quarterly risk assessment of approved models in use.</li> <li>Culture Risk and Conduct Risk: The identification of critical customer impacting conduct issues; Number of product portfolio reviews outstanding &gt;3 months; Completion of Mandatory Training Courses.</li> <li>Regulatory Compliance Risk: Regulatory breaches; Impact assessment for delayed delivery of regulatory directive change initiatives; Number of data protection incidents that resulted in a significant personal data breach.</li> </ul>
			resulted in a significant personal data preach.

Point (b) of Article 435(1) CRR	(b)	Information on the risk governance structure for each type of risk.	The overall control framework in place is the RMF. This sets out the risk management requirements for the Group and there are supporting frameworks and policies in place for each material risk. The supporting executive committees that are key to the management of the material risks are:  Group Risk Committee ('GRC'):  The Group Risk Committee is the most senior management risk committee and is accountable to the Executive Committee to set policy and monitor all risk types across the Group to enable delivery of the Group's risk strategy.  The roles and responsibilities of the Group Risk Committee are:  Reviewing and approving (or recommending to the Board and/or its subcommittees where appropriate) risk frameworks, risk appetite statements, risk policies and thresholds in order to manage the risk profile of the Group;  Monitoring and reviewing the Group's risk profile (enterprise wide);  Periodically reviewing the effectiveness of the Group's risk management policies for identifying, evaluating, monitoring, managing and measuring significant risks;  Providing oversight and challenge of regulatory, operational and conduct risk related matters:  Providing oversight and challenge of regulatory, operational and conduct risk related matters.  Providing oversight and challenge of risk measurement matters;  Overseeing the credit portfolio exposures and trends;  Providing oversight and challenge of risk measurement matters;  Considering and reviewing the Group's risk profile and the business segment limits for equity risk;  Considering and assessing management's response to Group Internal Audit findings.  The sub-committees of the GRC are the Group Credit Committee, the Group IRB Committee, the Regulatory and Conduct Risk Committee, the Model Risk Committee and the Operational Risk Committee:  The Group Credit Committee (and its sub-committees) is responsible for developing and monitoring credit policy within the Group and approval of all large credit transactions.  The Areas Credit Committee ensures delivery of the com
--	-----	---	--

Risk Management Framework - Continued

Group Asset and Liability Management Committee ('ALCo')
ALCo has been established as a sub-committee of the Executive Committee. ALCo is the
Group's strategic and business decision making forum for balance sheet management matters. ALCo is tasked with decision-making in respect of the Group's balance sheet structure, including capital, funding, liquidity, interest rate risk in the banking book from an economic value and net interest margin ('NIM') perspective, foreign exchange ('FX') risks and other market risks to ensure it enables the delivery of the Group's Strategic Plan. ALCo provides oversight of funding and liquidity, capital, market and equity/investments risk as well as balance sheet pricing in line with the relevant risk frameworks and policies in accordance with risk appetite. ALCo also monitors, reviews and makes decisions regarding key legal, regulatory and accounting developments affecting the measurement and control of balance sheet risks and capital. ALCo is supported by its three subcommittees, Equity Investment Committee, the Stress Testing Committee and the Asset and Liability Management Technical Committee ('ALMTC').

#### Approved Limits:

The approved metrics and ratios used in setting the risk appetite are detailed above.

Risk culture is an integral part of the Group's overall culture and plays a crucial role for the Group to achieve its strategic objectives. The risk culture defines how risk is managed and owned throughout the Group. It is the values, behaviours, beliefs, knowledge, attitudes, awareness and understanding of, and towards risk shared by individuals. It sets the foundation for how the Group manages risk in a consistent and coherent manner. An effective Group RAS is highly dependent on risk culture. Risk culture is one of the key elements of the Group's RMF. It is through the risk framework and policy documents that an awareness of risk and control is set and cascaded throughout the Group including a Culture and Conduct Risk Framework which emphasises the criticality of ensuring fair customer outcomes. The Group's promotion of risk learning through recommended risk training and education supports the embedding of risk culture. These ongoing activities are supported by an annual Group wide risk awareness week to reinforce key risk themes. The Group has a principles based Code of Conduct which sets out how employees are expected to behave in terms of Business, Customer and Employees. The Code is fully aligned to the Group's Purpose and the Values, and is supported by a range of employee policies including Conflicts of Interests and Speak Up. The Code and policies are reviewed (and updated if required) on an annual basis and are communicated through an annual mandatory e-Learning course, which must be completed by anyone working in or for the Group. The Group's Speak Up Policy is the whistleblowing policy. It sets out how all those working in and for the Group, including but not limited to, employees, agency staff, tied agents, suppliers, contractors, consultants and those providing an outsourced service, can safely and confidentially speak up to raise a concern about suspected or actual wrongdoing in work, without fear of penalisation. The policy outlines the channels available to raise such concerns and was approved by the Board . Audit Committee.

Point (e) (c) of Article 435(1) CRR

Declaration approved by the management body on the adequacy of the risk management arrangements. Directors' Statement on Risk Management and Internal Controls

The Board of Directors is responsible for the Group's system of internal control, which is designed to manage the risk of failure to achieve business objectives and can provide only reasonable and not absolute assurance against material misstatement or loss. The Group has implemented a framework and policy architecture covering business and financial planning, corporate governance and risk management. The system of internal controls is designed to ensure that there is thorough and regular evaluation of the Group's risks in order to mitigate accordingly, rather than to eliminate risk. This is done through a process of identification, assessment, management, measurement, monitoring and reporting. This process includes an assessment of the effectiveness of internal controls, which was in place for the full year under review up to the date of approval of the financial statements, and which accords with the Central Bank of Ireland's Corporate Governance requirements for Credit Institutions 2015 and the UK Corporate Governance Code 2018.

The Board has ultimate responsibility for risk appetite and reviewing the effectiveness of the system of internal control on a continuous basis and is supported by a number of sub-committees including Board Audit Committee ('BAC'), Board Risk Committee ('BRC'), Remuneration Committee, Sustainable Business Advisory Committee ('SBAC'), Technology and Data Advisory Committee ('TDAC'), and Nomination & Corporate Governance Committee. The BRC is appointed by the Board to assist the Board in fulfilling its oversight responsibilities. the BRC is appointed by the Board to assist the Board in fulfilling its oversight responsibilities the source of the Group's finances and operations (including all operations, legal entities and branches in ROI, the UK and USA) taking a forward looking perspective and anticipating changes in business conditions. The Committee discharges its responsibilities in ensuring that risks within the Group are appropriately identified, reported, assessed, managed and controlled to include commission, receipt and consideration of reports on key strategic and operational risk issues. It ensures that the Group's overall actual and future risk appetite statement and strategy, taking into account all types of risks, are aligned with the business strategy, objectives, corporate culture and values of the institution while promoting a risk awareness culture within the Group. The BRC oversees and challenges the risk management function, which is managed on a day-to-day basis by the Chief Risk Officer ('CRO') and liaises regularly with the CRO to ensure the development and on-going maintenance of a risk management system within the Group that is effective and proportionate to the nature, scale and complexity of the risks inherent in the business. The BRC provides qualitative and quantitative input to the Remuneration Committee on the alignment of variable remuneration to risk performance for material risk takers. The Committee further provides advice on the ongoing viability of the Group, taking into account the Group's overall position and principal risks. The committee is composed of Independent Non-Executive Directors and operates under Board approved terms of reference. The Chief Financial Officer ('CFO'), the CRO, the Group Internal Auditor and the External Auditor are involved in meetings of the BRC, where appropriate.

The BAC is appointed by the Board to assist it in fulfilling its oversight responsibilities in relation to the quality and integrity of the Group's accounting policies, financial and narrative reports, non-financial disclosures, and disclosure practices. The Committee also ensures the effectiveness of the Group's internal control, risk management, and accounting and financial reporting systems and the adequacy of arrangements by which staff may, in confidence, raise concerns about possible improprieties in matters of financial reporting or other matters. It also ensures the independence and performance of the internal and external auditors. The BAC works to ensure that this purpose is fully aligned to the Group's strategy and values, considers the interests of stakeholders while operating within all applicable regulatory and statutory requirements. The BAC is composed of Independent Non-Executive Directors and operates under a Board approved terms of reference. Neither the Chair of the Board nor the CEO are permitted to be members of the BAC. The CFO, the CRO, the Group Internal Auditor and the External Auditor are involved in meetings of the BAC, where appropriate.

The Remuneration Committee is appointed by the Board to ensure the Group's overall Remuneration Policy for employees and directors, designed to support the long term business strategy, values and culture of the Group as well as to promote effective risk management, and reward fairly and responsibly, with a clear link to corporate and individual performance in compliance with applicable legal and regulatory requirements.

The SBAC was established by the Board to act as an Advisory Committee, supporting the execution of the Group's sustainable business strategy in accordance with the approved Group Strategic and Financial Plan. The Strategy includes the development and safe guarding of the Group's "social licence to operate" through Environmental, Social and Governance activities, alignment with the United Nations Environmental Programme Finance Initiative ('UNEPFI') Principles for Responsible Banking, UN Global Compact and the Group's Pledge to Do More.

The TDAC is appointed by the Board as an Advisory Committee to assist in fulfilling its oversight responsibilities by reviewing and challenging the strategy, governance and execution of matters relating to technology, data and cyber security and to review and assess technology related deliverables for key change projects.

The Nomination and Corporate Governance Committee is appointed by the Board to support and advise it in fulfilling its oversight responsibilities in relation to the composition of the Board. It does this by ensuring the Board is comprised of individuals who are best able to discharge the duties and responsibilities of Directors, by leading the process for nominations and appointments to the Board and Board Committees as appropriate, and making the recommendations in this regard to the Board for its approval. It also supports and advises the Board in fulfilling its oversight responsibilities in relation to the composition of the Group's Executive Committee and the composition of the Boards of its material subsidiaries. It keeps Board governance arrangements, corporate governance compliance and related policies under review and makes appropriate recommendations to the Board to ensure corporate governance practices are consistent with best practice standards.

Directors' Statement on Risk Management and Internal Controls - Continued Executive risk management and controls The Executive Committee ('ExCo') is the most senior executive committee of the Group. Subject to financial and risk limits set by the Board, and excluding those matters which are reserved specifically for the Board, the ExCo has primary authority and responsibility for the day-to-day operations of, and the development of strategy for the Group. The ExCo works with and advises the CEO, ensuring a collaborative approach to decision making and collective ownership of strategy development and implementation, including promoting action to address performance issues as required. The ExCo has delegated certain functions to a number of executive sub-committees, which operate under term of reference approved by the ExCo and subject to formal review every two years. The Group Risk Committee ('GRC') was established by, and is accountable to, the ExCo to set policy and monitor all risk types across the Group and to enable delivery of the Group's risk strategy. It is the primary second line of defence risk management committee of the Group. It provides oversight and monitors strategic business initiatives that have material implications for the Group to ensure they align and are consistent with the Group risk appetite and other risk policies as approved by the BRC. The Group Asset and Liability Committee ('ALCo') is a sub-committee of the ExCo and acts as the Group's strategic and business decision making forum for balance sheet management matters. It is tasked with decision-making in respect of the Group's balance sheet structure, including capital, funding, liquidity, Interest Rate Risk in the Banking Book ('IRRBB') from an economic value and Net Interest Margin ('NIM') perspective, Foreign Exchange ('FX') hedging risks and other market risks to ensure it enables the delivery of the Group's strategic plan. It provides oversight of Funding and Liquidity, Capital, Market and Equity/Investments Risk and Balance Sheet pricing in line with the relevant Frameworks and policies (approved by GRC) across the Group in accordance with Risk There is a centralised risk control function headed by the CRO, who is responsible for independent challenge, ensuring that risks are understood, managed, measured, monitored and reported on, and for reporting on risk mitigation actions. The Risk function is responsible for establishing and embedding risk management frameworks, ensuring that material risk policies are reviewed, and reporting on adherence to risk limits as set by the Board of Directors. The Group's risk profile is measured against its risk appetite and exceptions are reported to the GRC and BRC through the CRO report. Material breaches of risk appetite are escalated to the Board and reported to the Central Bank of Ireland/Joint Supervisory Team The centralised credit function is headed by a Chief Credit Officer who reports to the CRO. Compliance, which is part of the Risk function, provides interpretation and assessment of compliance risk, specifically, laws, regulations, rules and codes of conduct applicable to its banking activities. There is an independent Group Internal Audit function which is responsible for independently assessing the effectiveness of the Group's corporate governance, risk management and internal controls and reports directly to the Chair of the BAC.

AlB employees who perform pre-approved controlled functions/controlled functions meet the required standards as outlined in the Group's Fitness and Probity programme. In the event that material failings or weaknesses in the systems of risk management or internal control are identified, Management is required to attend the relevant Board forum to provide an explanation of the issue and to present a proposed remediation plan. Agreed remediation plans are tracked to conclusion, with regular status updates provided to the relevant Board forum. Given the work of the Board, BRC, BAC and representations made by the ExCo during the year, the Board is satisfied that the necessary actions to address any material failings or weaknesses identified through the operation of the Group's risk management and internal control framework have been taken, or are currently being undertaken. Taking this and all other information into consideration as outlined above, the Board is satisfied that there has been an effective system of control in place throughout the Disclosure on the Risk reporting processes are in place for each of the principal risks under the relevant risk Point (c) of Article scope and nature frameworks and policies. This enables management, governance committees and other 435(1) of risk disclosure stakeholders to oversee the effectiveness of the risk management processes, adherence to risk Policies and to regulatory requirements. Each of the material risks has a specific approach to how the risk is measured. The Group RAS and the separate risk appetite CRR and/or measurement statements for the business segments and licensed subsidiaries contain metrics which are systems. measured on a monthly basis against the limits set. Metrics for Group RAS and any deviations to appetite for Group, segments and subsidiaries are reported to Group Risk Committee and Board Risk Committee through the CRO report. The Group CRO has unrestricted access to the Chair of the Board and BRC. The CRO provides extensive reporting on the risks through the CRO report, including extensive detail on each of the principal risks and details of mitigants/ controls and management actions in place to address areas of concern. It also presents the Group's risk profile against its risk appetite.

Point (c) of Article 435(1) CRR	(e)	Disclose information on the main features of risk disclosure and measurement systems.	The risk strategy, articulated through the annual risk plan and the risk objectives, is a key element of the Board's understanding of how risk is to be managed in the short, medium and long term. The Group has a set of strategic risk objectives which support the delivery of the Group's strategy, with a specific focus on the Risk and Capital pillar.  The key processes which support the Group's approach to risk management are set out below:  Identification and assessment: through various assessments and processes including analysis and testing across material risks;  Monitoring, escalating and reporting: the continuous monitoring of risks to ensure that the key risks remain within risk appetite; and  Testing and assurance: an objective examination of evidence for the purpose of providing an independent assessment of governance, risk management and control processes for the Group in relation to all risk types.  Identification and assessment  Risk is identified and assessed in the Group through a combination of the following:  Material risk assessment ('MRA');  Risk and control assessments ('RCA');  Annual Financial Plan;  Stress testing & Scenario Analysis;  Annual Internal Capital Adequacy Assessment Process ('ICAAP');  Annual Internal Liquidity Adequacy Assessment Process ('ILAAP');  Recovery and resolution planning.
			Material risk assessment ('MRA') The MRA is a top down process performed on at least an annual basis for the Group which identifies the key principal risks and the identification of emerging and evolving risks. This assessment makes use of horizon scanning and takes into account the Group's strategic objectives and incorporates both internal and external risk information. The Board is responsible for the annual approval of the Group material risk assessment.  Risk and control assessments ('RCA') The first line of defence is responsible for ensuring that detailed bottom up RCAs are undertaken for all businesses or business processes falling under their responsibility. These assessments are performed regularly and whenever there is a material change in organisation, business processes or business environment.  Integrated Annual Financial Plan The financial plan is integral to how the Group manages its business and monitors performance. It informs the delivery of the Group's strategy and is reviewed and challenged by the Risk function to ensure that it is within the Group's risk appetite. It enables realistic business objectives to be set for management, identifies accountability in the Group's delivery of planning targets and identifies the risks to the delivery of the Group's strategic goals and the mitigants of those risks. The plan is produced under a base scenario and assessed under a range of alternative scenarios. This assessment forms the basis for consideration of business model risk and internal capital adequacy.

Risk Strategy - Continued

Internal Capital Adequacy Assessment Process ('ICAAP')
This is the Group process to ensure adequate capital resources are maintained at all times, having regard to the nature and scale of its business and the risks arising from its operations. The ICAAP is the process by which the Group performs a formal and rigorous assessment of its balance sheet, business plans, risk profile and risk management processes to determine whether it holds adequate capital resources to meet both internal objectives and external regulatory requirements. Multiple scenarios are considered for each ICAAP including both systemic and idiosyncratic stress tests ranging from moderate to extreme and are applied to the Group's material risks as identified through its material risk assessment. The stress time horizon of three years is aligned with the planning horizon.

Internal Liquidity Adequacy Assessment Process ('ILAAP')

The Internal Liquidity Adequacy Assessment Process ('ILAAP') is the process by which the Group performs a formal and rigorous assessment of its balance sheet, business plans, risk profile and risk management processes to determine whether it holds sufficient liquid resources of appropriate quality to meet both internal objectives and external regulatory requirements. Multiple scenarios are considered for each ILAAP including both firm specific and systemic risk events and a combination of both to ensure the continued stability of the Group's liquidity position within the Group's pre-defined liquidity risk tolerance levels. The stress time horizon of three years is aligned with the planning horizon.

Recovery planning

The Group's recovery plan sets out the arrangements and measures that the Group could adopt in the event of severe financial stress to restore the Group to long term viability. A suite of indicators and options are included in the Group's recovery plan, which together presents the identification of stress events and the tangible mitigating actions available to the Group to restore viability.

Resolution planning

Resolution is the restructuring of a bank by a resolution authority that has failed or is likely to fail, through the use of resolution tools in order to:

-safeguard the public interest;

ensure the continuity of the Group's critical functions;

ensure financial stability in the economy in which it operates; and

-minimise costs to taxpayers.

Risk Strategy - Continued

Monitoring, escalating and reporting

#### Setting risk appetite

The CRO proposes and the Board approves the risk appetite for the Group informed by the material risk assessment. Risk appetite is the nature and extent of risk that the Group is willing to take, accept, or tolerate in pursuit of its business objectives and strategy. It also informs the Group's strategy, and as part of the Risk Management Framework, is a boundary condition to strategy and guides the Group in its risk taking and related business activities. The financial plan is tested to ensure it is within the risk appetite.

The Group Risk Appetite Statement is an articulation of the Group's appetite for, and tolerance of risk expressed through qualitative statements and quantitative limits and thresholds. The Group Risk Appetite Statement seeks to encourage appropriate risk taking to ensure that risks are consistent with the Group strategy and risk appetite. The Group Risk Appetite Statement cascades into key business segments with separate Risk Appetite Statements for each licenced subsidiary reflecting the risk appetite of the subsidiary as a standalone entity.

#### Risk measurement

Each of the material risks has a specific approach to how the risk is measured. The Group Risk Appetite Statement and the separate risk appetite statements for the business segments and licensed subsidiaries contain metrics which are measured on a monthly basis against the thresholds set.

#### Risk management

The material risk types are actively managed and measured against their respective frameworks, policies and processes on an ongoing basis. Risk models are used to measure credit, market, liquidity and funding risk, and where appropriate, capital is allocated (taking account of risk concentrations) to mitigate material risks. The management and measurement of the Group's risk profile also informs the Group's strategic and operational planning processes. Any deviations to risk appetite are escalated through appropriate governance, with management actions to address where possible.

The Group has designed risk appetite statement metrics for each of its material risk categories. Material risks are actively monitored under their respective frameworks and policies to ensure material risks are managed effectively in line with the Group's Risk Management Framework and Risk Appetite Statement. The Risk Appetite Policy sets out the process for the escalation of the relevant risk appetite statement limit breaches. On a regular basis, the CRO reports actual performance against Risk Appetite Statements to the Board Risk Committee and material breaches of risk appetite are reported to the Board and the Group's regulator, where appropriate.

#### Testing and assurance

The Group has implemented testing and assurance activities with the objective to provide assurance to the Board, and its delegated sub-committees on the design and operating effectiveness of the control environment within the Group. The material risk types are continuously tested and assured in line with the Group assurance methodology, which distinguishes between risk management, risk control and risk assurance. Each line of defence is responsible for preparing business controls testing plans with consideration of the adequacy of the risk identified and the design and effectiveness of the controls in place. The combined assurance is the alignment of governance, risk and assurance activities, linked with the Group's strategy with the objective to provide better co-ordinated efforts, risk reporting, and to continuously improve performance and resilience.

that risk assessment is dynamic and forward looking, and considers not only existing risks be also potential and emerging threats. Stress test methodologies are developed to assess the material risks identified in the material risk assessment process. The Group undertakes stress testing on all the Group's exposures including loans and receivables, the investment securities book, equity investments and other exposures related to our Treasury business. I also include the macroeconomic scenarios used for planning. Intest stress testing purpose are reviewed by the Asset and Liability Committee ("ALCo") and by the Board Risk Committee. The Group's stress testing programme embraces a range of forward looking stress tests and takes all the Group's material risks into account. These include:  I ICAAP stress testing undertaken on an annual basis in support of the Internal Capital Adequacy Assessment Process and is integrated with the Group's annual financial planning. This aims to highlight the key vulnerabilities of the Group and inform potential ruture capital needs including capital buffers, in excess of minimum regulatory capital requirements and internal capital requirements under both base discussed and internal capital requirements under both base discussed and internal capital requirements under both base discussed as papilied to the Group's material risks as identified through; its MRA. The time horiton of a years is aligned with the planning horizon. Other alternative scenarios can be supported as and when required, subject to confirmation through normal governance channels, suc as climate stress testing approach consider the impact of physical and transition risks across a number of scenarios on the Group's exposures. The initial scope of climate stress testing authorities and climate modelling in the Group, in spranrily focused on the credit risinglications for the loan portfolio.  Internal capital stress testion and all the material risks of the Group. These consider the implications of a severe shock acros			1	
	of Article 435(1)	(f)	processes to manage risks for each separate	Approach for managing risks.  Stress testing  Stress testing is recognised as a key risk management process by the Group. It seeks to ensure that risk assessment is dynamic and forward looking, and considers not only existing risks but also potential and emerging threats. Stress test methodologies are developed to assess the material risk identified in the material risk assessment process. The Group undertakes stress testing on all the Group's exposures including loans and receivables, the investment securities book, equity investments and other exposures related to our Treasury business. It also include the macroeconomic scenarios used for planning. Internal stress testing purposes are reviewed by the Asset and Liability Committee ('ALCo') and by the Board Risk Committee.  The Group's stress testing programme embraces a range of forward looking stress tests and takes all the Group's material risks into account. These include:  I CAAP stress testing undertaken on an annual basis in support of the Internal Capital Adequacy Assessment Process and is integrated with the Group's annual financial planning. This aims to highlight the key vulnerabilities of the Group and inform potential future capital needs including capital buffers, in excess of minimum regulatory capital requirements and internal capital requirements under both base and stressed conditions over the planning horizon. Multiple scenarios are considered for each ICAAP including both systemic and idiosyncratic stress tests ranging from moderate to extreme and are applied to the Group's material risks as identified through its MRA. The time horizon of 3 years is aligned with the planning horizon. Other alternative scenarios can be supported as and when required, subject to confirmation through normal governance channels, such as climate stress tests.  The climate stress tests.  The climate stress tests in appired to the forup's exposures. The initial scope of climate stress testing applied to the forup is portfolio feverage loans;  Annual ILAP stress tes
testing models.				regulatory requirements, achieved through the comprehensive review and challenge of macroeconomic scenarios and stress test outcomes, and the ongoing validation of stress

Points (a) and (d) of Article 435(1) CRR	(g)	Information on the strategies and processes to manage, hedge and mitigate risk: as well as on the monitoring of the effectiveness of hedges and mitigants.

When a financial instrument is designated as a hedge, the Group formally documents the relationship between the hedging instrument and hedged item as well as its risk management objectives and its strategy for undertaking the various hedging transactions. The Group also documents its assessment, both at hedge inception and on an ongoing basis, of whether the derivatives that are used in hedging transactions are highly effective in offsetting changes in fair values or cash flows of the hedged items.

The Group discontinues hedge accounting when:

- a) it is determined that a derivative is not, or has ceased to be, highly effective as a hedge;
- b) the derivative expires, or is sold, terminated, or exercised;
- c) the hedged item matures or is sold or repaid; or
- d) a forecast transaction is no longer deemed highly probable.

To the extent that the changes in the fair value of the hedging derivative differ from changes in the fair value of the hedged risk in the hedged item, or the cumulative change in the fair value of the hedging derivative differs from the cumulative change in the fair value of expected future cash flows of the hedged item, ineffectiveness arises. The amount of ineffectiveness, (taking into account the timing of the expected cash flows, where relevant) provided it is not so great as to disqualify the entire hedge for hedge accounting, is recorded in the income statement.

An interest rate Structural Hedging Programme ('SHP') is used by AIB which aims to ensure a stable Net Interest Income. The first line of defence makes proposals to ALCo on how this interest rate management strategy should be effected, outlining the expected net interest income impacts. The second line provide an accompanying review and challenge to ALCo.

The perceived strength of a borrower's repayment capacity is the primary factor in granting a loan. However, the Group uses various approaches to help mitigate risks relating to individual credits, including transaction structure, collateral and guarantees. The main types of collateral for loans and advances to customers are described under the section on collateral. Credit policy and credit management standards are controlled and set centrally by the Credit Risk function. Occasionally, credit derivatives are purchased to hedge credit risk. Current levels are modest and their use is subject to the normal credit approval process.

The Group enters into netting agreements for derivatives with certain counterparties, to ensure, that in the event of default, all amounts outstanding with those counterparties will be settled on a net basis. Derivative transactions with wholesale counterparties are typically collateralised under a Credit Support Annex in conjunction with the International Swaps and Derivatives Association ('ISDA') Master Agreement.

## 8: Table EU OVB - Disclosure on governance arrangements

As per Article 435(2) the following table provides information on the Group's governance arrangements.

Legal basis	Row number		Qualitative information
Article 435(2) CRR		Governance arrangements.	The Group's governance framework underpins effective decision-making and accountability. It is the basis on which the Group conducts its business and engages with customers and other stakeholders. It ensures that organisational and control arrangements are appropriate for the governance of the Group's strategy and operations and the mitigation of related material risks. This framework encompasses AlB Group plc and its subsidiaries (collectively referred to as "AlB Group" or the "Group").  The Group's corporate governance practices meet the statutory and regulatory obligations
			that apply to the Group, including various corporate governance codes, regulations and best practice standards and guidelines, Irish company law, the listing rules of the main securities market of the Euronext Dublin and the London Stock Exchange, the UK Corporate Governance Code 2018 and, for the UK business, UK company law.
			The Group's governance arrangements include a Board of Directors of sufficient size and expertise, the majority of whom are Independent Non-Executive Directors, to oversee the operations of the Group. At 31 December 2024, the Board consisted of the Chair, who was deemed independent on appointment, twelve Independent Non-Executive Directors and two Executive Directors, being the Chief Executive Officer ("CEO") and the Chief Financial Officer.
			The Group is headed by an effective Board which is collectively responsible for the long term, sustainable success of the Group, generating value for shareholders and contributing to wider society. The Board has delegated the day to day running of the Group to the CEO, who is in turn supported by the Executive Committee, being the most senior management committee of the Group. The Executive Committee has primary responsibility for the day-to-day operations of, and the development of strategy for the Group.
			The Board supports, and strives to operate in accordance with, the Group's purpose and values at all times and challenges Management as to whether the purpose, values and strategic direction of the Group align with its desired culture, or if they do not, whether there are options to mitigate negative stakeholder impacts.
			The Board ensures a clear division of responsibilities between the Chair, who is responsible for the overall leadership of the Board and for ensuring its effectiveness, and the CEO, who manages and leads the business. The governance framework and organisational structure is sufficient to ensure that no one individual has unfettered powers of decision or exercises excessive influence. Key roles and responsibilities are clearly defined, documented and communicated to key stakeholders via the Group's website www.aib.ie/investorrelations.
			Whilst arrangements have been made by the Directors for the delegation of the management, organisation and administration of the Group's affairs, certain matters are reserved specifically for decision by the Board. These matters are kept under review to ensure that they remain relevant and are available on the Group's website www.aib.ie/investorrelations.
			The Board is assisted in the discharge of its duties by a number of Board and Advisory Committees, whose purpose is to consider, in greater depth than would be practicable at Board meetings, matters for which the Board retains responsibility. The Board has established a Board Risk Committee, Board Audit Committee, Nomination and Corporate Governance Committee and Remuneration Committee comprised of Non-Executive Directors. In addition to the four main Board Committees, the Board has a Sustainable Business Advisory Committee and a Technology and Data Advisory Committee. Each of the advisory committees comprise of Non-Executive Directors and members of senior management from relevant business areas. Each Committee operates under terms of reference approved by the Board.
			The term management body is frequently used in relevant European Banking Authority guidelines and in AIB Group is understood to be the Board of Directors and the Board Committees.

Point (a) (a) of Article	directorships held	The number of directorships held by members of the Board as at 31 December 2024 is listed below.
435(2) CRR	by members of the management body.	Director Number of Directorships*
		Andy Maguire 3 Non-Executive Directorships Anik Chaumartin 4 Non-Executive Directorships Ann O'Brien 1 Non-Executive Directorship Basil Geoghegan 2 Non-Executive Directorships Brendan McDonagh 2 Non-Executive Directorships Colin Hunt 1 Executive Directorship Donal Galvin 1 Executive Directorship Elaine MacLean 1 Non-Executive Directorship Elaine Mormoyle 3 Non-Executive Directorships Helen Normoyle 3 Non-Executive Directorships Jan Sijbrand 2 Non-Executive Directorships Jim Pettigrew 2 Non-Executive Directorships Raj Singh 3 Non-Executive Directorships Sandy Kinney Pritchard 3 Non-Executive Directorships Tanya Horgan 2 Non-Executive Directorships  *Directorships have been counted under CRD Article 91(3) and (4) and are reflective of any Group company as one directorship, and exclude directorships in non-commercial entities.
Point (b) of Article 435(2) CRR	Information regarding the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise.	The review of the appropriateness of the composition of the Board and Board Committees is a continuous process, and recommendations are made based on merit and objective criteria, having regard to the collective skills, experience, independence and knowledge of the Board along with its diversity requirements. The Board Succession Plan is reviewed alongside the Board Skills Matrix by the Nomination and Corporate Governance Committee at each scheduled meeting to allow for proactive and continuous succession planning and, in turn, the timely commencement of Director search processes.  The Board Succession Plan details planned Board composition as well as Board Committee membership, the likely tenure of Non-Executive Directors and upcoming actions to be undertaken. The skills included in the Board Skills Matrix were identified taking into account the Group's strategic priorities and relevant regulatory requirements. Each Non-Executive Director was selected for appointment on the basis of their knowledge, skills and experience which enable them to effectively discharge their duties, ensure the effective governance of the Group, and contribute to its long-term, sustainable success. A Board-approved Policy is in place for the assessment of the suitability of members of the Board, which outlines the Board appointment process, and is in compliance with applicable joint guidelines issued by the European Securities and Markets Authority and the European Banking Authority  In addressing appointments to the Board, a role profile for the proposed new Directors is prepared by the Group Company Secretary on the basis of the criteria laid down by the Nomination and Corporate Governance Committee, taking into account the existing skills and expertise of the Board and the anticipated time commitment required. The services of experienced third party professional search firms are retained for Non-Executive Director appointments where required and deemed necessary by the Nomination and Corporate Governance Committee. In all Director

Point (c) of Article 435(2) CRR	(c)	Information on the diversity policy with regard of the members of the management body.	A formal Board Diversity Policy is in place which sets out the approach to diversity on the Board and is available on the Group's website at www.aib.ie/investorrelations.  The Nomination and Corporate Governance Committee (the "Committee") is responsible for developing measurable objectives to effect the implementation of this Policy and for monitoring progress towards achievement of the objectives. The Policy and performance relative to the target is reviewed annually by the Committee, in conjunction with Board succession and skills planning, and any proposed changes to the Policy are presented to the Board for approval. The Boards target, as set out in its Diversity Policy, is that it shall maintain at least 40% female representation and at least one Board member shall be from a minority ethnic group. As at 31 December 2024, the percentage of females on the Board stood at 40% and one Director was a member of an ethnic minority group, thereby meeting its Board Diversity Policy targets as well as regulatory requirements on gender diversity and best practice guidelines on ethnicity. Additionally, in compliance with the UK Listing rule requirement, at least one senior Board position (Chair, Chief Executive Officer, Senior Independent Director or Chief Financial Officer), was held by a female.  The Board recognises that diversity in its widest sense is important, is inclusive of all individuals and is focused on ensuring a truly diverse board. The Board embraces the benefits of diversity among its members and through its succession planning is committed to achieving the most appropriate blend and balance of diversity possible over time.  In terms of implementation of the Board Diversity Policy, the Committee reviews and assesses the Group Board composition and has responsibility for leading the process for identifying and nominating, for approval by the Board, candidates for appointment as Directors. In reviewing the Board composition, balance and appointment, the Committee considers candidates on merit against ob
Point (d) of Article 435(2) CRR	(d)	Information whether or not the institution has set up a separate risk committee and the frequency of the meetings.	As at 31 December 2024, the Board Risk Committee (the "Committee") comprised seven Non-Executive Directors all considered by the Board to be independent. The Board has determined that the Committee members have the collective skills and relevant experience to enable the Committee to discharge its responsibilities. The Committee met on twelve occasions during 2024.
Point (e) Article 435(2) CRR	(e)	Description on the information flow on risk to the management body.	Risk reporting processes are in place for each of the material risks under the relevant risk frameworks and policies. This enables management, governance committees and other stakeholders to oversee the effectiveness of the risk management processes, adherence to risk policies and to regulatory requirements. Each of the material risks has a specific approach to how the risk is measured. The Group Risk Appetite Statement and the separate risk appetite statements for the licensed subsidiaries contain metrics which are measured on a monthly basis against the limits set. These are reported to Group Risk Committee and Board Risk Committee through the CRO report. The Group has appointed an independent CRO with unrestricted access to the Chair of the BRC. The CRO provides extensive reporting on the risks to the Group through the CRO report at each scheduled meeting of the BRC, and the CRO report provides extensive detail and assurance on each of the material risks including details of mitigants/controls and management actions in place to address areas of concern. It also presents the Group's risk profile against its risk appetite, which represents the Board's defined position on the amount of risk it is willing for the Group to take in pursuit of its strategic objectives.

# Chapter 3. Disclosure of the scope of application

#### 9: Template EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

As per Article 436 point (c) the following template shows both the Group's consolidated balance sheet as at 31 December 2024 on an accounting consolidated basis and the Group's consolidated balance sheet under the regulatory scope of consolidation. The difference between the accounting scope of consolidation and the regulatory scope of consolidation is outlined in themplate EU LI3.

Movements in the consolidated balance sheet are outlined in AlB's Annual Financial Report. Trading derivative financial instruments are the only exposures that are treated under both counterparty credit risk and market risk frameworks subject to capital requirements.

		a	b	С	d	е	f	g
					Can	rying values of ite	ems	
		Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
	Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and balances at central banks	37,315	37,315	37,315	_	_	_	-
2	Trading portfolio financial assets	136	136	_	_	_	136	_
3	Derivative financial instruments	2,144	2,144	-	2,144	1	432	_
4	Loans and advances to banks	1,321	1,321	673	648	1	_	_
5	Loans and advances to customers	69,889	69,889	68,928	50	911	_	-
6	Securities financing	6,643	6,643	_	6,643	_	_	_
7	Investment securities	18,668	18,668	16,380		2,288	_	_
8	Investments accounted for using the equity method	348	348	348	_		_	_
9	Intangible assets and goodwill	934	848	300	_		_	548
10	Property, plant and equipment	516	513	513	_	_	_	2.0
11	Other assets	475	458	458	_	_	_	_
12	Current taxation	21	21	21	_		_	_
13	Deferred tax assets	2,303	2,302	154	_	-	_	2,148
14	Prepayments and accrued income	522	522	522	_	_	_	, -
15	Retirement benefit assets	31	31	_	_	_	_	31
16	Investments in Group		102	102	_		_	
	undertakings				0.105	2.400		
17	Total assets	141,266	141,261	125,714	9,485	3,199	568	2,727
	Breakdown by liability classes according to the balance sheet in the published financial statements							
1	Deposits by central banks and banks	836	836	_	750	_	_	86
2	Customer accounts	109,883	109,906	ı	63	1	_	109,843
3	Securities financing	196	196	_	196	_	_	_
4	Trading portfolio financial liabilities	262	262	-	_	-	262	_
5	Derivative financial instruments	1,807	1,807	_	1,807	-	456	_
6	Debt securities in issue	8,832	8,832	ı	_	ı		8,832
7 8	Lease liabilities Fair value changes of hedged	258	257	_	_		_	257
	items in portfolio hedges of interest rate risk	64	64	_	_	_	_	64
9	Current taxation	2	2	_	_	_	_	2
10	Deferred tax liabilities	14	13	-	_	_	_	13
11	Retirement benefit liabilities	9	9	-	_		_	9
12	Other liabilities	1,111	1,085	-	_	_	-	1,085
13	Accruals and deferred income	735	725		_			725
14	Provisions for liabilities and commitments	203	203	_	_	_	_	203
15	Subordinated liabilities and other capital instruments	1,627	1,627	-	-	_	-	1,627
16	Total liabilities	125,839	125,824	_	2,816	_	718	122,746
	Facilities							
10	Equity							
16	Share capital	1,455	1,455	_	_	1	_	1,455
17	Reserves	12,742	12,752		_		_	12,752
1 10					_	_	_	1,239
18	Other equity interests	1,239	1,239					
19	Non-controlling interests	(9)	(9)	_	_	_	_	(9)
		-					_ _ _ 718	

#### 10: Template EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial

As per Article 436 point (d) the following template below provides information on the main sources of differences between the financial statements' carrying value amounts and the exposure amounts used for regulatory framework purposes. There are fundamental technical differences in the basis of calculation between financial statement information based on International Financial Reporting Standards (IFRS) accounting standards and regulatory information based on CRR. This is most relevant for credit risk disclosures.

There are two different types of templates included in this document, those compiled based on accounting standards (sourced from the Group's Annual Financial Report 2024) and those compiled using CRR methodologies. The specific methodology used is indicated where applicable.

		а	b	С	d	е
				Items su	bject to	
		Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)	138,534	125,714	3,199	9,485	568
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	(3,078)	-	_	(2,816)	(718)
3	Total net amount under the regulatory scope of consolidation	135,456	125,714	3,199	6,669	(150)
4	Off-balance-sheet amounts	17,752	17,752	_	_	
5	Differences in valuations	_	_	_	_	
6	Differences due to different netting rules, other than those already included in row 2	2,369	_	_	2,369	
7	Differences due to consideration of provisions	346	346	_	_	
8	Differences due to the use of credit risk mitigation techniques (CRMs)	4,786	1	_	4,786	
9	Differences due to credit conversion factors	(11,602)	(11,602)	_	_	
10	Differences due to Securitisation with risk transfer	(911)	_	(911)	_	
11	Other differences <sup>1</sup>	158	158	_	_	
12	Exposure amounts considered for regulatory purposes	148,354	132,368	2,288	13,824	(150)

 $<sup>^{1}</sup>$  Other differences include 3 months projected interest included in Advanced IRB Mortgage Model.

#### 11: Template EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)

As per Article 436 point (b) the following template provides information on entities which are treated differently under the accounting and regulatory scope of consolidation. In October 2019, Allied Irish Banks, p.l.c. acquired a majority stake in Semeral Limited a holding company for Payzone Ireland. The exposure to holdings in non-financial sector entities are subject to RWEA treatment.

а	b	С	d	е	f	g	h
	Method of		Method of	prudential co	nsolidation		Description of the entity
Name of the entity	accounting consolidation	Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
Semeral Limited	Full consolidation				х		Investment holding company
Payzone Ireland Limited	Full consolidation				x		Technology/payments platform

### 12: Table EU LIA - Explanations of differences between accounting and regulatory exposure amounts

As per Article 436, points (b) and (d), the table below provides information on the differences between accounting and regulatory exposure amounts.

Legal basis	Row number		Qualitative information
Article 436(b) CRR	(a)	Differences between columns (a) and (b) in template EU LI1	The difference between accounting and regulatory exposure amounts is due to entities which are treated differently under the accounting and regulatory scope of consolidation. Semeral Limited a holding company for Payzone Ireland is fully consolidated for accounting purposes. For regulatory purposes the exposure is subject to RWEA treatment as a holding in a non-financial sector entity.
Article 436(d) CRR		Qualitative information on the main sources of differences between the accounting and regulatory scope of consolidation shown in template EU LI2	The main sources of differences between the accounting and regulatory scope of consolidation shown in template EU LI2 are off balance sheet amounts, mainly netting, consideration of provisions, use of credit risk mitigation techniques, credit conversion factors and IFRS9 transitional adjustment.

## 13: Table EU LIB - Other qualitative information on the scope of application

As per Article 436, points (f), (g) and (h), the table below provides information on the scope of application.

Legal basis	Row number		Qualitative information
Article 436(f) CRR	(a)	Impediment to the prompt transfer of own funds or to the repayment of liabilities within the group	Allied Irish Banks, p.l.c. is the parent company of a number of licensed subsidiary banks which are subject to individual capital adequacy requirements. Each of the licensed subsidiaries are subject to minimum capital requirements imposed by their individual regulators. In order to maintain capital and/or liquidity ratios at or above the levels set down by their regulators, the licensed subsidiaries are unable to remit capital to the parent when to do so would result in such ratios being breached.
Article 436(g) CRR	(b)	Subsidiaries not included in the consolidation with own funds less than required	Not applicable, AIB has no subsidiaries not included in consolidation with own funds less than required.
Article 436(h) CRR	(c)	Use of derogation referred to in Article 7 CRR or individual consolidation method laid down in Article 9 CRR	AIB does not apply the derogation referred to in Article 7  The Central Bank of Ireland has adopted the national discretion under Article 9 of CRR concerning the ability of institutions to include certain subsidiaries in their individual regulatory returns. This treatment, termed 'solo consolidation', in effect, treats such subsidiaries as if they were branches of the parent rather than separate entities in their own right. There are certain criteria that must be met before the Central Bank will approve the inclusion of non-authorised subsidiaries in the 'solo consolidation'. Allied Irish Banks, p.l.c. has approval to prepare regulatory returns on a solo consolidation basis.
Article 436(g) CRR	(d)	Aggregate amount by which the actual own funds are less than required in all subsidiaries that are not included in the consolidation	Not applicable, AIB has no subsidiaries not included in consolidation with own funds less than required.

#### 14: Template EU PV1 - Prudent valuation adjustments (PVA)

As per Article 436 point (e), the template below provides a granular breakdown of the Prudent Valuation Adjustment (PVA).

Prudential Valuations (PV) require banks to consider an additional valuation adjustment (AVA) on top of their reported fair values, for prudential purposes. PVA captures valuation uncertainty. AlB use the Core approach for PVA measurement. PVA is a Common Equity Tier 1 capital deduction. CRR Articles 34 & 105 define regulatory principles that are applied to all fair valued assets and liabilities in order to determine a prudent valuation. The PVA is the difference between the financial statement fair valuation and the prudent valuation.

Increase in AVA between December 2023 and December 2024 is mainly due to an increase in Bond AVA.

		а	b	с	d	e	EU e1	EU e2	f	g	h
			ı	Risk category			Category level uncer	AVA - Valuation tainty			
	Category level AVA	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Total category level post- diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
1	Market price uncertainty	_	_	_	30	4	5	1	20	5	15
2	Not applicable										
3	Close-out cost	1	11	_	_	_	_	ı	11	1	11
4	Concentrated positions	-	-	-	3	_	-	ı	3	1	3
5	Early termination	_	_	_	_	_	_	-	_	_	-
6	Model risk	1	_	1	_	_	_	I	_	I	1
7	Operational risk	1	1	ı	4	0	_	I	5	1	4
8	Not applicable										
9	Not applicable										
10	Future administrative costs	_	_	_	_	_			_	-	_
11	Not applicable										
12	Total Additional Valuation Adjustments (AVAs)								39	6	33

# **Chapter 4. Disclosure of own funds**

## 15: Template EU CC1 - Composition of regulatory own funds

As per Article 437, points (a), (d), (e) and (f), the following template provides a breakdown of the constituent elements of AIB's fully loaded own funds. Regulatory adjustments comprise deductions from own funds and prudential filters. It includes a cross-reference to the corresponding rows in template EU CC2 to facilitate full reconciliation of accounting and regulatory own funds.

Main movements between June to December 2024 for CET1 decreases are as follows:

• CET1 remained relatively static. Capital includes profits materially offset by proposed dividend and share buyback.

Main movements between June to December 2024 for total risk exposures amounts (increased by € 1.1 bn) as detailed below:

- Operational risk increased by € 1.6 bn due to higher 3-year average income.
   Credit risk (excluding CCR) decreased by € 0.7 bn primarily due to the SRT (€ 0.7 bn) and implementation of the PPU for sovereign exposures (€ 0.6 bn), partly offset by new business outpacing redemptions (€ 0.6 bn).
- Market risk increased by € 0.2 bn mainly due to FX swaps.
- Securitisation risk and CCR remained relatively static.

All restrictions are applied to the calculation of own funds in accordance with CRR:

• The Group applies an Article 3 deduction of € 90 m at 31 December 2024, which is predominately driven by the application of calendar provisioning to legacy non-performing exposures. Calendar provisioning is a Supervisory Review and Evaluation Process 'SREP' recommendation to ensure minimum coverage levels on long term NPE exposures. The difference between the SREP recommended coverage levels and the IFRS 9 ECL coverage is taken as a CET1 deduction.

		(a)	(b)
		Amounts	Source based on reference numbers/ letters of the balance sheet under the regulatory scope of consolidation
	Common Equity Tier 1 (CET1) capital: instruments and	reserves	
1	Capital instruments and the related share premium accounts	1,455	38
	Of which: Ordinary stock	1,455	
2	Retained earnings	13,308	40
3	Accumulated other comprehensive income (and other reserves)	(2,917)	42
EU-3a	Funds for general banking risk	_	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	_	
5	Minority interests (amount allowed in consolidated CET1)	1	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	281	41
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	12,127	
	Common Equity Tier 1 (CET1) capital: regulatory adju	stments	
7	Additional value adjustments (negative amount)	(39)	
8	Intangible assets (net of related tax liability) (negative amount)	(548)	10
9	Not applicable		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(2,153)	15
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	121	43
12	Negative amounts resulting from the calculation of expected loss amounts	_	
13	Any increase in equity that results from securitised assets (negative amount)	I	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	_	
15	Defined-benefit pension fund assets (negative amount)	(26)	18
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	(5)	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	_	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	_	

EU-20d	, ,		
EU-20c EU-20d	of which: securitisation positions (negative amount) of which: free deliveries (negative amount)  Deferred tax assets arising from temporary differences (amount above 10%)	_	
21	threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	_	
22	Amount exceeding the 17,65% threshold (negative amount)		
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	_	
24	Not applicable		
25	of which: deferred tax assets arising from temporary differences	_	
EU-25a	Losses for the current financial year (negative amount)	_	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	_	
26	Not applicable		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	_	
27a	Other regulatory adjustments	(101)	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(2,751)	
29	Common Equity Tier 1 (CET1) capital	9,375	
	Additional Tier 1 (AT1) capital: instruments		
30	Capital instruments and the related share premium accounts	1,240	46
31	of which: classified as equity under applicable accounting standards of which: classified as liabilities under applicable accounting standards	1,240	
32	Amount of qualifying items referred to in Article 484 (4) CRR and the related		
EU-33a	share premium accounts subject to phase out from AT1  Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	_	
	Amount of qualifying items referred to in Article 494b(1) CRR subject to		
EU-33b		_	
EU-33b 34	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by	_ _ 	
34	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
34 35	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustment	•	
34 35	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	•	
34 35 36	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1	nents	
34 35 36 37	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution	nents	
34 35 36 37 38	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short	nents	
34 35 36 37 38	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)  Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative	nents	
34 35 36 37 38 39	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)  Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	nents	
34 35 36 37 38 39 40 41	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)  Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)  Not applicable  Qualifying T2 deductions that exceed the T2 items of the institution	nents	
34 35 36 37 38 39 40 41 42	phase out from AT1  Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties  of which: instruments issued by subsidiaries subject to phase out  Additional Tier 1 (AT1) capital before regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Additional Tier 1 (AT1) capital: regulatory adjustments  Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)  Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)  Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)  Not applicable  Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	nents	

45	Tier 1 capital (T1 = CET1 + AT1)	10,613	
	Tier 2 (T2) capital: instruments		
46	Capital instruments <sup>1</sup> and the related share premium accounts	1,661	36
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	l	
EU-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	_	
EU-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	ı	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		
49	of which: instruments issued by subsidiaries subject to phase out	_	
50	Credit risk adjustments	11	
51	Tier 2 (T2) capital before regulatory adjustments	1,672	
	Tier 2 (T2) capital: regulatory adjustments		
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	(3)	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
54a	Not applicable		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
56	Not applicable		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)		
EU-56b	Other regulatory adjustments to T2 capital	I	
57	Total regulatory adjustments to Tier 2 (T2) capital	(3)	
58	Tier 2 (T2) capital	1,670	
59	Total capital (TC = T1 + T2)	12,282	
60	Total Risk exposure amount	62,030	
	Capital ratios and requirements including buffe	ers	
61	Common Equity Tier 1 capital	15.11 %	
62	Tier 1 capital	17.11 %	
63	Total capital	19.80 %	
64	Institution CET1 overall capital requirement	11.41 %	
65	of which: capital conservation buffer requirement	2.50 %	
66	of which: countercyclical buffer requirement	1.44 %	
67	of which: systemic risk buffer requirement	<b>–</b> %	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	1.50 %	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.46 %	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	9.15 %	
	Amounts below the thresholds for deduction (before risk	k weighting)	
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	18	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	286	
74	Not applicable		

	Deferred tax accests arising from temperary differences (amount helew		
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	154	
	Applicable caps on the inclusion of provisions in T	Tier 2	
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	_	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	344	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	11	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	152	
	Capital instruments subject to phase-out arrangements (only applicable between	ween 1 Jan 2014 and 1	. Jan 2022)
80	Current cap on CET1 instruments subject to phase out arrangements	_	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	_	
82	Current cap on AT1 instruments subject to phase out arrangements	_	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	_	
84	Current cap on T2 instruments subject to phase out arrangements	_	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	_	

<sup>&</sup>lt;sup>1</sup>In December 2024 Non-CET1 own fund instruments include accrued interest and fair value hedge adjustments in line with the EBA report on the monitoring of Additional Tier 1, Tier 2 and TLAC/MREL Eligible Liabilities instruments of EU institutions published on 27th June 2024 (paragraphs 144 to 162).

# 16: Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

As per Article 437 point (a), the following template outlines the differences between the scope of accounting consolidation and the scope of regulatory consolidation, showing the link between AIB's balance sheet in the audited financial statements and the numbers that are used in the composition of own funds disclosure template (EU CC1).

Reference   Statements   Stat				b	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements			audited financial	Under regulatory scope	Reference
1   Cash and balances at central banks   37,315   37,31			As at period end	As at period end	
2		Assets - Breakdown by asset classes according to the bal	ance sheet in the publish	ed financial statements	
3   Derivative financial instruments	1	Cash and balances at central banks	37,315	37,315	
4   Loans and advances to banks	2	Trading portfolio financial assets	136	136	
5   Loans and advances to customers	3	Derivative financial instruments	2,144	2,144	
6   Securities financing	4	Loans and advances to banks	1,321	1,321	
Total assets	5	Loans and advances to customers	69,889	69,889	
8	6	Securities financing	6,643	6,643	
9   Intangible assets and goodwill   934   848   10   0   0   which are deducted from Own funds   548   8   11   Property, plant and equipment   516   513   12   12   12   12   13   13   13	7	Investment securities	18,668	18,668	
10   Of which are deducted from Own funds	8	Investments accounted for using the equity method	348	348	
11	9	Intangible assets and goodwill	934	848	
12   Other assets	10	Of which are deducted from Own funds		548	8
13	11	Property, plant and equipment	516	513	
14   Deferred tax assets	12	Other assets	475	458	
15	13	Current taxation	21	21	
16   Prepayments and accrued income   522   522   17   Retirement benefit assets   31   31   31   31   31   31   31   3	14	Deferred tax assets	2,303	2,302	
16   Prepayments and accrued income   522   522   17   Retirement benefit assets   31   31   31   31   31   31   31   3	15	Of which are deducted from Own funds	·	2,153	10
17   Retirement benefit assets   31   31   31   18   Of which are deducted from Own funds   26   15   15   102	16		522	522	
19	17	1 1	31	31	
19	18	Of which are deducted from Own funds		26	15
Total assets			_		
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements	20		141.266		
21   Deposits by central banks and banks   836   836   22   Customer accounts   109,883   109,906   23   Securities financing   196   196   196   24   Trading portfolio financial liabilities   262   262   252   252   Derivative financial instruments   1,807   1,807   1,807   26   Debt securities in issue   8,832   8,832   8,832   27   Lease liabilities   258   257   27   Lease liabilities   268   258   257   27   28   Fair value changes of hedged items in portfolio hedges of interest rate risk   64   64   64   29   Current taxation   2   2   2   2   2   2   2   2   30   Deferred tax liabilities   14   13   13   13   Retirement benefit liabilities   9   9   9   9   9   9   9   9   9		Liabilities - Breakdown by liability classes according to the			
22	21		-		
23         Securities financing         196         196           24         Trading portfolio financial liabilities         262         262           25         Derivative financial instruments         1,807         1,807           26         Debt securities in issue         8,832         8,832           27         Lease liabilities         258         257           28         Fair value changes of hedged items in portfolio hedges of interest rate risk         64         64           29         Current taxation         2         2         2           30         Deferred tax liabilities         14         13         13         14         13         13         14         13         13         14         13         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         13         14         14         13         14         14         13         14         14         14         14<	22	· · · ·	109,883	109,906	
24         Trading portfolio financial liabilities         262         262           25         Derivative financial instruments         1,807         1,807           26         Debt securities in issue         8,832         8,832           27         Lease liabilities         258         257           28         Fair value changes of hedged items in portfolio hedges of interest rate risk         64         64           29         Current taxation         2         2           30         Deferred tax liabilities         14         13           31         Retirement benefit liabilities         9         9           32         Other liabilities         9         9           32         Other liabilities and commitments         203         203           33         Accruals and deferred income         735         725           34         Provisions for liabilities and commitments         203         203           35         Subordinated liabilities and other capital instruments         1,627         1,627           36         Of which are allowable for own funds purposes         1,661         46           37         Total liabilities         125,839         125,829           Shareholders Equity	23	Securities financing		196	
25         Derivative financial instruments         1,807         1,807           26         Debt securities in issue         8,832         8,832           27         Lease liabilities         258         257           28         Fair value changes of hedged items in portfolio hedges of interest rate risk         64         64           29         Current taxation         2         2           30         Deferred tax liabilities         14         13           31         Retirement benefit liabilities         9         9           32         Other liabilities         1,111         1,085           33         Accruals and deferred income         735         725           34         Provisions for liabilities and commitments         203         203           35         Subordinated liabilities and other capital instruments         1,627         1,627           36         Of which are allowable for own funds purposes         1,661         46           37         Total liabilities         125,839         125,824           Shareholders' Equity           38         Share capital         1,455         1,455         1           39         Reserves         12,742         12,752      <	24	-	262	262	
26         Debt securities in issue         8,832         8,832           27         Lease liabilities         258         257           28         Fair value changes of hedged items in portfolio hedges of interest rate risk         64         64           29         Current taxation         2         2           30         Deferred tax liabilities         14         13           31         Retirement benefit liabilities         9         9           32         Other liabilities         1,111         1,085           33         Accruals and deferred income         735         725           34         Provisions for liabilities and commitments         203         203           35         Subordinated liabilities and other capital instruments         1,627         1,627           36         Of which are allowable for own funds purposes         1,661         46           37         Total liabilities         125,839         125,824           Shareholders' Equity         1,455         1,455         1           38         Share capital         1,455         1,455         1           39         Reserves         12,742         12,752           40         Of which Retained earnings         13	25		1,807	1,807	
28         Fair value changes of hedged items in portfolio hedges of interest rate risk         64         64           29         Current taxation         2         2           30         Deferred tax liabilities         14         13           31         Retirement benefit liabilities         9         9           32         Other liabilities         1,111         1,085           33         Accruals and deferred income         735         725           34         Provisions for liabilities and commitments         203         203           35         Subordinated liabilities and other capital instruments         1,627         1,627           36         Of which are allowable for own funds purposes         1,661         46           37         Total liabilities         125,839         125,824           Shareholders' Equity           Share capital         1,455         1,455         1           39         Reserves         12,742         12,752           40         Of which Retained earnings         13,308         2           41         Of which AOCI and other Reserves         (2,917)         3           42         Of which AOCI and other Reserves         (2,917)         3	26	Debt securities in issue	·		
29   Current taxation   2   2   2   30   Deferred tax liabilities   14   13   31   Retirement benefit liabilities   9   9   9   9   32   Other liabilities   1,111   1,085   33   Accruals and deferred income   735   725	27	Lease liabilities	258	257	
30       Deferred tax liabilities       14       13         31       Retirement benefit liabilities       9       9         32       Other liabilities       1,111       1,085         33       Accruals and deferred income       735       725         34       Provisions for liabilities and commitments       203       203         35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       13,308       2       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity inte	28		64	64	
31       Retirement benefit liabilities       9       9         32       Other liabilities       1,111       1,085         33       Accruals and deferred income       735       725         34       Provisions for liabilities and commitments       203       203         35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       12,742       12,752       1         40       Of which Current year Profit less foreseeable charges       281       EU-5a         41       Of which AOCI and other Reserves       (2,917)       3         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45	29	Current taxation	2	2	
32       Other liabilities       1,111       1,085         33       Accruals and deferred income       735       725         34       Provisions for liabilities and commitments       203       203         35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests </td <td>30</td> <td>Deferred tax liabilities</td> <td>14</td> <td>13</td> <td></td>	30	Deferred tax liabilities	14	13	
33       Accruals and deferred income       735       725         34       Provisions for liabilities and commitments       203       203         35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total	31	Retirement benefit liabilities	9	9	
34       Provisions for liabilities and commitments       203       203         35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,437	32	Other liabilities	1,111	1,085	
34       Provisions for liabilities and commitments       203       203         35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,437	33	Accruals and deferred income		·	
35       Subordinated liabilities and other capital instruments       1,627       1,627         36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	34	Provisions for liabilities and commitments	203	203	
36       Of which are allowable for own funds purposes       1,661       46         37       Total liabilities       125,839       125,824         Shareholders' Equity         38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       1         40       Of which Retained earnings       2       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437					
37       Total liabilities       125,839       125,824         Shareholders' Equity       38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752       12,752         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	36	·			46
38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	37	Total liabilities	125,839	125,824	
38       Share capital       1,455       1,455       1         39       Reserves       12,742       12,752         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	Shareho	lders' Equity			
39       Reserves       12,742       12,752         40       Of which Retained earnings       13,308       2         41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	38	Share capital	1,455	1,455	1
41       Of which Current year Profit less foreseeable charges       281       EU-5a         42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	39	Reserves	12,742		
42       Of which AOCI and other Reserves       (2,917)       3         43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	40	Of which Retained earnings		13,308	2
43       Of which Cash flow hedges deducted from own funds       (121)       11         44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	41	Of which Current year Profit less foreseeable charges		281	EU-5a
44       Total shareholders' equity       14,197       14,207         45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	42	Of which AOCI and other Reserves		(2,917)	3
45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	43	Of which Cash flow hedges deducted from own funds		(121)	11
45       Other equity interests       1,239       1,239         46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	44		14,197	1	
46       Of which are allowable for own funds purposes       1,240       30         47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	45		1,239		
47       Non-controlling interests       (9)       (9)         48       Total equity       15,427       15,437	46		·		30
48 Total equity 15,427 15,437	47		(9)	·	
	48	<u> </u>			
	49	Total liabilities and equity	141,266	141,261	

# 17: Table EU CCA - Main features of regulatory own funds instruments and eligible liabilities

As per Article 437 points (b) and (c) the following template outlines the main features of Common Equity Tier 1 instruments, Additional Tier 1 instruments and Tier 2 instruments.

	Instrument name	<b>Ordinary shares</b>	€500m callable subordinated step-up floating rate notes due October 2017 (maturity extended to 2035 as a result of the SLO)	£368m subordinated notes due June 2019 (maturity extended to 2035 as a result of the SLO)	£500m subordinated callable fixed/ floating rate notes due March 2025 (maturity extended to 2035 as a result of the SLO)	€625m additional tier 1 perpetual contingent temporary write down securities	€1,000m subordinated tier 2 notes due 2031, callable 2026	€625m additional tier 1 perpetual contingent temporary write down securities	€650m subordinated tier 2 notes due 2035, callable 2030
1	Issuer	AIB Group plc	Allied Irish	Allied Irish	Allied Irish	AIB Group plc	AIB Group plc	AIB Group plc	AIB Group plc
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	IEOOBFOL3536	Banks, p.l.c. XS0232498393	Banks, p.l.c. XS0435957682	Banks, p.l.c. XS0214107053	XS2010031057	XS2230399441	XS2808268390	XS2823235085
2a	Public or private placement	Public	Public	Public	Public	Public	Public	Public	Public
3	Governing law(s) of the instrument	Irish Law	English Law, with subordination governed by Irish law	English Law, with subordination governed by Irish law	English Law, with subordination governed by Irish law	Irish Law	Irish Law	Irish Law	Irish Law
3a Regu	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A	N/A	Yes	Yes	Yes	Yes
4	Current	Common Equity	N/A	Tier 2	Tier 2	Additional Tier 1	Tier 2	Additional Tier	Tier 2
7	treatment taking into account, where applicable, transitional CRR rules	Tier 1		THE 12	110.12	Additional Net 1	1101 2	1	mei 2
5	Post-transitional CRR rules	Common Equity Tier 1	N/A	Tier 2	Tier 2	Additional Tier 1	Tier 2	Additional Tier 1	Tier 2
6	Eligible at solo/ (sub-)consolidat ed/solo &(sub-)consolid ated	Group and solo	Group and solo	Group and solo	Group and solo	Group and solo (the external issuance is downstreamed to Allied Irish Banks, p.l.c. in similar format)	Group and solo (the external issuance is downstreamed to Allied Irish Banks, p.l.c. in similar format)	Group and solo (the external issuance is downstreamed to Allied Irish Banks, p.l.c. in similar format)	Group and solo (the external issuance is downstreamed to Allied Irish Banks, p.l.c. in similar format)
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Subordinated notes	Subordinated notes	Subordinated notes	Additional Tier 1	Tier 2	Additional Tier 1	Tier 2
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	€1,455 m	NIL	NIL	NIL	€619 m (net of transaction costs)	€1,000 m	€620 m (net of transaction costs)	€650 m
9	Nominal amount of instrument	€1,455 m	€0.3 m	£2.7 m	£0.1 m	€625 m	€1,000 m	€625 m	€650 m
EU- 9a	Issue price	€0.625 each (current issue price)	99.935	100	99.321	Par	99.952	Par	99.559
EU- 9b	Redemption price	Non- redeemable	Nominal amount	Nominal amount	Nominal amount	Par	Par	Par	Par
10	Accounting classification	Shareholders' equity	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Equity - other equity interest	Liability - amortised cost	Equity - other equity interest	Liability - amortised cost
11	Original date of issuance	Multiple (ordinary shares)	24/10/2005	25/06/2009	10/03/2005	23/06/2020	30/09/2020	30/04/2024	20/05/2024
12	Perpetual or dated	Perpetual	Dated	Dated	Dated	Perpetual	Dated	Perpetual	Dated
13	Original maturity date	No maturity	24/10/2035	25/06/2035	10/03/2035	No maturity	30/05/2031	No maturity	20/05/2035

14	Issuer call subject to prior supervisory approval	N/A	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	From interest payment date October 2012	N/A	From interest payment date March 2020	23/06/2025	30/05/2026	30/10/2029	20/05/2030
16	Subsequent call dates, if applicable	N/A	Quarterly thereafter	N/A	Quarterly thereafter	23 June 2025 to First Reset Date (23 December 2025) or any Interest Payment Date thereafter	N/A	30 October 2029 to First Reset Date (30 October 2029) or any Interest Payment Date thereafter	N/A
Coup	ons / dividends								
17	Fixed or floating dividend/ coupon	N/A	N/A	N/A	N/A	Fixed	Fixed	Fixed	Fixed
18	Coupon rate and any related index	N/A	N/A	N/A	N/A	0.0625	0.02875	0.07125	0.04625
19	Existence of a dividend stopper	No	No	No	No	No however payment of coupon on AT1 is fully discretionary	No	No however payment of coupon on AT1 is fully discretionary	No
EU- 20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Mandatory	Fully discretionary	Mandatory
EU- 20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Mandatory	Fully discretionary	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Non-cumulative or cumulative	N/A	N/A	N/A	N/A	Non-cumulative	Cumulative	Non- cumulative	Cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non- convertible	Non- convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	No	No	No	No	Yes	No	Yes	No
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	N/A	If the consolidated CET1 ratio of AIB Group plc. at any time falls below 7% (a trigger event), subject to certain conditions, the AT1 instrument will be written down in whole or in part	N/A	If the consolidated CET1 ratio of AIB Group plc. at any time falls below 7% (a trigger event), subject to certain conditions, the AT1 instrument will be written down in whole or in part	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	Fully or partially	N/A	Fully or partially	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	Temporary	N/A	Temporary	N/A

34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	To the extent permitted in order to comply with regulatory capital and other requirements, AIB Group plc. may at its sole and full discretion reinstate any previously written down amount.	N/A	To the extent permitted in order to comply with regulatory capital and other requirements, AIB Group plc. may at its sole and full discretion reinstate any previously written down	N/A
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EU- 34b	Ranking of the instrument in normal insolvency proceedings	1	2(b)	2(b)	2(b)	2(a)	2(b)	2(a)	2(b)
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Most junior Instrument type immediately senior: AT1	Subordinated in right of payment to ordinary creditors, including depositors.  Instrument type immediately senior: Senior Non Preferred Notes	to ordinary creditors, including depositors. Instrument type immediately senior: Senior Non Preferred Notes	Subordinated in right of payment to ordinary creditors, including depositors. Instrument type immediately senior: Senior Non Preferred Notes	carry voting rights, rank pari passu with holders of other tier 1 instruments (excluding ordinary shares). They rank ahead of the holders of ordinary share capital but junior to the claims of Tier 2 investors and Senior Creditors.  Instrument type immediately senior: Dated Subordinated Notes	Senior to Tier 1 instruments and junior to Senior Creditors Instrument type immediately senior: Senior Non Preferred Notes	holders of other tier 1 instruments (excluding ordinary shares). They rank ahead of the holders of ordinary share capital but junior to the claims of Tier 2 investors and Senior Creditors.  Instrument type immediately senior: Dated	Senior to Tier 1 instruments and junior to Senior Creditors Instrument type immediately senior: Senior Non Preferred Notes
36	Non-compliant transitioned features	No	No	No	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	Please see excel Pillar 3 book for link: 1. AIB HoldCo Prospectus	Please see excel Pillar 3 book for link: SERIES 50 ISIN XS232498393 EMTN 2005	Please see excel Pillar 3 book for link: EMTN.090623.Fi nal Terms (Series 109)	Please see excel Pillar 3 book for link: EMTN.050308.Fi nal Terms (Series 43)	€625m additional tier 1 perpetual contingent temporary write down securities	€1,000m subordinated tier 2 notes due 2031, callable 2026	€625m additional tier 1 perpetual contingent temporary write down securities	€650m subordinated tier 2 notes due 2035, callable 2030

Chapter 5. Disclosure of countercyclical capital buffers

As per Article 440(a), the following template sets out geographical distribution of credit exposures relevant to the calculation of the countercyclical capital buffer. The template contains an overview of the exposure distribution for all countries. The relevant credit exposures include all the classes of exposure other than those under Article 112, letters from a) to 10, of regulation (EU) 575/2013. The following portfolios are excluded: exposures to central administrations or central banks; exposures to international organisation; exposures to international organisation; exposures to international organisations; exposures to international organisatio

General credit exposures Relevant credit exposures – Market risk Securitisation Fynosure Sum of long Value of exposures Total Relevant credit redit re															
			a	b	_	d	e	f	g	h	i	j	k	ı	m
Part			General cred	lit exposures						Own fund r	equirements				
Professor   Section   Se			value under	Exposure	Sum of long and short	Value of trading book	exposures Exposure	exposure	Relevant	Relevant	credit exposures –		exposure	requirements weights	Countercyclical buffer rate
Section   1.5			the standardised	the IRB	trading book exposures for	exposures for internal		value	exposures -	exposures -	Securitisation positions in the non-	Total	amounts	(%)	(%)
United Sequent 0.02   7.297   3.792       0.8488   7.288       7.28   8.595   7.2785   0.0000	010	Breakdown by country:													
Angele College					936						50				1.50 %
Append 200				3,791	-					-	-				2.00 %
Approximation	$\vdash$			_	-					-	-				- %
Auritio (1977   1978   1979	$\vdash$			_	_					_	_				- %
August 207   0   3       3   0       0   2   0.000	$\vdash$			-							_				- %
Bahran 200	$\vdash$				_					_	_				1.00 %
Behander: 002	$\vdash$				<del></del>										- %
Begins 2015   0	$\vdash$			0	_					_	_				- %
Replace 132															- %
Bernard (13)				_	_		_			_	_				- %
Description   Part		Belgium : 012	1	50	-		_	50	5	_	-	5	62	0.12%	1.00 %
Mentagonical Colds		Bermuda: 013	0	_	-		-	0	0	_	-	0	0	0.00%	- %
Secret Descriptions		Bosnia and	0	_	_		_	0	0	_	_	0	0	0.00%	- %
Benefit Control (17	$\vdash$		0	0									-		- %
Oracle   1972	$\vdash$										_				
Caption Studies: 039															- %
Chine 1989					-					_	-				2.00 %
Color-1021					-						-				- %
Construction   Cons	$\sqcup$														- %
Contract 022	$\vdash \vdash$			2							-				- %
Cords   Final 1/23	$\vdash \vdash$														- %
Condes 1028	$\vdash$				_						_				- %
Copyris 2625	$\vdash$														- %
Correl Republic (277   0	$\vdash$														1.50 %
Cereb Republic (327)	$\vdash$				<del></del>					<del>-</del> -					1.00 %
Demmark 1028	$\vdash$				<del></del>					<del></del>	<del>-</del> -				1.00 %
Egypti CO29	$\vdash$														2.50 %
Finance (301					_					_	_				- %
Fineland: 031				_	_		_			_	_				1.50 %
Germany 1034   55   413				59	_		_			_	_				- %
Germany : 044   55		France : 032	87	942	-		28	1,057	72	_	-	72	903	1.76%	1.00 %
General Crist			0	0	-		-	0	0	-	-	0	0	0.00%	- %
Guerney: 035   32   49       80   9       9   110   0.21%		Germany: 034	55	413	-		_	467	35	-	-	35	433	0.84%	0.75 %
Modified Official City   Description   Color		Greece : 035		-	_		_	0		_	-		0	0.00%	- %
Moly Seet (Valician City   State) 2088					-					-	-				- %
Stocke) 1088   0	$\sqcup$		0	_	_		-	0	0	_	-	0	0	0.00%	- %
Hongs Kong: (39)   1			0	_	_		_	0	0	_	_	0	0	0.00%	- %
Hungary 040	$\vdash$		1	0	_		_	1	0	_	_	0	0	0.00%	1.00 %
India-041   0			0	_				0			_		0		0.50 %
Interest : 0.43		India : 041	0	0	_		_	0	0	_	-	0	0	0.00%	- %
Taby: 044   34   82       116   8       8   104   0.20%     Japan 055   0   1       0   0   0   0.00%     Japan 056   48   49     39   136   8     9   109   0.21%     Jordan 077   0       0   0   0     0   0		Isle Of Man: 042	74	160	-		-	234	19	-	-	19	235	0.46%	- %
Japan : 045		Israel : 043	-	-	-		_	-	0	-	_	0		0.00%	- %
Jersey: 046															- %
Jurdan: 047					_					_	-				- %
Kazabhstan:088	$\vdash$				-					_	-				- %
Kerwys - 049	$\vdash$										-				- %
Norea, Republic Of:   0	$\vdash$										_				- % - %
0500   0	$\vdash$				_						_				
Littvia: 052		050	0	_	_		_	0	0	-	_	0	0	0.00%	1.00 %
Lebanon: 053				0							_				- %
Lithuania: 056	$\Box$			_	-										0.50 %
Luxembourg:055	$\Box$						_								- %
Macao: 056	$\vdash$						-								1.00 %
Malaysia :057	$\vdash$				-		-			_	-				0.50 %
Malta: 058	$\vdash$														- % - %
Mauritius: 059	$\vdash$										H = -				- % - %
Mayotte: 060	$\vdash$										_				- %
Monaco : 061	$\vdash$														- %
Namibia : 062	$\Box$														- %
Netherlands : 063   102   405     93   600   45     5   49   617   1.20%															- %
Nicaragua : 065   0   0   -   -   -   0   0   -   -   0   0		Netherlands : 063			_		93		45	_	5			1.20%	2.00 %
Norway: 066   0   56       56   4       4   54   0.11%															- %
Pakistan: 067	$\Box$														- %
Paraguay: 068	$\sqcup$									-	-				2.50 %
Peru : 069	$\sqcup$									_	-				- %
Philippines: 070   0       0   0       0   0	$\vdash$														- %
Poland : 071	$\vdash$				-					_					- %
Portugal: 072   0   53   -	$\vdash$				_										- % - %
Qata: :073         0         -         -         0         0         -         0         0         0.00%           Romania: 074         0         -         -         0         0         -         -         0         0         0.00%           Russian Federation: 075         0         -         -         0         0         -         -         0         0         0.00%           Saudi Arabia: 076         0         0         -         -         0         0         -         -         0         0         0.00%           Singapore: 077         1         -         -         -         1         0         -         -         0         0         0.00%           Silveakia: 078         0         -         -         -         0         0         -         -         0         0         0.00%           Silveakia: 078         0         -         -         -         0         0         -         -         0         0         0.00%           Silveakia: 078         0         -         -         -         0         0         -         -         0         0         0.00%	$\vdash$														- % - %
Romania : 074	$\vdash$														— % — %
Russian Federation: 0 0 0 0 0 0 0 0.00%  Saudi Arabia : 076 0 0 0 0 0 0 0 0 0.00%  Singapore: 077 1 1 0 0 0 0 0 0.00%  Singapore: 077 1 1 0 0 0 0 0.00%  Slovakia : 078 0 0 0 0 0 0 0 0.00%  Slovakia : 078 0 0 0 0 0 0 0 0.00%  Slovenia : 079 0 0 0 0 0 0 0.00%  South Africa : 080 0 0 1 0 0 0 0 0 0.00%  Spain: 081 63 229 292 21 21 267 0.52%  Sweden: 082 0 104 104 9 9 113 0.22%	$\vdash$														1.00 %
O75   O	$\vdash$														
Singapore: 077   1	$\Box$	075													- %
Slovakia: 078   0       0   0       0   0	$\Box$														- %
Slovenia: 079   0	$\sqcup$														- %
South Africa: 080         0         0         -         -         1         0         -         -         0         0.00%           Spain: 081         63         229         -         -         292         21         -         -         21         267         0.52%           Sweden: 082         0         104         -         -         104         9         -         -         9         113         0.22%	$\sqcup$														1.50 %
Spain: 081         63         229         -         -         292         21         -         -         21         267         0.52%           Sweden: 082         0         104         -         -         104         9         -         -         9         113         0.22%	$\vdash \vdash$				_										0.50 %
Sweden: 082 0 104 104 9 9 113 0.22%	$\vdash$														- %
	$\vdash$														- %
Switzerlatio 1.005   3   34   -     -   9/   8   -   -   8   97   0.19%	$\vdash$														2.00 %
Thailand: 084 0 0 0 0 0 0.00%	$\vdash$														- % - %

	Turkey: 085	0	_	_	_	0	0	_	_	0	0	0.00%	- %
	Uganda : 086	0	-	-	_	0	0	-	_	0	0	0.00%	- %
	Ukraine : 087	0	_	_	-	0	0	_	_	0	0	0.00%	- %
	United Arab Emirates : 088	1	0	-	-	2	0	-	-	0	1	0.00%	- %
	United States : 089	255	2,971	_	901	4,126	222	_	12	234	2,926	5.70%	- %
	Venezuela : 090	0	_	_	_	0	0	_	-	0	0	0.00%	- %
	Vietnam: 091	0	_	_	-	0	0	_	_	0	0	0.00%	- %
	Virgin Islands, British: 092	0	-	-	-	0	0	-	-	0	0	0.00%	- %
	Zambia : 093	0	_	_	-	0	0	_	-	0	0	0.00%	- %
	Zimbabwe : 094	0	_	_	_	0	0	_	_	0	0	0.00%	- %
020	Total	40,668	39,206	936	3,112	83,921	4,037	6	67	4,110	51,378	100.00%	- %

<sup>&</sup>lt;sup>1</sup> Includes exposures to countries outside of Ireland but all are allocated to Ireland as trading book exposures represent less than 2% of the aggregate risk weighted exposures.

# 19: Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer

As per Article 440 point (b), the following template provides the additional countercyclical capital buffer requirement.

		a
1	Total risk exposure amount <sup>1</sup>	62,030
2	Institution specific countercyclical capital buffer rate	1.44%
3	Institution specific countercyclical capital buffer requirement	895

<sup>&</sup>lt;sup>1</sup> This includes all credit risk (including counterparty credit risk and securitisations), operational risk, market risk & CVA.

Chapter 6. Disclosure of the leverage ratio

#### 20: Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio

As per Article 451(1) point (b), the following template provides a reconciliation of the total assets in AIB Group audited financial statements under IFRS and the total leverage exposure. The template includes a breakdown of all adjustments that lead from the total assets as reported in the audited financial statements to the LR exposure measure on a fully loaded basis.

Main movements between June to December 2024 are as follows:

- Total assets increased € 4.3 bn primarily driven by customer loans (€ 2.5 bn), increase in cash and balances at central banks (€ 1.3 Total assets increased € 4.5 bit primarily driven by customer loans (€ 2.5 bit), increase in cash and balance bit) and increased investment securities (€ 0.4 bit), partly offset by reduction in deferred tax assets (€ 0.2 bit).
   The movement in off-balance sheet relates to increases in underlying business activity.

Applicable amount Total assets as per published financial statements 141,266 1 Adjustment for entities which are consolidated for accounting purposes but are outside 2 the scope of prudential consolidation (5) (Adjustment for securitised exposures that meet the operational requirements for the 3 recognition of risk transference) 4 (Adjustment for temporary exemption of exposures to central banks (if applicable)) (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the 5 applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR) Adjustment for regular-way purchases and sales of financial assets subject to trade date 6 accounting 7 Adjustment for eligible cash pooling transactions 8 Adjustment for derivative financial instruments 1,609 9 Adjustment for securities financing transactions (SFTs) 68 Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of 10 off-balance sheet exposures) 5.290 (Adjustment for prudent valuation adjustments and specific and general provisions 11 which have reduced Tier 1 capital) (Adjustment for exposures excluded from the total exposure measure in accordance EU-11a with point (c) of Article 429a(1) CRR) (Adjustment for exposures excluded from the total exposure measure in accordance EU-11b with point (j) of Article 429a(1) CRR) Other adjustments 1 (2,618) 12 145,609 Total exposure measure 13

<sup>1</sup> Other adjustments mainly relate to asset amounts deducted in determining Tier 1 capital for example deferred tax asset and intangible assets.

## 21: Template EU LR2 - LRCom: Leverage ratio common disclosure

As per Article 451(1), points (a) and (b) and Article 451(3) (taking into account, where applicable, point (c) of Article 451(1) and Article 451(2) CRR), the following template provides a detailed breakdown of the components of the LR denominator, as well as information on the actual LR, minimum requirements and buffers. Article 451(2) is not applicable to AIB, as AIB is not a public development credit institution as defined in Article 429a(2). Transitional and fully loaded capital ratios are aligned from June 2024, prior periods were transitional. AIB does not have any promotional loan exposures.

The LR decreased over the half year due to higher total exposures and marginally lower Tier 1 capital.

		CRR leverage ra	tio exposures
		a	b
		31/12/2024	30/06/2024
	On-balance sheet exposures (excluding de	rivatives and SFTs)	
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	132,690	128,551
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	_	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	_
4	Adjustment for securities received under securities financing transactions that are recognised as an asset	-	_
5	(General credit risk adjustments to on-balance sheet items)	-	_
6	(Asset amounts deducted in determining Tier 1 capital)	(2,834)	(2,941)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	129,856	125,610
	Derivative exposures		
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	2,968	2,694
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	_
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	785	748
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	_	_
EU-9b	Exposure determined under Original Exposure Method	-	_
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	_
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	_
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original Exposure Method)	-	_
11	Adjusted effective notional amount of written credit derivatives	_	_
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	_	_
13	Total derivatives exposures	3,753	3,442
	Securities financing transaction (SFT	) exposures	
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	8,324	9,418
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(1,681)	(2,735)
16	Counterparty credit risk exposure for SFT assets	68	306
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	_	_
17	Agent transaction exposures	_	
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)		
18	Total securities financing transaction exposures	6,711	6,990
	Other off-balance sheet expo	sures	
19	Off-balance sheet exposures at gross notional amount	17,794	17,328
20	(Adjustments for conversion to credit equivalent amounts)	(12,446)	(12,215)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	(57)	(61)
22	Off-balance sheet exposures	5,290	5,052
	Excluded exposures		

EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	_	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off-balance sheet))	_	_
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	_	_
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	_	_
EU-22e	(Excluded passing-through promotional loan exposures by non- public development banks (or units))	_	_
EU-22f	(Excluded guaranteed parts of exposures arising from export credits )	_	_
EU-22g	(Excluded excess collateral deposited at triparty agents )	_	_
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	_	_
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	_	_
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans )	_	_
EU-22k	(Total exempted exposures)	-	_
	Capital and total exposure m	easure	
23	Tier 1 capital	10,613	10,659
24	Total exposure measure	145,609	141,093
	Leverage ratio		
25	Leverage ratio (%)	7.29 %	7.55 %
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7.29 %	7.55 %
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	7.29 %	7.55 %
26	Regulatory minimum leverage ratio requirement (%)	3.00 %	3.00 %
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	<b>–</b> %	<b>-</b> %
EU-26b	of which: to be made up of CET1 capital	<b>-</b> %	<b>-</b> %
27	Leverage ratio buffer requirement (%)	<b>-</b> %	<b>-</b> %
EU-27a	Overall leverage ratio requirement (%)	3.00 %	3.00 %
	Choice on transitional arrangements and	relevant exposures	
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Fully loaded	Fully loaded
	Disclosure of mean value	es	
28	Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	6,242	6,430
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated	6,643	6,684
30	cash payables and cash receivables  Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	145,208	140,840
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	145,208	140,840
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.31 %	7.57 %
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.31 %	7.57 %

# 22: Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

As per Article 451(1) point (b) the following template analyses the calculation of the leverage ratio exposures on a fully loaded basis.

		а
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	132,690
EU-2	Trading book exposures	136
EU-3	Banking book exposures, of which:	132,554
EU-4	Covered bonds	4,859
EU-5	Exposures treated as sovereigns	45,680
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	_
EU-7	Institutions	3,032
EU-8	Secured by mortgages of immovable properties	43,749
EU-9	Retail exposures	5,154
EU-10	Corporates	19,302
EU-11	Exposures in default	1,370
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	9,407

# 23: Table EU LRA - Disclosure of LR qualitative information

As per Article 435(1), points (d) and (e) the table below provides qualitative information the management of the risk of excessive leverage and factors that had an impact on the leverage ratio during the period.

Row number		Qualitative information
(a)	Description of the processes used to manage the risk of excessive leverage	As per Article 451(1)(d) the Group ensures the avoidance of excessive leverage through its capital allocation process as part of the annual financial planning process. The use of capital and risk adjusted return on capital by business area is monitored at the Asset & Liability Committee ("ALCo") at each meeting, and updates are provided by the CFO to the Board on a quarterly basis. In addition to limits for usage of capital, the ALCo monitors an overall Group leverage risk appetite limit.
(b)	Description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers	As per Article 451(1)(e) the transitional leverage ratio decreased to 7.3% at 31 December 2024 from 7.6% at 30 June 2024.  Main movements between June to December 2024 are as follows:  •Total assets increased € 4.3 bn primarily driven by customer loans (€ 2.5 bn), increase in cash and balances at central banks (€ 1.3 bn) and increased investment securities (€ 0.4 bn), partially offset by reduction in deferred tax assets (€ 0.2 bn).  •The movement in off-balance sheet relates to increases in underlying business activity.

# **Chapter 7. Disclosure of liquidity requirements**

# 24: Table EU LIQA - Liquidity risk management

As per Article 435(1) and Article 451a(4) the table below provides information on the Groups liquidity risk management.

Row		
number		Qualitative Information
(a)	Strategies and processes in the management of the liquidity risk, including policies on diversification in the sources and tenor of planned funding,	• Liquidity and Funding risk is identified and assessed by the Groups MRA process in support of the Internal Liquidity Adequacy Assessment Process ('ILAAP'). The MRA process is a 'Top-Down' assessment performed on at least an annual basis and identifies the key material risks to the Group, taking into account its strategic objectives, in addition to internal and external risk information.
		The Group RAS is an articulation of the nature and extent of risk that the Group is willing to take, accept or tolerate in pursuit of its business objectives and strategy as set by the Board. The Group's risk profile is measured against its risk appetite and adherence to the Group RAS is reported to the Board on a monthly basis.
		The Group RAS consists of a series of Level 1 RAS metrics and supporting Level 2 KRIs. Group Level 1 metrics address the key strategic risks to the Group, reflecting business model, size and complexity of the Group and which require oversight by the Board. Group Level 1 metrics are supported by a series of Group Level 2 metrics or KRIs. Level 2 Group KRIs support Level 1 Group RAS metrics by providing additional breakdown of the key strategic risks. The escalation process as stipulated under the Risk Appetite policy is commenced in the event of a breach of either the RAS watch trigger or limit for any of the metrics. This ensures Board and Regulator notification within approved timeframes.
		The ILAAP is fully integrated and embedded in the strategic, financial and risk management processes of the Group. Embedding of the ILAAP is facilitated through the setting of risk appetite, liquidity and funding planning and the dynamic review thereof in light of key strategic decisions.
		The Group has a comprehensive ILAAP Framework for managing the Group's liquidity risk and complying with the Board's risk appetite as well as evolving regulatory standards. This is delivered through a combination of policy formation, governance, analysis, stress testing and limit setting and monitoring, and is part of the wider Risk Management Framework. The Funding and Liquidity Risk Policy serves as a key policy document within the ILAAP Framework.
		The management of Liquidity and Funding Risk ensures that the Group has robust strategies, policies, processes and systems for the identification, measurement, management and monitoring of liquidity risk, ensure that all significant and emerging risks to the Groups liquidity position are identified and appropriately managed as part of the MRA process and maintains sufficient and sustainable financial resources to ensure the Group can meet its commitments as they fall due.
		The Funding and Liquidity Risk Policy outlines the Group's requirement for a diversified funding profile. This is facilitated through a range of funding concentration limits by which the associated concentration risk is identified and managed. Compliance with these limits is assessed on a forward looking basis as part of the Group's Funding and Liquidity Plan and under a range of adverse scenarios.

(b)	Structure and organisation of the liquidity risk management function (authority, statute, other arrangements).	• The risk management structure in the Group includes defined lines of authority and accountability, effective processes to identify, manage, monitor and report the risks to which the Group is or might be exposed to. Clear responsibilities for the management of risk are defined across the Group through a three lines of defence model which ensures effective independent oversight and assurance in respect of key decisions.
		Under the three lines of defence model, the primary responsibility for risk management lies with the business management who are the first line of defence. The Risk function provides the second line of defence, providing independent oversight, support and challenge to business line managers. The third line of defence is the GIA function which provides independent assurance to the Board Audit Committee on the effectiveness of the system of internal control.
		The Group's RMF sets out how risk is managed in the Group, it provide the foundations and organisational arrangement for risk management practices, and articulates the integrated approach to risk management within the Group including its licenced subsidiaries. The RMF ensures that all classes of risk are managed in a single consistent and cohesive manner. The Risk Management Framework supports the Group in achieving its strategic ambitions by providing a clear, concise and comprehensive approach to the governance, implementation and embedding of risk management practices. This, in turn, will enable the Group across the Three Lines of Defence ('3LOD'), to have a common understanding of the Group's approach to each stage of the Risk Management life cycle (risk identification, assessment, management, measurement, monitoring, escalation and reporting).
		The objective of liquidity management is to ensure that, at all times, the Group holds sufficient funds to meet its contracted and contingent commitments to customers and counterparties at an economic price. The ILAAP framework and supporting Funding and Liquidity risk policy set out the key requirements for managing the risk. These include:  adherence to both internal limits and regulatory defined liquidity ratios including the Liquidity Coverage Ratio ('LCR') and the Net Stable Funding Ratio ('NSFR'). The LCR is designed to promote short term resilience of the Group's liquidity risk profile by ensuring that it has sufficient high quality liquid resources to survive an acute stress scenario lasting for 30 days. The NSFR has a time horizon of one year and has been developed to promote a sustainable maturity structure of assets and liabilities;  performing a multi-year projection of the Group's funding sources taking into account its baseline scenario, strategy and operational plans as outlined in the Group's Funding and Liquidity Plan. The purpose of this Plan is to set out a comprehensive, forward looking liquidity and funding strategy for the Group including material subsidiary companies;  assessing the funding plan under a range of adverse scenarios, the outcomes of which should ensure sufficient liquidity to implement a sustainable strategy even in a stressed environment;  maintaining a Contingency Funding Plan that identifies and quantifies actions that are available to the Group in deteriorating liquidity conditions and emerge from a temporary liquidity crisis as a credit worthy institution;  monitoring a further set of triggers and liquidity options outlined in the Group's Recovery Plan, which presents the actions available to the Group to restore viability in the event of extreme stress; and  having an approved liquidity cost-benefit allocation mechanism in place to attribute funding costs, benefits and risks to the Group's business lines.
(c)	A description of the degree of centralisation of liquidity management and interaction between the group's units	The Central Bank of Ireland has granted a derogation to the application of liquidity requirements on an individual basis under Article 8 of the CRR for AlB Mortgage Bank u.c. and EBS d.a.c Through a Liquidity Management Agreement the respective Boards of these subsidiaries have appointed Allied Irish Banks p.l.c. as their Liquidity Manager ('LM'). The agreement provides for the free movement of funds between the entities to enable them to meet their individual and joint obligations as they come due. The LM will oversee at all times the consolidated liquidity position of these subsidiaries and the individual liquidity position of each party in order to ensure that the subsidiary has sufficient liquidity.  AlB Group (UK) p.l.c. is a subsidiary regulated by the Prudential Regulation Authority (PRA) and manages liquidity and funding requirements in accordance with UK/EU regulatory requirements and its
(-1)		business objectives.
(d)	Scope and nature of liquidity risk reporting and measurement systems.	The Group liquidity and funding position is reported regularly to the Finance and Risk functions, Group ALCo, GRC and BRC. In addition, the ExCo and the Board are briefed on liquidity and funding on an ongoing basis.
		On an annual basis, the Board attests to the Group's liquidity adequacy via the liquidity adequacy statement as part of ILAAP. The Group's ILAAP encompasses all aspects of liquidity and funding management, including planning, analysis, stress testing, control, governance, policy and contingency planning. This document is submitted to the Joint Supervisory Team and forms the basis of their supervisory review and evaluation process.
		The information systems used by the Group provides timely and relevant liquidity information that is in line with the nature and complexity of the Group's business. This information monitors compliance with policies, procedures and limits, facilitate monitoring of individual foreign currency exposures and accommodate the performance of appropriate stress testing and scenario analysis.

(e)	Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants.	<ul> <li>The Funding and Liquidity Risk Policy serves as a key policy document within the ILAAP Framework. The objective of liquidity management is to ensure that at all times the Group holds sufficient funds to meet its contracted and contingent commitments to customers and counterparties at an economic price.</li> <li>This policy details the roles and responsibilities within the Group with regard to the identification, assessment, management, reporting, control and oversight of liquidity and funding risk. This policy is aligned with the Group RAS and all appropriate qualitative statements and metrics, as outlined within the Group RAS, are reflected either directly within this policy and / or supporting guidelines and procedures.</li> </ul>
(f)	An outline of the bank's contingency funding plans.	<ul> <li>The Group Contingency Funding Plan ('CFP') is designed to ensure that the Group can manage its business in deteriorating liquidity conditions and emerge from a temporary liquidity crisis as a creditworthy institution. A key objective of the CFP is to ensure the Group has the capacity to meet all of its liquidity requirements as set out in the RAS in a stressed environment.</li> <li>The CFP sets out the operational framework under which the liquidity of the Group will be managed in the event of an adverse operating environment as a result of company specific or systemic events. The Plan is designed to:         <ul> <li>enable the Group to maintain its core business in deteriorating liquidity conditions by ensuring that sufficient liquid financial resources are available to meet liabilities as they fall due;</li> <li>ensure clarity of management action in a crisis situation by having clearly defined roles and responsibilities, management information, infrastructure, and communication strategy;</li> <li>ensure clarity on co-ordination between AIB and the regulatory authorities;</li> <li>provide a holistic approach to liquidity management encompassing a broad range of metrics and measurements across the business that will enable a swift response to early warning signs; and</li> <li>incorporate the key regulatory guidelines as set out by the European Banking Authority ('EBA').</li> </ul> </li> <li>A further set of triggers and liquidity options are set out in the Group's Recovery Plan, which presents</li> </ul>
(g)	An explanation of how stress testing is used.	the actions available to the Group to restore viability in the event of extreme stress.  • Liquidity stress testing is a key component of the ILAAP framework. The Group undertakes liquidity stress testing that includes both firm specific and systemic risk events and a combination of both as a key liquidity control.  • Stressed assumptions are applied to the Group's liquidity buffer and liquidity risk drivers. This estimates the potential impact of a range of stress scenarios on the Group's liquidity position including its available liquid assets. Actions and strategies available to mitigate the impacts of the stress scenarios are evaluated as to their appropriateness. The purpose of these tests is to ensure the continued stability of the Group's liquidity position within the Group's pre-defined liquidity risk tolerance levels.  • Liquidity stress test results are reported to the ALCo, Executive Committee and Board. The Group also monitors a suite of Recovery Plan Triggers and Early Warning Indicators in order to identify the potential emergence of a liquidity stress. As part of its contingency and recovery planning, the Group has identified a suite of potential liquidity and funding options which could be exercised to help the Group to restore its liquidity position on the occurrence of a major stress event.
(h)	A declaration approved by the management body on the adequacy of liquidity risk management arrangements of the institution providing assurance that the liquidity risk management systems put in place are adequate with regard to the institution's profile and strategy.	On an annual basis, the Board attests to the Group's liquidity adequacy via the Liquidity Adequacy Statement.

(i) 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 shall include key ratios and figures (other than those already covered in the EU LIQ1 template under this ITS ) providing external stakeholders with a comprehensive view of the institution's management of liquidity risk, including how the liquidity risk profile of the institution interacts with the risk tolerance set by the management body.

These ratios may include:

- Concentration limits on collateral pools and sources of funding (both products and counterparties)
- Customised measurement tools or metrics that assess the structure of the bank's balance sheet or that project cash flows and future liquidity positions taking into account off-balance sheet risks which are specific to that bank
- Liquidity exposures and funding needs at the level of individual legal entities, foreign branches and subsidiaries, taking into account legal, regulatory and operational limitations on the transferability of liquidity
- Balance sheet and off-balance sheet items broken down into maturity buckets and the resultant liquidity gaps

- The objective of liquidity management is to ensure that, at all times, the Group holds sufficient funds to
  meet its contracted and contingent commitments to customers and counterparties at an economic
  price. Liquidity and Funding risk is identified and assessed using a range of liquidity stress testing
  scenarios and ensuring adherence to limits based on both internal limits and the regulatory defined
  liquidity ratios, the LCR and the NSFR.
- As outlined in part (a), the MRA process identifies the key material risks to the Group which in turn
  informs the Group's appetite for, and tolerance of risk in the Group RAS process. The Group's risk profile
  is measured against the risk appetite and adherence to the Group RAS is reported to the Board on a
  monthly basis.
- The qualitative articulation of the Group's tolerance to liquidity and funding risk is for the Group's funding strategy to deliver a sustainable, diversified and robust customer deposit base at economic pricing and to further enhance and strengthen the wholesale funding franchise with appropriate access to term markets to support core lending activities. The strategy aims to deliver a solid funding structure that complies with internal and regulatory policy requirements and reduces the probability of a liquidity stress, i.e. an inability to meet funding obligations as they fall due.
- The quantitative articulation of the Group's tolerance to liquidity and funding risk consists of a series of RAS metrics for the material risks identified as per the Group MRA process. This includes but is not limited to a series of concentration metrics on the Group's sources of funding. This is complemented with a metric that determines the survival period (in months) for which the Group has sufficient liquidity to survive a pre-determined stressed scenario.
- The Group manages the liquidity pool on a centralised basis and is primarily comprised of government guaranteed bonds, balances with central banks and internal and external covered bonds. The composition of the liquidity pool is subject to limits recommended by the Risk function and approved by the Board. At 31 December 2024, the Group held € 69,063 m (2023: € 67,776 m) in qualifying liquid assets ('QLA') of which € 7,599 m (2023: € 6,903 m) was not available due to repurchase, secured loans and other restrictions. The Group's available QLA was € 61,464 m (2023: € 60,873 m).

# 25: Template EU LIQ1 - Quantitative information of LCR

As per Article 451a(2), the template below sets out the liquidity coverage ratio detail of AIB Group.

Scope of consolidation: consolidated

		а	b	С	d	e	f	~	h
							f g al weighted value (averag		
EU 1a	Quarter ending on (DD/MM/YYYY)	31/12/2024	Total unweighted value (average) 31/12/2024 30/09/2024 30/06/2024 31/03/2024						
	Number of data points used in the calculation of averages	12	12	12	12	12 12		12	12
HIGH-QI	JALITY LIQUID ASSETS								
_					_				
1	Total high-quality liquid assets (HQLA)					42,824	42,329	41,203	40,721
CASH - C	DUTFLOWS								
2	Retail deposits and deposits from small business customers, of which:	75,007	74,103	73,437	72,872	6,192	6,190	6,250	6,337
3	Stable deposits	39,521	39,525	39,685	39,821	1,976	1,976	1,984	1,991
4	Less stable deposits	29,901	29,941	30,283	30,701	4,165	4,167	4,215	4,273
5	Unsecured wholesale funding	29,758	29,678	29,813	30,037	13,440	13,352	13,357	13,479
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks								
7	Non-operational deposits (all counterparties)	29,449	29,476	29,687	29,945	13,131	13,149	13,230	13,388
8	Unsecured debt	309	203	127	92	309	203	127	92
9	Secured wholesale funding					29	30	24	20
10	Additional requirements	12,446	12,350	12,279	12,121	1,831	1,784	1,709	1,614
11	Outflows related to derivative exposures and other collateral requirements	799	756	675	588	799	756	675	588
12	Outflows related to loss of funding on debt products	_	_	_	-	_	-	-	-
13	Credit and liquidity facilities	11,647	11,593	11,603	11,533	1,032	1,027	1,034	1,026
14	Other contractual funding obligations	887	863	550	735	511	522	275	505
15	Other contingent funding obligations	5,535	5,486	5,434	5,337	568	564	558	547
16	TOTAL CASH OUTFLOWS		>			22,571	22,441	22,173	22,502
CASH - II	NFLOWS								
17	Secured lending (e.g. reverse repos)	375	448	381	339	309	328	268	243
18	Inflows from fully performing exposures	870	872	831	801	625	627	592	569
19	Other cash inflows	741	721	718	708	230	210	211	210
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	1,987	2,041	1,930	1,849	1,164	1,165	1,072	1,022
EU 20a	Fully exempt inflows								
EU 20b	Inflows Subject to 90% Cap								
EU 20c	Inflows subject to 75% cap	1,803	1,858	1,765	1,706	1,164	1,165	1,072	1,022
TOTAL A	DJUSTED VALUE								
EU-21	LIQUIDITY BUFFER			_		42,824	42,329	41,203	40,721
22	TOTAL NET CASH OUTFLOWS					21,407	21,276	21,102	21,480
23	LIQUIDITY COVERAGE RATIO			-		200.27%	199.18 %	195.29 %	190.03 %

# 26: Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1

As per Article 451a(2), the below table provides qualitative information on the LCR ratio.

		Qualitative information
		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 LCR aims to ensure that a bank has an adequate stock of unencumbered High Quality Liquid Assets 'HQLA' to meet its liquidity needs for a 30-calendar day liquidity stress scenario. The LCR remained above the regulatory minimum requirements of 100% and internal risk appetite limits over the review period. The Group maintains a strong liquidity position by keeping a stable balance sheet structure that is supported by a diversified funding base. The LCR remains strong due to sustained levels of customer deposits. Customer deposits increased by $\in$ 1.9 bn over the quarter (Retail deposits increased by $\in$ 1.1 bn and corporate deposits increased by $\in$ 0.8 bn), they are in excess of $\in$ 109 bn. AlB began issuing commercial paper in January 2024, in EUR, GBP & USD in 1-3 month maturities in order to bolster liquidity resilience. This has been recently modified to include maturities out to 8 months. All amounts are averages of the preceding 12 months for each quarter of the relevant disclosure period.
(b)	Explanations on the changes in the LCR over time	The Group LCR for 31 December 2024 is 201.05%. The average LCR for the 12 months to 31 December 2024 increased 1.09% to 200.27% for the period under review. The increase in 12 month average for High Quality Liquid Assets is primarily due to an increase in level 1 Central government assets, Regional government assets and Multilateral development bank assets in October to December 2024 compared with October to December 2023. Outflows also increased primarily due to an increase in our Unsecured debt, driven by the maturities of some commercial paper in October to December 2024.
(c)	Explanations on the actual concentration of funding sources	The composition of the Group's funding results in a low LCR outflow relative to the overall size of the funding base, as a large proportion of this deposit base comes from Retail customers, which in aggregate provide a stable source of funding. Funding concentration by counterparty, currency and tenor is monitored on an ongoing basis and where concentrations do exist, these are managed as part of the planning process and limited by the internal liquidity and funding risk monitoring framework, with analysis regularly provided to senior management.
(d)	High-level description of the composition of the institution's liquidity buffer.	The buffer is primarily composed of Level 1 assets. Notably, reserves at central banks represents the substantial majority of the buffer at the reporting date. Diversification in the buffer is achieved through investments in Level 1 debt instruments such as government guaranteed bonds, and Level 2 debt instruments such as high quality external covered bonds.
(e)	Derivative exposures and potential collateral calls	The Group actively manages its over-the-counter 'OTC' derivative exposures arising from activity generated by corporate customers while the remainder represent hedging and trading decisions of the Group's derivative and foreign exchange traders with a view to generating incremental income. These derivative financial instruments include interest rate, foreign exchange, equity and credit derivatives. The LCR captures both contractual derivative outflows and the impact of an adverse market scenario on derivative outflows and collateral calls. In addition, derivative outflows are captured in the Group's liquidity stress testing.
(f)	Currency mismatch in the LCR	As part of its funding strategy, the Group makes use of the swap markets to support its funding needs across currencies. Matching its deposit currency mix, the main portion of the Group's liquid assets is denominated in EUR and the local currencies of key operating locations (GBP and USD). The Group's stable funding base of customer deposits is predominantly denominated in the local currency of its key operating locations.
(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	For LCR purposes, assets outside the Liquidity function's control can qualify as HQLAs in so far as they match outflows in the same jurisdiction. For the Group, this means that AIB Group (UK) p.l.c. HQLAs (cash held with the Bank of England) can qualify up to the amount of 30 days UK outflows under LCR.

## 27: Template EU LIQ2 - Net Stable Funding Ratio

As per Article 451a(3) the template below sets out the NSFR ratio detail of AlB Group. The December 2024 NSFR decreased by 1.50% to 161.81% from June 2024. Available Stable Funding ('ASF') increased mainly due to retail deposits up € 1.4 bn. ASF from own funds increased due to Common Equity Tier 1 up € 0.5 bn and Additional Tier 1 decreased € 0.3 bn due to moving into < 6 months bucket. Required Stable Funding increased mainly due to the performing residential mortgages up € 1.3 bn.

AIB Group does not treat any assets or liabilities as being interdependent.

		а	b	С	d	e
	,			e by residual matur		
	(in currency amount)	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available	e stable funding (ASF) Items	140 matarity	v o monens	o months to vigi	= 171	
1	Capital items and instruments	12,653	624	0	1,662	14,315
2	Own funds	12,653	624		1,662	14,315
3	Other capital instruments	==,555	_	_		
4	Retail deposits		71,502	2,586	2,683	71,429
5	Stable deposits		40,171	1,146	1,245	40,497
6	Less stable deposits		31,331	1,440	1,438	30,931
7	Wholesale funding:		32,868	2,601	6,595	22,144
8	Operational deposits		-	_	_	_
9	Other wholesale funding		32,868	2,601	6,595	22,144
10	Interdependent liabilities		_	_	_	_
11	Other liabilities:	203	2,482	_	257	257
12	NSFR derivative liabilities	203				
13	All other liabilities and capital instruments not included in the above categories		2,482	_	257	257
14	Total available stable funding (ASF)					108,145
Required	stable funding (RSF) Items					
15	Total high-quality liquid assets (HQLA)					3,117
EU-15a	Assets encumbered for more than 12m in cover pool		2	2	28	27
16	Deposits held at other financial institutions for operational purposes		_	-	_	_
17	Performing loans and securities:		6,771	6,425	66,492	55,669
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		_	_	5	5
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		2,811	2,227	2,619	3,895
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		2,751	2,985	23,974	23,143
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		91	89	515	425
22	Performing residential mortgages, of which:		1,113	1,058	35,093	24,377
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		816	846	32,690	22,080
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on- balance sheet products		96	155	4,801	4,248
25	Interdependent assets					
26	Other assets:	_	5,139	_	6,471	6,903
27	Physical traded commodities				_	
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs				405	345
29	NSFR derivative assets				_	_
30	NSFR derivative liabilities before deduction of variation margin posted				1,760	88
31	All other assets not included in the above categories		2,973	_	6,471	6,471
32	Off-balance sheet items		81	_	17,716	1,121
33	Total RSF					66,836
34	Net Stable Funding Ratio (%)					161.81 %

Chapter 8. Disclosure of exposures to credit risk, dilution risk and credit quality

# 28: Table EU CRA - General qualitative information about credit risk

As per Article 435(1), points (a), (b), (d) and (f) the table below provides a description of AIB risk management objectives and policies for credit risk by providing the following information:

Legal basis	Row number		Qualitative information
Point (f) of Article 435(1) CRR	(a)	risk	One of the Group's main sources of income arises from granting credit. Accordingly, this exposes it to its most significant risk, namely credit risk. The most significant credit risk in AIB Group arises from traditional lending activities to corporate, commercial and personal customers and to sovereigns and banks. Credit risk also arises through the use of derivatives, off-balance sheet guarantees and commitments and through the Group's investment securities.  The Group Credit Risk Framework is the overarching Board approved document which sets out the principles of how the Group identifies, assesses, approves, monitors and reports credit risk to ensure that robust credit risk management is in place. This document contains the minimum standards and principles that are applied across the Group to provide a common, robust and consistent approach to the management of credit risk. The Group Credit Risk Framework is supported by a suite of credit policies, standards and guidelines which define in greater detail the minimum standards and credit risk metrics to be applied for specific products, business lines, and market segments.
			Internal credit ratings One of the objectives of credit risk management is to accurately quantify the level of credit risk to which the Group is exposed through the initial credit approval and ongoing review process. All relevant exposures are assigned to a rating model and within that to an internal risk grade (rating). A grade is assigned on the basis of rating criteria within each rating model from which estimates of probability of default ('PD') are derived.
			Internal credit grades are fundamental in assessing the credit quality of loan exposures, and for assessing capital requirements for portfolios where prior regulatory approval has been received. Internal credit grades are key to management reporting, credit portfolio analysis, credit quality monitoring and in determining the level and nature of management attention applied to exposures. Changes in the objective information are reflected in the credit grade of the borrower/ loan with the resultant grade influencing the management of individual loans. In line with the Group's credit management lifecycle, heightened credit management and special attention is paid to lower quality performing loans or 'criticised' loans and non-performing/defaulted loans, which are defined below.
			Using internal models, the Group utilises a credit grading masterscale that gives it the ability to categorise credit risk across different rating models and portfolios in a consistent manner. The masterscale consolidates complex credit information into a single attribute, aligning the output from the risk models with the Group's Forbearance and Definition of Default and Credit Impairment policies. The masterscale grades are driven by grading model appropriate through the cycle PDs combined with other asset quality indicators such as default, forbearance and arrears in order to provide the Group with a mechanism for ranking and comparing credit risk associated with a range of customers. Masterscale categorises loans into a broad range of grades which can be summarised into the following categories: strong/satisfactory grades; criticised grades; and non-performing/default loans.
			The IFRS 9 PD modelling approach uses a combination of rating grades and scores obtained from these credit risk models along with key factors such as the current/recent arrears status or the current/recent forbearance status and macroeconomic factors to obtain the relevant IFRS 9 12 month and Lifetime PDs (i.e. point in time).
			Strong/satisfactory Accounts are considered strong/satisfactory if they have no current or recent credit distress and the probability of default is typically less than 6.95%, they are not in arrears and there are no indications that they are unlikely to repay.  Strong (typically with a PD less than 0.99%): Strong credit with no weakness evident.  Satisfactory (typically with a PD greater than or equal to 0.99% and less than 6.95%): Satisfactory credit with no weakness evident.
			Criticised Accounts of lower credit quality and considered as less than satisfactory are referred to as criticised and include the following: Criticised watch: The credit is exhibiting weakness in terms of credit quality and may need additional management attention; the credit may or may not be in arrears. Criticised recovery: Includes forborne cases that are classified as performing including those which have transitioned from non-performing forborne, but still require additional management attention to monitor for re-default and continuing improvement in terms of credit quality.

Non-performing/Default The Group's definition of default is aligned with the EBA 'Guidelines on the application of the definition of default' under Article 178 of the Capital Requirements Regulation and ECB Banking Supervision Guidance to Banks on non-performing loans. The Group has aligned the definitions of 'non-performing', 'classification of default' and IFRS 9 Stage 3 'credit impaired', with the exception of loans measured at fair value through profit and loss, and those loans which have been derecognised and newly originated in Stage 1 or POCI (purchased or originated credit impaired) which are no longer classified as credit impaired but continue to be classified as non-performing and in default. This alignment ensures consistency with the Group's internal credit risk management and assessment practices.
Loans are identified as non-performing or defaulted by a number of characteristics. The key criteria resulting in a classification of non-performing are:  — Where the Group considers a borrower to be unlikely to pay their loans in full without realisation of collateral, regardless of the existence of any past-due amount; or  — The borrower is 90 days or more past due on any material loan. Day count starts when any material amount of principal, interest or fee has not been paid by a borrower on the due date.
The criteria for the definition of financial distress and forbearance are included in the Group's Forbearance Policy. Criteria for the identification of non-performing exposures and unlikeliness to pay are included in the Group's Definition of Default and Credit Impairment Policy.
Credit risk management consideration of Environmental, Social, and Governance ('ESG') risks The Group continues to adapt its credit risk management processes and policies to monitor ESG risks. Sector specific rules and limitations are incorporated into credit policies within a defined climate-related and environmental risk appetite. The ESG Questionnaire continues to be used in credit applications for borrowers identified as carrying increased transitional, environmental, social and/or governance related risk where the new lending is over €/£ 1 million.
The impact of climate change on the management, escalation and reporting of credit risk was considered by the Group. There is currently no reasonable and supportable information that indicates a material impact of climate change on ECLs at a macro level, and the Group's approach

considered by the Group. There is currently no reasonable and supportable information that indicates a material impact of climate change on ECLs at a macro level, and the Group's approach to individual counterparty risk assessment adequately captures climate risk where appropriate. The impact of climate risk under various climate scenarios is assessed as part of the stress testing process within the Group. Developments will continue to be monitored in 2025 and on an onward basis to ensure ECLs appropriately reflect latent risk from potentially emerging climate risks.

Point
(a) and
(d) of
Article
435(1)
CRR

(b)

When discussing their strategies and processes to manage credit risk and the policies for hedging and mitigating that risk in accordance with points (a) and (d) of Article 435(1) CRR, the criteria and approach used for defining the credit risk management policy and for setting credit risk limits.

Credit risk is the risk that the Group will incur losses as a result of a customer or counterparty being unable or unwilling to meet their contractual obligations and associated bank credit exposure in respect of loans or other financial transactions.

Based on the annual risk identification and materiality assessment process, credit risk is grouped into the following three sub categories:

- Credit default risk: The risk of losses arising as a result of the borrower, issuer, or derivative
  counterparty not meeting their contractual obligations in full and on time and the resulting
  credit default risk/risk of loss leading to a risk to capital including residual risk (which is the
  risk that credit risk mitigation techniques used by the Group prove less effective than
  expected);
- II. Concentration risk: The risk of excessive credit concentration including to an individual, counterparty, group of connected counterparties, industry sector, a geographic region, country, a type of collateral or a type of credit facility; and
- III. Country risk: The risk of having exposure to a country, arising from possible changes in the business environment that may adversely affect operating profits or the value of assets related to the country.

Credit risk exposure derives from standard on-balance sheet products such as mortgages, loans, overdrafts and credit cards. However, credit risk also arises from other products and activities including, but not limited to: "off-balance sheet" guarantees and commitments; securities financing; investment securities; asset backed securities and partial failure of a trade in a settlement or payment system.

#### **Group Risk Appetite Statement**

The Group's Risk Appetite Statement ('RAS') defines the aggregate level and types of risks that the Group is willing to take, accept, or tolerate in pursuit of its business objectives and strategy as set by the Board. As part of the overall framework for risk governance, it forms a boundary condition to strategy and guides the Group in its risk-taking and related business activities. Credit risk appetite is set at Board level and is described, reported and monitored through a suite of qualitative and quantitative metrics. The credit risk metrics cover the three sub risks identified as part of the AIB Group material risk assessment process – counterparty risk, concentration risk and country risk, and include concentration limits on quantum of new lending, balance sheet exposure and credit quality. Risk appetite is stress tested to ensure that limits are within the risk-taking capacity of the Group. The Group's risk appetite for credit risk is reviewed and approved at least annually.

#### **Group Credit Risk Framework**

The Group implements and operates policies to govern the identification, assessment, approval, monitoring and reporting of credit risk. The Group Credit Risk Framework is the overarching Board approved documents which set out the principles of how the Group identifies, assesses, approves, monitors and reports credit risk to ensure that robust credit risk management is in place. This document contains the minimum standards and principles that are applied across the Group to provide a common, robust and consistent approach to the management of credit risk.

The Group Credit Risk Framework is supported by a suite of credit policies, standards and guidelines which define in greater detail the minimum standards and credit risk metrics to be applied for specific products, business lines, and market segments.

Credit Risk, as an independent risk management function, monitors key credit risk metrics and trends, including policy exceptions and breaches, reviews the overall quality of the loan book, challenges variances to planned outcomes and tracks portfolio performance against agreed credit risk indicators. This allows the Group, if required, to take early and proactive mitigating actions for any potential areas of concern.

#### Credit approval overview

The Group operates credit approval criteria which:

- Include a clear indication of the Group's target market(s), in line with Group and segment risk appetite statements;
- Require a thorough understanding and assessment of the borrower or counterparty, as well as the purpose and structure of credit, and the source of repayment; and
- Enforce compliance with minimum credit assessment and facility structuring standards.

Credit risk approval is undertaken by professionals operating within a defined delegated authority framework. However, for certain selected retail portfolios, scorecards and automated strategies (together referred to as 'score enabled decisions') are deployed to automate and to support credit decisions and credit management (e.g. score enabled auto-renewal of overdrafts).

The Board is the ultimate credit approval authority in the Group. The Board has delegated credit authority to various credit committees and to the Chief Credit Officer ('CCO'). The CCO is permitted to further delegate this credit authority to individuals within the Group on a risk appropriate basis. Credit limits are approved in accordance with the Group's risk policies and guidelines.

All exposures above certain levels require approval by the Group Credit Committee ('GCC') and/or Board. Other exposures are approved according to a structure of tiered individual authorities which reflect credit competence, proven judgement and experience. Depending on the borrower/ connection, grade or weighted average facility grade and the level of exposure, limits are sanctioned by the relevant credit authority. Material lending proposals are referred to credit units for independent assessment/approval or formulation of a recommendation and subsequent adjudication by the applicable approval authority.

### Credit risk organisation and structure

The Group's credit risk management structure operates through a hierarchy of lending authorities. All customer loan requests are subject to a credit assessment process. The role of the Credit Risk function is to provide direction, independent oversight of and challenge to credit risk-taking.

## Credit risk mitigants

The perceived strength of a borrower's repayment capacity is the primary factor in granting a loan. However, the Group uses various approaches to help mitigate risks relating to individual credits, including transaction structure, collateral and guarantees. The main types of collateral for loans and advances to customers are described under the section on collateral. Credit policy and credit management standards are controlled and set centrally by the credit risk function.

Occasionally, credit derivatives are purchased to hedge credit risk. Current levels are modest and their use is subject to the normal credit approval process.

The Group enters into netting agreements for derivatives with certain counterparties, to ensure that in the event of default, all amounts outstanding with those counterparties will be settled on a net basis. Depending on the size of the potential exposure derivative transactions with wholesale counterparties are typically collateralised under a Credit Support Annex in conjunction with the International Swaps and Derivatives Association ('ISDA') Master Agreement.

The Group also has in place an Interbank Exposure Policy which establishes the maximum exposure for each counterparty bank, depending on credit grade rating. Each bank is assessed for the appropriate maximum exposure limit in line with the policy. Risk generating business units in each segment are required to have an approved bank and country limit prior to granting any credit facility, or approving any credit obligation or commitment which has the potential to create interbank or country exposure.

#### Collatera

Credit risk mitigation may include a requirement to obtain collateral as set out in the Group's lending policies. Where collateral and/or guarantees are required, they are usually taken as a secondary source of repayment in the event of a borrower's default. Guarantors typically include corporates, individuals, financial institutions and sovereigns. Their creditworthiness is assessed on an individual case- by-case basis. The Group maintains policies which detail the acceptability of specific classes of collateral.

The principal collateral types for loans and advances are:

- Charges over business assets such as premises, inventory and accounts receivable;
- Charges over other movable collateral assets such as plant & machinery, marine vessels etc:
- Mortgage/legal charge over residential and commercial real estate; and
- Charges over financial instruments such as debt securities and equities.

The nature and level of collateral required depends on a number of factors such as the type of the credit facility, the term of the credit facility and the amount of exposure. Collateral held as security for financial assets, other than for loans and advances, is determined by the nature of the instrument. Debt securities and treasury products are generally unsecured, with the exception of asset backed securities, which are secured by a portfolio of financial assets.

Collateral is not usually held against loans and advances to banks, including central banks, except where securities are held as part of reverse repurchase or securities borrowing transactions or where a collateral agreement has been entered into under a master netting agreement or where the bank purchases covered bonds as part of its liquidity portfolio.

For non-mortgage/non-property lending, where collateral is taken, it will typically include a charge over the business assets such as inventory and accounts receivable. In some cases, a charge over property collateral or a personal guarantee supported by a lien over personal assets may also be taken. Where cash flows arising from the realisation of collateral held are included in the expected credit loss assessments, in many cases management rely on valuations or business appraisals from independent external professionals.

Credit risk mitigation for regulatory capital requirements calculation For non-retail foundation IRB exposures, supervisory LGDs are used for minimum regulatory capital requirement calculation purposes as is required under the CRR. These LGDs are either applied directly to obligors, or are reduced through the recognition of the risk-mitigating impact of qualifying collateral held. For the Retail mortgage IRB exposures, the LGD model incorporates collateral so there is no separate credit risk mitigation.

For counterparty credit risk, the Group uses eligible financial collateral for derivatives and securities financing transactions.

Methodologies for valuing immovable property collateral

Details on the valuation rule methodologies applied and processes used to assess the value of immovable property assets taken as collateral are described in the Group Property Valuation Policy and Property Valuation Guidance. Both documents are subject to an annual review.

As property loans, including residential mortgages, represent a significant concentration within the Group's loans and advances to customer's portfolio, some key principles have been applied in respect of the valuation of property collateral held by the Group.

The value of immovable property collateral is assessed at loan origination and at certain stages throughout the credit lifecycle in accordance with the Group Property Valuation Policy e.g. at annual review where required.

In accordance with the Group Property Valuation Policy and Property Valuation Guidelines, the Group employs a number of methods to assist in reaching appropriate valuations for property

- a. External valuation firms on the Group's Valuers Panel, are engaged by the Group to undertake valuations of immovable property collateral in accordance with the rules set out in the Group Property Valuation Policy.
  Independent professional internal valuations are completed in limited circumstances (e.g.
- agricultural land) using a desktop valuation approach by professional qualified internal valuers who are independent of the credit process in the second line of defence. The assets being valued by this means must have an independent professional external
- valuation completed within the past 3 years.
  Internal valuations are completed by first line of defence Case Managers pursuant to the rules in the Property Valuation Policy and in line with the Property Valuation Guidance, which provides appropriate valuation methodology guidance. These include the following valuation methodologies;

  - Index valuation approach used for residential property;
    Comparable valuation approach a basic level of valuation methodology used to value agricultural land or as a sense check for the valuation of residential, commercial or development land;
  - iii. Commercial investment valuation approach used for the valuation of commercial property using the Groups commercial investment yield matrices;
  - Residual valuation approach used for the valuation of development land or land with development potential; and
  - Profits valuation approach used for the valuation of trading assets e.g., hotels, licensed premises, convenience stores etc. using the Groups stabilized earnings before interest, taxes, depreciation and amortization (EBITDA) matrices.

Methodologies for valuing movable property collateral

Details on the valuation rule methodologies applied and processes used to assess the value of movable property assets such as plant and machinery, marine vessels etc. taken as collateral are described in the Group Property Valuation Policy and Movable Property Valuation Guidance & Operational Procedures and are both reviewed annually.

The value of movable property collateral is assessed at loan origination and at certain stages throughout the credit life cycle in accordance with the Group Property Valuation Policy e.g. at annual review where required.

In accordance with the Group Property Valuation Policy and Movable Property Valuation Guidance & Operational Procedures, the Group employs a number of methods to assist in reaching appropriate valuations for movable property collateral held:

- External Valuation firms are engaged by the Group to undertake valuations of movable collateral and for marine vessel assets the firms must be on the Group's Valuers Panel, and in accordance with the rules set out in the Group Property Valuation Policy.
- Internal valuations are completed by first line of defence Case Managers pursuant to the rules in the Property Valuation Policy and in line with the Movable Property Valuation Guidance & Operational Procedures, which provides appropriate valuation methodology guidance for the different movable collateral types of moveable collateral.

Point (b) of Article 435(1) CRR	(c)	When informing on the structure and organisation of the risk management function in accordance with point (b) of Article 435(1) CRR, the structure and organisation of the credit risk management and control function.

The Group operates a 3LOD model where each line plays a distinct role in the Group's wider risk governance, management, oversight, and assurance responsibilities. The 3LOD model applies to the identification, assessment, measurement, management, monitoring, and reporting of credit risk. The roles and responsibilities supporting the effective management of credit risk across the 3LOD are outlined below.

The First Line of Defence ('1LOD') business units have primary responsibility for the identification, assessment, measurement, management, monitoring and reporting of credit risk. First line of defence responsibilities include the following:

- Embedding credit risk culture through transparent communication and understanding of the root cause of issues.
- Ensuring Credit Exposure is assessed and managed, in line with relevant credit policies and procedures.
- Approving Credit Exposure in line with policy and relevant Credit Approval Authorities documents
- Ensuring accurate recording of Customer data, and credit inputs (including credit grades, Lender identified Unlikely To Pay ('UTP') requirements and Forbearance identifiers), that support appropriate staging and identification of Significant Increase in Credit Risk ('SICR') for all Credit Exposures.
- Reporting business performance, inclusive of credit risk metrics and limits/tolerances.
- Ensuring that any credit risk breaches (e.g. RAS metric) are appropriately identified and escalated, root cause and required action plans determined.
- Ensuring appropriate methodologies and practices to allow for the aggregation of credit risk exposures (e.g. business lines, products, sectors.
- Monitoring asset quality and overall credit portfolio performance, including early warning indicators, at a business unit level, and taking appropriate actions to ensure proactive credit risk management.
- Maintaining adequate Management Information (MI) systems to enable effective credit risk monitoring and reporting.
- Monitoring the value of Immovable and movable property collateral for cases that are subject to review.
- Having adequately designed control standards, operating procedures and first line control testing in place to demonstrate appropriate embedding of credit policies and to mitigate credit risk
- Implementing controls and procedures to ensure credit policy exceptions, credit standard deviations and breaches are appropriately identified, recorded, and escalated.
- Providing adequate training, as required, to enable staff to fulfil their credit risk
  management duties effectively, including ongoing training and embedding of credit
  policies, credit standards (where applicable) and supporting relevant business and credit
  guidance and procedures.

The Second Line of Defence ('2LOD') is an independent Risk function, under the direction of the CRO that monitors, controls and supports risk-taking activities across the Group, and provides advice and guidance in relation to risk, including independent oversight and reporting on the Group's risk profile. Credit Risk is a key function within Risk, led by the CCO, responsible for the undertaking of these 2LOD responsibilities with regards to the identification, assessment, measurement, management, monitoring and reporting of credit risk. The key responsibilities across the various Credit Risk teams are as follows:

#### Credit Policy

- Developing and maintaining, on behalf of the CCO, the Credit Risk Policy Architecture in line with the Group's Risk Appetite and regulatory requirements.
   Completing, in conjunction with Compliance, credit policy regulatory gap analyses and, as
- Completing, in conjunction with Compliance, credit policy regulatory gap analyses and, as required, providing guidance to the 1LOD on regulatory requirements underpinning credit policy.
- Ensuring credit policies are supported by appropriate Implementation & Communications
  Plans.
- Providing guidance and support to the CCO and CRO, and relevant Credit Risk/Risk governance fora, on credit risk policy matters.
- Providing sign-off, on behalf of the CCO, on new/revised credit products in line with the Group Product and Proposition Risk Policy.
- Providing advice and guidance, as required, to support the implementation of the Credit Risk Policy Architecture to include credit policy training materials.
- Providing a 2LOD review and challenge of 1LOD Related party and Top 30 exposure reporting.

#### Credit Units

- Ensuring credit decisions incorporate detailed credit assessment and robust 2LOD challenge, where required.
- Approving Credit Exposure under their delegated Credit Relevant Credit Authority ('RCA') discretion in line with the relevant Credit Approval & Review Authorities ROI / UK ('CARA').
- Ensuring independent review and dual approval of all Non-retail credit grades.
- Ensuring credit decisions are consistent with policy rules and credit standards (where applicable) through credit approval under their own delegated credit authority and participation in credit committee fora.
- Embedding credit policies, credit standards (where applicable) and relevant credit guidance and procedures within the relevant Credit Units.
- Providing advice and guidance, as required, to support the implementation of the Credit Risk Policy Architecture, the relevant CARA ROI / UK, and the automated credit strategies (where relevant).

### Credit Risk Portfolio Monitoring ('CRPM')

- Designing and setting credit risk metrics for the Group RAS, including overarching qualitative statements and quantitative credit risk limits, watch triggers and Key Risk Indicators ('KRIs').
- Performing oversight of the credit risk portfolio ensuring independent 'top down' portfolio monitoring.
- Reviewing, monitoring, and reporting on asset quality.
- Reviewing and challenging 1LOD MI and insights in respect of the credit risk portfolio, supported by independent review of data and key credit risk segment RAS metrics.
- Reviewing and challenging relevant Credit Risk inputs to the financial plan and Internal Capital Adequacy Assessment Process ('ICAAP').
- Review and challenge of the methodologies and practices to allow for the aggregation of credit risk exposures to support the identification of credit risk concentrations.
- Reviewing and challenging the automated credit strategies (where relevant).

## Credit Risk Expected Credit Loss ('ECL') Team:

- Reviewing and challenging the ECL outcomes on at least a bi-annual basis by submitting a 2LOD risk opinion to the Executive Committee, ECL Group Credit Committee, and to BAC where appropriate.
- Producing the qualitative Credit Risk inputs into the Group's Interim and Annual Financial Report, and Pillar 3 reporting and reviewing and challenging the 1LOD quantitative Credit Risk disclosure inputs.
- Reviewing and challenging the qualitative inputs included in the annual subsidiary disclosures.
- Submit semi-annual 2LOD review of subsidiary outcomes to the respective subsidiary boards and provide quarterly updates as part of the subsidiary CRO reporting process in conjunction with CRPM.

Group Valuations Oversight ('GVO') is a centralised 2LOD team in Risk Operations & Delivery, which includes qualified Chartered Surveyors and Royal Institution of Chartered Surveyors Registered Valuers, responsible for the independent oversight of Group Property collateral.

Second Line Assurance is comprised of Group Credit Review, Group Risk Assurance and Model Validation, reporting directly to the CRO.

Compliance: Compliance reports to the Group Chief Compliance Officer within Risk, and to the CRO.

Enterprise Risk is responsible for the management, reporting, control and oversight of model risk, including the validation of credit risk models.

			Third Line of Defence ('3LOD') Group Internal Audit's ('GIA') primary responsibility is to AIB Group's ('the Group') Board of Directors through the Board Audit Committee ('BAC'). GIA helps them to carry out their corporate governance responsibilities by providing an independent view on the key risks facing the Group, and the adequacy and effectiveness of governance, risk management and the internal control environment in managing these risks. All activities undertaken within, and on behalf of the Group, are within the scope of GIA. This includes the activities of subsidiaries and the risk and control functions (including Group Risk and Compliance functions) and 1LOD and 2LOD assurance activities established by the Group.GIA provide independent assurance on the management of credit risk and the control environment on a risk prioritised basis over a three-year cycle which can include:  - The assessment by the first line of defence of credit applications, - The role of the 2LOD in the review and challenge of the credit applications, - The credit management process through the credit lifecycle in 1LOD / 2LOD.
Point (b) of Article 435(1) CRR	(d)	When informing on the authority, status and other arrangements for the risk management function in accordance with point (b) of Article 435(1) CRR, the relationships between credit risk management, risk control, compliance and internal audit functions.	As outlined under section (c).

### 29: Table EU CRB - Additional disclosure related to the credit quality of assets

As per Article 442, points (a) and (b) the table below provides additional qualitative and quantitative information:

Legal basis	Row number		Qualitative information
Article 442 (a) and (b) CRR	a	The scope and definitions of 'past-due' and 'impaired' exposures used for accounting purposes and the differences, if any, between the definitions of past due and default for accounting and regulatory purposes as specified by the EBA Guidelines on the application of the definition of default in accordance with Article 178 CRR.	The Group's definition of default is aligned with the EBA 'Guidelines on the application of the definition of default' under Article 178 of Capital Requirements Regulation and ECB Banking Supervision Guidance to Banks on Non-performing loans.  The Group has aligned the definitions of 'non-performing', 'classification of default' and IFRS 9 Stage 3 'credit impaired', with the exception of loans measured at fair value through profit or loss, and those loans which have been derecognised and newly originated in Stage 1 or POCI (purchased or originated credit impaired) which are no longer classified as credit impaired but continue to be classified as non-performing and in default. This alignment ensures consistency with the Group's internal credit risk management and assessment practices.  Loans are identified as non-performing or defaulted by a number of characteristics. The key criteria resulting in a classification of non-performing are:  — Where the Group considers a borrower to be unlikely to pay their loans in full without realisation of collateral, regardless of the existence of any past-due amount; or  — The borrower is 90 days or more past due on any material loan. Day count starts when any material amount of principal, interest or fee has not been paid by a borrower on the due date.  The criteria for the definition of financial distress and forbearance are included in the Group's Forbearance Policy. Criteria for identification and treatment of non-performing exposures and unlikeliness to pay are included in the Group's Definition of Default and Credit Impairment Policy.  Further details on the Group's non-performing loans are outlined under template 32: EU CR2: Changes in the stock of non-performing loans and advances.
Article 442 (a) and (b) CRR	b	The extent of past- due exposures (more than 90 days) that are not considered to be impaired and the reasons for this.	In line with the Group's definition of default which is aligned to the EBA 'Guidelines on the application of the definition of default' under Article 178 of Capital Requirements Regulation and ECB Banking Supervision Guidance to Banks on Non-performing loans, all exposures 90 DPD are deemed impaired.

Article 442 (a) and (b) CRR	Description of methods used for determining general and specific credit risk adjustments.
and (b)	determining general and specific credit risk

The Group, in estimating its ECL allowance does so in line with the expected credit loss impairment model as set out by the International Financial Reporting Standard 9 Financial Instruments ('the standard'). This model requires a timely recognition of ECL across the Group.

The standard does not prescribe specific approaches to be used in estimating ECL allowances, but stresses that the approach must reflect the following:

An unbiased and probability weighted amount that is determined by evaluating a range of

- nossible outcomes:
- Underlying models should be point in time and forward looking recognising economic conditions;
- The ECL must reflect the time value of money;
- A lifetime ECL is calculated for financial assets in Stages 2 and 3 and Purchased or Originated Credit Impaired ('POCI'); and
- The ECL calculation must incorporate reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

The standard defines credit loss as the difference between all contractual cash flows that are due to an entity in accordance with the contract and all the cash flows that the entity expects to receive (i.e. all cash shortfalls), discounted at the original effective interest rate ('EIR') or an approximation thereof (see 'Measurement' section below).

ECLs are defined in the standard as the weighted average of credit losses across multiple macroeconomic scenarios, with weights assigned based on the probability of each scenario occurring and are an estimate of credit losses over the life of a financial instrument.

The ECL model applies to financial instruments measured at amortised cost or at fair value through other comprehensive income. In addition, the ECL approach applies to lease receivables, loan commitments and financial guarantee contracts that are not measured at fair value through profit

A key principle of the ECL model is to reflect any relative deterioration or improvement in the credit quality of financial instruments occurring (e.g. change in the risk of a default). The ECL amount recognised as a loss allowance or provision depends on the extent of credit deterioration since initial recognition together with the impact on credit risk parameters.

#### Bases of Measurement

Under the standard, there are two measurement bases:

- 12-month ECL (Stage 1), which applies to all financial instruments from initial recognition as long as there has been no significant increase in credit risk; and
- Lifetime ECL (Stages 2 and 3 and POCI), which applies when a significant increase in credit risk has been identified on an account (Stage 2), an account has been identified as being credit-impaired (Stage 3) or when an account meets the POCI criteria.

Financial assets are allocated to stages dependent on credit quality relative to when assets were originated. A financial asset, including financial assets acquired by the Group, can only originate in either Stage 1 or POCI.

### Credit risk at origination

Credit risk at origination ('CRAO') is a key input into the staging allocation process. The origination date of an account is determined by the date on which the Group became irrevocably committed to the contractual obligation and the account was first graded on an appropriate model.

For undrawn credit facilities, the Group uses the date of origination as the date when it becomes party to the irrevocably contractual arrangements or irrevocable commitment. For overdrafts which have both drawn and undrawn components, the date of origination is the same for both.

The Group uses best available information for facilities which originated prior to a credit risk rating model or scorecard being in place.

For accounts that originated prior to 1 January 2018, a neutral view of the macroeconomic outlook at the time is used, i.e. where macroeconomic variables are used in the Lifetime PD models, long-run averages are used instead of historical forecasts.

### Stage 1 characteristics

Obligations are classified Stage 1 at origination or at acquisition by the Group, unless POCI, with a 12 month ECL being recognised. These obligations remain in Stage 1 unless there has been a significant increase in credit risk.

Accounts can also return to Stage 1 if they no longer meet either the Stage 2 or Stage 3 criteria, subject to satisfaction of the appropriate probation periods, in line with regulatory requirements.

### Stage 2 characteristics

Obligations where there has been a 'significant increase in credit risk' ('SICR') since initial recognition but do not have objective evidence of credit impairment are classified as Stage 2. For these assets, lifetime ECLs are recognised.

The Group assesses at each reporting date whether a significant increase in credit risk has occurred on its financial obligations since their initial recognition. This assessment is performed on individual obligations rather than at a portfolio level. If the increase is considered significant, the obligation will be allocated to Stage 2 and a lifetime expected credit loss will apply to the obligation. If the change is not considered significant, a 12 month expected credit loss will continue to apply and the obligation will remain in Stage 1.

### SICR assessment

The Group's SICR assessment is determined based on both quantitative and qualitative measures:

Quantitative measure: This measure reflects an arithmetic assessment of the change in credit risk arising from changes in the probability of default. The Group compares each obligation's annualised average probability weighted residual origination lifetime probability of default ('LTPD') (see 'Credit risk at origination') to its current estimated annualised average probability weighted residual LTPD at the reporting date. If the difference between these two LTPDs meets the quantitative definition of SICR, the Group transfers the financial obligation into Stage 2. Increases in LTPD may be due to credit deterioration of the individual obligation or due to macroeconomic factors or a combination of both. The Group has determined that an account had met the quantitative measure if the average residual LTPD at the reporting date was at least double the average residual LTPD at origination, and the difference between the LTPDs was at least 50bps or 85bps in the case of residential mortgages. The appropriateness of this threshold is kept under review by the Group.

Qualitative measure: This measure reflects the assessment of the change in credit risk based on the Group's credit management and the individual characteristics of the financial asset. This is not model driven and seeks to capture any change in credit quality that may not be already captured by the quantitative criteria. The qualitative assessment reflects pro-active credit management including monitoring of account activity on an individual or portfolio level, knowledge of client behaviour, and cognisance of industry and economic trends.

The criteria for this qualitative trigger include, for example:

- A downgrade to watch grade of the borrower's/facility's credit grade reflecting the increased credit management focus on these accounts; and/or
- Forbearance has been provided and the account is within the probationary period.
- Lender assessed SICR triggers: For non-retail portfolios, a suite of lender assessed triggers are in place to ensure appropriate and timely identification of increased credit risk, which when occur, trigger a SICR event.

The criteria for this lender assessed trigger include, for example:

- A post distressed restructure payment default occurs where the borrower is neither in default nor forborne:
- A material adverse event has occurred for the borrower which may impact the borrower's ability to repay such as: adverse publicity which raises concerns over the viability of a business; loss of key personnel (CEO/CFO/COO) which raises concerns over the strategy/viability of the business or significant negative macroeconomic events (including but not limited to economic or market volatility, changes in legislation and technological threats to an industry, changes in access to markets) where the financial impact to the borrower is deemed material.

Backstop indicators: The Group has adopted the rebuttable presumption within IFRS 9 that loans greater than 30 days past due represent a significant increase in credit risk.

Where SICR criteria are no longer a trigger, the account can exit Stage 2 and return to Stage 1.

#### Stage 3 characteristics

Defaulted loans (with the exception of newly originated loans that are in Stage 1 or POCI) are classed as credit impaired and allocated to Stage 3. Where default criteria are no longer met, the borrower exits Stage 3 subject to a probation period, in line with regulatory requirements. The key criteria resulting in a classification of default are:

- The key criteria resulting in a classification of default are:

   Where the Group considers a borrower to be unlikely to pay their loans in full without realisation of collateral, regardless of the existence of any past-due amount; or

   The borrower is 90 days or more past due on any material loan (day count starts when any
  - The borrower is 90 days or more past due on any material loan (day count starts when any
    material amount of principal, interest or fee has not been paid by a borrower at the date it
    was due).

Identification of non-performing exposures and unlikeliness to pay are included in the Group's Definition of Default and Credit Impairment Policy.

Purchased or originated credit impaired ('POCI')

POCIs are assets originated credit impaired and have a discount to the contractual value when measured at fair value. The Group uses an appropriate discount rate for measuring ECL in the case of POCIs which is the credit-adjusted effective interest rate. This rate is used to discount the expected cash flows of such assets to fair value on initial recognition.

POCI obligations remain outside of the normal stage allocation process for the lifetime of the obligation. The ECL for POCI obligations is always measured at an amount equal to lifetime expected credit losses. The amount recognised as a loss allowance for these assets is the cumulative change in lifetime expected credit losses since the initial recognition of the assets rather than the total amount of lifetime expected credit losses.

Measurement of expected credit loss

The measurement of ECL is estimated through one of the following approaches:

i) Standard approach: This approach is used for the majority of exposures where each ECL input parameter (Probability of Default - PD, Loss Given Default - LGD, Exposure at Default - EAD, and Prepayments - PP) is developed in line with standard modelling methodology. The Group's IFRS 9 models have been developed and approved in line with the Group's Model Risk Management Framework.

ii) Simplified approach: For portfolios not on the standard approach, the Group has followed a simplified approach. This approach consists of applying portfolio level ECL averages, drawn from similar portfolios, where it is not possible to estimate individual parameters. These generally relate to portfolios where specific IFRS 9 models have not been developed due to immateriality, low volumes or where there are no underlying grading models. As granular PDs are not available for these portfolios, a non-standard approach to staging is required with reliance on the qualitative criteria (along with the 30 days past due back-stop).

iii) Discounted cash-flows ('DCFs'): Assets are grouped together and modelled based on asset classification and sector with the exception of those Stage 3 assets where a DCF is used. DCFs are used as an input to the ECL calculation for Stage 3 credit impaired exposures where gross credit exposure is  $\geq \in 1$  m (Republic of Ireland) or  $\geq £$  500,000 (UK). Multiple DCFs are captured where gross credit exposure is  $\geq \in 5$  m (Republic of Ireland) or  $\geq £$  5 m (UK) or cases in scope for the Group Leveraged Lending Policy, to reflect the case specific impacts of up and downside scenarios for these higher value exposures.

Collateral valuations and the estimated time to realisation of collateral is a key component of the DCF model. The Group incorporates forward looking information in the assessment of individual borrowers through the credit assessment process. Where a single DCF is utilised this assessment produces a base case ECL. This is then adjusted to incorporate the impact of multiple scenarios on the base ECL, by using a proportional uplift obtained from ECL modelled sensitivities in the same/ similar portfolio. Where a range of scenarios are captured through multiple DCF's these are probability weighted to produce the final ECL. An adjustment is made for cases with very low final ECL to ensure a minimum level of ECL is maintained, this is derived through reference to ECL model outputs.

iv) Management judgement: Where the estimate of ECL does not adequately capture all available forward looking information about the range of possible outcomes, or where there is a significant degree of uncertainty, management judgement may be considered appropriate for an adjustment to ECL. The management adjustment must consider all relevant and supportable information, including but not limited to, historical data analysis, predictive modelling and management experience. The methodology to incorporate the adjustment should consider the degree of any relevant over collateralisation (headroom) and should not result in a zero overall ECL unless there is sufficient headroom to support this.

### Effective interest rate

The ECL must incorporate the time value of money discounted to the reporting date using the effective interest rate ('EIR') determined at initial recognition or an approximation thereof.

- The Group uses an approximation approach based on the account level interest rate when calculating ECL which is applied to both drawn and undrawn commitments.
- This approach is subject to an annual assessment that all approximations remain appropriate and do not result in a material misstatement of the ECL.
- The Group has tested the appropriateness of using current interest rates as an approximation for the discount rates required for measuring ECLs. This testing determined that using the current interest rates as the discount rates is an appropriate approximation.

### Policy elections and simplifications

Low credit risk exemption

The Group utilises practical expedients, as allowed by IFRS 9, for the stage allocation of particular financial instruments which are deemed 'low credit risk'. This practical expedient permits the Group to assume, without more detailed analysis, that the credit risk on a financial instrument has not increased significantly since initial recognition if the financial instrument is determined to have 'low credit risk' at the reporting date. The Group allocates such assets to Stage 1.

Under IFRS 9, the credit risk on a financial instrument is considered low if:

— the financial instrument has a low risk of default;

- the borrower has a strong capacity to meet its contractual cash flow obligations in the near
- adverse changes in economic business conditions in the longer term may, (but will not necessarily) reduce the ability of the borrower to fulfil its contractual cash flow obligations.

This low credit risk exemption is applied to particular assets within the Treasury Debt Securities Portfolio, Capital Markets Collateralised Loan Obligation Bonds and for Loans and Receivables to Banks, specifically assets which have an internal grade equivalent to an external investment grade rating (BBB-) or higher.

The Group applies a quantitative backstop trigger of tripling of probability of default subject to a minimum threshold movement of 30bps to determine whether assets subject to the low credit risk exemption should be allocated to Stage 2. Additionally, if any of such assets are on a watch list based on agreed criteria, they are allocated to Stage 2.

### Short term cash

The Group's IFRS 9 Impairment Policy does not require calculation of an ECL for short term cash at central banks and other banks which have a low risk of default with a very low risk profile. The calculation of the ECL at each reporting date would be immaterial given these exposures' short term nature and their daily management.

### Lease receivables and trade receivables

For lease receivables, the Group has elected to use its standard approach for both stage allocation and the ECL calculation and has elected to use an expedient (simplified approach) for trade receivables.

#### IFRS 9 FCL Credit risk models

The IFRS 9 ECL credit risk models

The IFRS 9 ECL models provide the risk parameters which are the inputs into the model driven estimate of ECL which used across all Stage 1 and Stage 2 assets plus all non-DCF Stage 3 exposures on the standard approach to ECL.

### IFRS 9 Portfolio Delineation

The IFRS 9 models are delineated into retail and non-retail portfolios. The retail IFRS 9 portfolios provide exposure level risk parameter estimates which take into account borrower level characteristics and metrics where appropriate, whilst the non-retail portfolios provide metrics which are either borrower or connection level estimates.

### Probability of default

Probability of default ('PD') is the likelihood that an account or borrower defaults over an observation period, given that they are not currently in default, for each year of the expected contractual lifetime of the exposure. The PD is a point in time estimate which is reflective of the current and expected economic conditions.

In order to capture the appropriate risk dynamics across the lifetime of the exposure the development process considers:

- Macroeconomic effects captured through factors such as unemployment rate and GDP;
- Cross-sectional risk discriminators in particular the internal rating model outputs plus other factors such as forbearance and days past due; and
- Seasoning factors such as product type, delinquency and forbearance status.

#### Loss given default

Loss given default ('LGD') is a current assessment of the amount that will not be recovered in the event of default, taking account of future conditions. It can be thought of as the difference between the amount owed to the Group (i.e. the exposure) and the net present value of future cash flows less any relevant costs expected to be incurred in the recovery process. If an account returns to performing from default (excluding any loss making concession) or if the discounted post-default recoveries are equal to or greater than the exposure, the realised loss is zero.

The LGD modelling approach depends on whether the facility has underlying security and, if so, the nature of that security. The following sets out the general approaches to the portfolios:

For unsecured loans, a cash flow curve, which estimates the cumulative cash received following default until the loan is written-off or returns to performing, is used to estimate the future recovery amount. This is discounted at the effective interest rate and compared to the current outstanding balance. Any shortfall between the recovery amount and the outstanding balance is the LGD used to estimate ECL. Where appropriate, this may then be adjusted to reflect economic conditions.

For secured loans the following may be considered:

- The value of underlying collateral is estimated at the forecasted time of disposal (taking into account forecasted market price growth/falls and haircuts on market values that are expected at the date of sale plus associated costs) in order to calculate the future recovery
- The potential for the exposure to be deleveraged through a portfolio sale taking into
- account the costs associated with same; and Paths for returning to the performing portfolios such as forbearance and self-cure.

### Non-retail portfolios

For unsecured loans, characteristics such as borrower sector and nature of collateral linked to affiliated accounts under the same customer group are used to determine future losses based on historical experience of discounted recoveries.

For secured loans, the value of the underlying property collateral is estimated at the reporting date. This is used to estimate the ECL based on historical experience of discounted recoveries.

### Exposure at default

Exposure at default ('EAD') is defined as the exposure amount that will be owed by a customer at the time of default. This will comprise changes in the exposure amount between the reporting date and the date that the customer defaults. This may be due to repayments, interest and fees charged and additional drawdowns by the customer.

			Prepayments For term credit products, prepayment occurs where a customer fully prepays an account prior to the end of its contractual term. For revolving credit products, 'prepayment' is defined as the cessation of use and withdrawal of the facility provided that the account was not in default prior to closure.  Prepayment is used in the lifetime ECL calculation for Stage 2 loans to account for the proportion of the facilities/customers that prepay each year.  Determining the period over which to measure ECL Both the origination date and the expected maturity of a facility must be determined for ECL purposes. The origination date is used to measure credit risk at origination.  The expected maturity is used for assets in Stage 2, where the ECL must be estimated over the remaining life of the facility.  The expected maturity approach is:  - Term credit products: the contractual maturity date, with exposure and survival probability adjusted to reflect behaviour i.e. amortisation and prepayment;  - Revolving credit products: the period may extend beyond the contractual period over which the Group is exposed to credit risk, e.g. overdrafts and credit cards. The Group's approach is to use a modelled behavioural life estimate for these obligations for ECL calculation purposes.  Forward looking indicators in the models For ECL calculations reliant on models in the standard and simplified approaches, forward looking indicators are incorporated into the models through the use of macroeconomic variables. These have been identified statistically as the key macroeconomic variables that drive the parameter being assessed (e.g. PD or LGD). The final model structure incorporates these as inputs with the 12 month and lifetime calculations utilising the macroeconomic forecasts for each scenario. In circumstances where there is a risk that the modelled output fails to capture the appropriate response to changes in the macroeconomic environment such as inflation and interest rate changes, these risks are captured through the use o
Article 442 (a) and (b) CRR	d	The institution's own definition of a restructured exposure used for the implementation of point (d) of Article 178(3) CRR specified by the EBA Guidelines on default in accordance with Article 178 CRR when different from the definition of forborne exposure defined in Annex V to Commission Implementing Regulation (EU) 680/2014.	The definition of restructured exposures is aligned to the definition of forborne exposures.

### 30: Template EU CR1 - Performing and non-performing exposures and related provisions

As per Article 442, points (c) and (e) the template below presents gross carrying amount (including accrued interest) of performing and non-performing exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, accumulated partial write-off, and collaterial and financial guarantees received, according to the scope of regulatory consolidation.

The main movements between June to December 2024 are as follows:

Cach balances a central banks and other demand deposits his increased by £1.1 bn. This is primarily driven by an increase in customer accounts.

Loss and advances performing exposures has increased by £2.5 bn. This is primarily driven by strong new lending exceeding redemptions and the acquisition of loans from Ulster Bank.

		а	b	С	d	e	f	g	h	-	j	k	1	m	n	0
			Gross ca	rrying amoun	t/nominal amount			Accumulated i	mpairment, acc		ive changes in f sions	air value due to	credit risk and		Collateral and financial guarantees received	
		Per	rforming exposures		Non-per	forming exposu		Performinį impai	g exposures – ac rment and prov	isions	impairment, a	ing exposures – ccumulated neg ue to credit risk	gative changes and provisions	Accumulated partial write-off	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			
005	Cash balances at central banks and other demand deposits	37,063	37,062	1	-	-	-	0	0	0	-	-	-	-	-	-
010	Loans and advances <sup>1</sup>	76,983	68,844	8,001	2,007	-	1,894	(704)	(184)	(524)	(641)	-	(648)	(170)	53,924	1,195
020	Central banks	242	242	-	_	-	-	-	_	_	_	_	_	_	-	_
030	General governments	78	77	1	0	-	0	0	0	0	0	_	0	_	0	0
040	Credit institutions	5,928	5,928	-	_	-	-	0	0	-	-	-	_	_	5,245	-
050	Other financial corporations	3,937	3,183	753	11	-	11	(66)	(8)	(58)	(10)	_	(10)	(15)	2,568	0
060	Non-financial corporations	25,577	21,135	4,374	877	-	871	(477)	(142)	(336)	(316)	-	(319)	(40)	9,367	440
070	Of which SMEs	7,591	5,154	2,434	693	-	688	(241)	(57)	(185)	(232)	-	(234)	(27)	4,506	394
080	Households	41,222	38,279	2,873	1,120	-	1,011	(161)	(34)	(129)	(314)	-	(320)	(115)	36,744	755
090	Debt securities	18,550	18,550	-	-	-	-	(3)	(3)	-	-	-	_	-	2,616	_
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	7,897	7,897	-	_	-	-	(1)	(1)	_	_	_	_	_	60	-
120	Credit institutions	7,471	7,471	_	-	_	-	(1)	(1)	-	-	-	_	_	268	-
130	Other financial corporations	2,311	2,311	-	-	-	-	0	0	-	-	-	_	-	2,288	_
140	Non-financial corporations	872	872	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	17,690	16,230	1,458	104	_	98	44	16	27	13	_	12		-	-
160	Central banks	_	_	-	-	_	-	_	_	_	_	_	_		_	-
170	General governments	337	337	0	-	-	_	0	0	0	-	-	_		-	_
180	Credit institutions	382	380	2	-	-	-	0	0	0	-	-	_		-	-
190	Other financial corporations	399	378	22		_	2	0	0	0	_	_	_		-	-
200	Non-financial corporations	11,233	10,105	1,126	77	-	73	32	14	18	11	_	10		_	-
210	Households	5,339	5,031	307	24	-	24	12	3	9	2	-	2		-	-
220	Total	150,287	140,687	9,460	2,111	-	1,992	(751)	(204)	(551)	(653)	_	(661)	(170)	56,540	1,195

\*Loars and advances includes amortised loans (including Purchased or Originated Circlit Impaired (POCI)) and Fair Value Through the P&L (PVTPL) loans. The 'of which' staging columns do not include FVTPL or POCI values as these are not subject to IFRS9 staging.

### 31: Template EU CR1-A - Maturity of exposures

As per Article 442 point (g), the template below provides a breakdown of gross carrying amount by residual contractual maturities net of related accumulated impairment, provisions, accumulated change in fair value due to credit risk.

The main movements in maturity bands between June to December 2024 are within Loans and advances, primarily driven by strong new lending and the acquisition of Ulster Bank loans.

		а	b	С	d	е	f			
		Net exposure value								
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total			
Γ	1 Loans and advances	2,098	9,394	22,475	43,678		77,646			
Γ	2 Debt securities	_	888	8,064	9,595	_	18,548			
Γ	3 Total	2,098	10,283	30,540	53,274	_	96,193			

### 32: Template EU CR2 - Changes in the stock of non-performing loans and advances

As per Article 442 point (f) the template below presents movements of gross carrying amounts (including accrued interest) of non-performing loans and advances (NPL) between December 2023 to December 2024. The non-performing values in this template are in accordance with Article 178 Default of an obligor.

The outflows on NPLs is primarily due to loan repayments.

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	1,985
020	Inflows to non-performing portfolios	1,347
030	Outflows from non-performing portfolios	(1,325)
040	Outflows due to write-offs	(126)
050	Outflow due to other situations	(1,200)
060	Final stock of non-performing loans and advances	2,007

### 33: Template EU CQ1 - Credit quality of forborne exposures

As per Article 442 point (c) the template below presents the gross carrying amount (including accrued interest) of forborne exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, and collateral and financial guarantees received, according to the scope of regulatory consolidation.

Performing forborne loans & non-performing forborne loans both decreased between June to December 2024 by € 0.2 bn respectively.

		a	b	С	d	е	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures			Accumulated i accumulated changes in fai to credit i provis	d negative ir value due risk and	Collateral received and financial guarantees received on forborne exposures		
			Non-pe	erforming fo	orborne	On performing forborne exposures	On non- performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures
				Of which defaulted	Of which impaired				with forbearance measures
005	Cash balances at central banks and other demand deposits	_	_	_	_	_	_	_	_
010	Loans and advances	881	861	861	860	(91)	(297)	1,116	510
020	Central banks	_	_	_	_	_	_	_	_
030	General governments	_	_	_	_	_	_	-	_
040	Credit institutions	_	ı	_	_	_	-	l	_
050	Other financial corporations	150	10	10	10	(17)	(10)	133	0
060	Non-financial corporations	545	341	341	341	(67)	(148)	464	151
070	Households	186	510	510	509	(7)	(139)	519	359
080	Debt Securities	-	_	_	_	_	_	_	_
090	Loan commitments given	18	31	31	31	0	1	-	_
100	Total	899	891	891	891	(92)	(298)	1,116	510

34: Template EU CQ3 - Credit quality of performing and non-performing exposures by past due days

As per Article 442 point (d) the template below presents the gross carrying amount/nominal amount [including accrued interest) of performing exposures according to the scope of regulatory consolidation. For the on-balance sheet exposures, the template shows the breakdown by past-due band. The gross non-performing loan (NPC) ratio at 31 December 2024 was 2.54% decreased from 2.66% at December 2023. This ratio is calculated, in accordance with Regulation (EU) 2021/637, as the ratio of the gross value of non-performing loans and advances to the gross value of total loans and advances to the gross value of non-performing loans and advances to

<ul> <li>Increase in Households of €:</li> </ul>	2.1 bn. This is primarily drive	n by strong new lending exceeding	g redemptions and the acquisition of loan

		а	b	c	d	e	f	g	h	i i	j	k	
							Gross carrying a	mount/nominal amount					
		Ι.	Performing exposu	res				N	on-performing exposur	es			
			Not past due or past due s 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due s 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	37,063	37,063	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	76,983	76,938	45	2,007	1,016	264	205	301	151	20	51	2,007
020	Central banks	242	242	-	_	-	-	_	_	_	_	_	-
030	General governments	78	78	-	0	0	-	-	-	0	-	-	0
040	Credit institutions	5,928	5,928	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	3,937	3,937	-	11	1	0	0	10	0	0	0	11
060	Non-financial corporations	25,577	25,569	8	877	520	185	61	74	24	2	11	877
070	Of which SMEs	7,591	7,583	8	693	355	184	59	67	21	2	5	693
080	Households	41,222	41,185	37	1,120	495	79	145	217	127	18	40	1,120
090	Debt securities	18,550	18,550	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	_
110	General governments	7,897	7,897	-	-	-	-	-	-	-	-	-	_
120	Credit institutions	7,471	7,471	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	2,311	2,311	-	-	-	-	-	-	-	-	-	_
140	Non-financial corporations	872	872	-	-	-	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	17,690			104								104
160	Central banks	-			-								-
170	General governments	337			-								-
180	Credit institutions	382			-								_
190	Other financial corporations	399			2								2
200	Non-financial corporations	11,233			77								77
210	Households	5,339			24								24
220	Total	150,287	132,552	45	2,111	1,016	264	205	301	151	20	51	2,111

As per Article 442, points (c) and (e), the template below presents gross carrying amount (includes accrued interest) of performing and non-performing exposures and the related accumulated impairment, provisions and accumulated change in fair value due to credit risk, according to the scope of regulatory consolidation.

The on-balance sheet exposures is a total of debt securities and loans and advances only. This balance excludes cash balances at central banks and other demand deposits. Individual countries disclosed based on combined on and off-balance sheet exposures reflect the top 10 country exposures and represent greater than 94% of total exposure.

The main movement between June and December 2024 is as follows:

• The increase is primarily driven by strong new lending, which exceeded redemption, and the acquisition of loans from Ulster Banks.

		а	b	С	d	е	f	g
		Gr	oss carrying/nor	ninal amount				
			Of which non	-performing <sup>1</sup>			Provisions on off-	Accumulated negative
				Of which defaulted	Of which subject to impairment <sup>1</sup>	Accumulated impairment	balance-sheet commitments and financial guarantees given	changes in fair value due to credit risk on non- performing exposures
010	On-balance-sheet exposures	97,541		2,007		(1,348)		_
020	Ireland	61,737		1,668		(1,077)		_
030	United Kingdom	14,033		264		(182)		_
040	France	5,098		0		(6)		_
050	United States	3,809		1		(13)		_
060	Canada	2,138		0		(3)		_
061	Spain	1,628		0		(3)		_
062	Netherlands	1,091		0		(8)		_
063	Germany	851		2		(13)		_
064	Australia	744		2		(1)		_
065	Luxembourg	575		7		(10)		_
070	Other countries <sup>2</sup>	5,836		62		(33)		_
080	Off-balance-sheet exposures	17,794		104			56	
090	Ireland	13,244		80			46	
100	United Kingdom	3,315		18			9	
110	France	214		0			0	
120	United States	525		0			0	
130	Canada	23		0			0	
131	Spain	25		0			0	
132	Netherlands	19		0			0	
133	Germany	57		0			0	
134	Australia	11		0			0	
135	Luxembourg	81		5			0	
140	Other countries <sup>3</sup>	281		1			1	
150	Total	115,335		2,111		(1,348)	56	0

<sup>&</sup>lt;sup>1</sup> In line with the requirements for large institutions with an NPL ratio (in accordance with Regulation (EU) 2021/637) lower than 5%, columns 'Of which non-performing' and 'of which subject to impairment' are not required to be disclosed.

<sup>&</sup>lt;sup>2</sup>Other countries comprise exposures with Albania, Andorra, Argentina, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belgium, Bermuda, Brazil, British Virgin Islands, Bulgaria, Cayman Islands, Chile, China, Colombia, Congo, Costa Rica, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Finland, Gambia, Greece, Guernsey, Guinea, Holy See (Vatican City State), Hong Kong, Hungary, Iceland, India, Indonesia, Isle Of Man, Israel, Italy, Jamaica, Japan, Jersey, Jordan, Kenya, Kuwait, Latvia, Lebanon, Lithuania, Malaysia, Mauritius, Mayotte, Mexico, Monaco, Montserrat, Morocco, Namibia, New Zealand, Nicaragua, Norway, Oman, Other Countries (Exposures With Supernational Organisations), Pakistan, Paraguay, Philippines, Poland, Portugal, Province Of China Taiwan, Qatar, Republic Of Korea, Romania, Russian Federation, Saudi Arabia, Singapore, Slovakia, Slovenia, South Africa, Sri Lanka, Sweden, Switzerland, Thailand, Tunisia, Turkey, U.S. Virgin Islands, Uganda, United Arab Emirates, Vietnam.

<sup>&</sup>lt;sup>3</sup>Other countries comprise exposures with Andorra, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belgium, Bermuda, Bosnia And Herzegovina, Brazil, British Indian Ocean Territory, British Virgin Islands, Bulgaria, Cayman Islands, Chile, China, Colombia, Costa Rica, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Ethiopia, Finland, Georgia, Ghana, Greece, Guinea, Hong Kong, Hungary, India, Isle Of Man, Israel, Italy, Jamaica, Japan, Jersey, Jordan, Kenya, Kuwait, Latvia, Lebanon, Liberia, Liechtenstein, Lithuania, Malawi, Malaysia, Mauritius, Mayotte, Mexico, Monatco, Montserrat, Morocco, Nepal, New Zealand, Nicaragua, Norway, Oman, Pakistan, Paraguay, Philippines, Poland, Portugal, Province Of China Taiwan, Qatar, Republic Of Korea, Réunion, Romania, Russian Federation, Saudi Arabia, Singapore, Slovakia, Slovenia, South Africa, Sri Lanka, Sweden, Switzerland, Thailand, Turkey, Uganda, Ukraine, United Arab Emirates, Zambia, Zimbabwe.

### 36: Template EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry

As per Article 442, points (c) and (e), the template below presents gross carrying amount (including accrued interest) of loans and advances to non-financial corporations by industry and the related accumulated impairment and accumulated change in fair value due to credit risk, according to the scope of regulatory consolidation.

The main movement between June to December 2024 is as follows:

• The gross carrying amount increase of € 0.2bn is primarily due to renewable energy & infrastructure and corporate lending as per Row 040 and Row 090.

		а	b	С	d	е	f
			Gross carr	ying amount			
			Of which non-performing <sup>1</sup>		Of which loans and advances subject to	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non- performing
				Of which defaulted	impairment <sup>1</sup>		exposures
010	Agriculture, forestry and fishing	704		44		(18)	_
020	Mining and quarrying	57		1		(1)	_
030	Manufacturing	2,589		41		(58)	_
040	Electricity, gas, steam and air conditioning supply	4,572		3		(24)	_
050	Water supply	260		4		(6)	_
060	Construction	1,084		55		(65)	_
070	Wholesale and retail trade	1,859		55		(53)	_
080	Transport and storage	1,592		72		(70)	_
090	Accommodation and food service activities	2,385		90		(65)	_
100	Information and communication	1,422		49		(33)	_
110	Financial and insurance activities	_		_		_	_
120	Real estate activities	5,974		425		(321)	_
130	Professional, scientific and technical activities	763		6		(12)	
140	Administrative and support service activities	527		6		(7)	_
150	Public administration and defence, compulsory social security	_		_		_	_
160	Education	162		3		(1)	_
170	Human health services and social work activities	1,328		10		(40)	_
180	Arts, entertainment and recreation	417		5		(7)	_
190	Other services	759		7		(10)	_
200	Total	26.454		877		(793)	_

<sup>&</sup>lt;sup>1</sup> In line with the requirements for large institutions with an NPL ratio (in accordance with Regulation (EU) 2021/637) lower than 5%, columns 'Of which non-performing' and 'Of which loans and advances subject to impairment' are not required to be disclosed.

# 37: Template EU CQ7 - Collateral obtained by taking possession and execution

As per Article 442 point (c) the template below presents information on the instruments that were cancelled in exchange for the collateral obtained by taking possession and on the value of the collateral obtained by taking possession.

		a b			
		Collateral obtained by taking possession			
		Value at initial recognition	Accumulated negative changes		
010	Property, plant and equipment (PP&E)	_	_		
020	Other than PP&E	2	_		
030	Residential immovable property	2	_		
040	Commercial Immovable property	_	_		
050	Movable property (auto, shipping, etc.)	_	_		
060	Equity and debt instruments	_	_		
070	Other collateral	_	_		
080	Total	2	_		

Chapter 9. Disclosure of the use of credit risk mitigation techniques

# 38: Table EU CRC – Qualitative disclosure requirements related to CRM techniques

As per Article 453, points (a) to (e), table EU CRC provides qualitative information on the mitigation of credit risk.

Legal basis	Row number		Qualitative information
Article 453(a)		sheet netting and an	Risk mitigation techniques, as set out in credit policies, are used in the management of credit portfolios.  Financial assets and financial liabilities are offset and the net amount reported on the statement of financial position if, and only if, there is a currently enforceable legal right to set off the recognised amounts and there is an intention to settle on a net basis, or to realise the asset and settle the liability simultaneously.  AIB mitigates counterparty credit risk arising from derivative and repurchase exposures through the use of market standard netting agreements and collateral in the case of repurchase agreements (for example, International Swaps and Derivatives Association ('ISDA') master agreements and Global Master Repurchase Agreements ('GMRA')). Where supported by legal analysis on enforceability, AIB exposure to the counterparty is netted against amounts the counterparty owes AIB in accordance with relevant regulatory and internal policies.

Article 453(b)	(b)	The core features of policies and processes for eligible collateral evaluation and management;	Methodologies for valuing immovable property collateral Details on the valuation rule methodologies applied and processes used to assess the value of immovable property assets taken as collateral are described in the Group Property Valuation Policy and Property Valuation Guidance. Both documents are subject to an annual review.
			As property loans, including residential mortgages, represent a significant concentration within the Group's loans and advances to customer's portfolio, some key principles have been applied in respect of the valuation of property collateral held by the Group.
			The value of immovable property collateral is assessed at loan origination and at certain stages throughout the credit lifecycle in accordance with the Group Property Valuation Policy e.g. at annual review where required.
			In accordance with the Group Property Valuation Policy and Property Valuation Guidelines, the Group employs a number of methods to assist in reaching appropriate valuations for property collateral held:
			<ul> <li>a. External valuation firms on the Group's Valuers Panel, are engaged by the Group to undertake valuations of immovable property collateral in accordance with the rules set out in the Group Property Valuation Policy.</li> <li>b. Independent professional internal valuations are completed in limited circumstances (e.g. agricultural land) using a desktop valuation approach by professional qualified internal valuers who are independent of the credit process in the second line of defence. The assets being valued by this means must have an independent professional external valuation completed within the past 3 years.</li> </ul>
			c. Internal valuations are completed by first line of defence Case Managers pursuant to the rules in the Property Valuation Policy and in line with the Property Valuation Guidance, which provides appropriate valuation methodology guidance. These include the following valuation methodologies;
			<ul> <li>i. Index valuation approach – used for residential property;</li> <li>ii. Comparable valuation approach – a basic level of valuation methodology used to value agricultural land or as a sense check for the valuation of residential, commercial or development land;</li> <li>iii. Commercial investment valuation approach – used for the valuation of commercial property using the Groups commercial investment yield matrices;</li> </ul>
			<ul> <li>iv. Residual valuation approach – used for the valuation of development land or land with development potential; and</li> <li>v. Profits valuation approach – used for the valuation of trading assets e.g., hotels, licensed premises, convenience stores etc. using the Groups stabilized earnings before interest, taxes, depreciation and amortization (EBITDA) matrices.</li> </ul>
			Methodologies for valuing movable property collateral Details on the valuation rule methodologies applied and processes used to assess the value of movable property assets such as plant and machinery, marine vessels etc. taken as collateral are described in the Group Property Valuation Policy and Movable Property Valuation Guidance & Operational Procedures and are both reviewed annually.
			The value of movable property collateral is assessed at loan origination and at certain stages throughout the credit life cycle in accordance with the Group Property Valuation Policy e.g. at annual review where required.
			In accordance with the Group Property Valuation Policy and Movable Property Valuation Guidance & Operational Procedures, the Group employs a number of methods to assist in reaching appropriate valuations for movable property collateral held:
			a. External Valuation firms are engaged by the Group to undertake valuations of movable collateral and for marine vessel assets the firms must be on the Group's Valuers Panel, and in accordance with the rules set out in the Group Property Valuation Policy.
			b. Internal valuations are completed by first line of defence Case Managers pursuant to the rules in the Property Valuation Policy and in line with the Movable Property Valuation Guidance & Operational Procedures, which provides appropriate valuation methodology guidance for the different movable collateral types of moveable collateral.

Article 453(c)	(c)	A description of the main types of collateral taken by the institution to mitigate credit risk;	default. Guarantors typically include corporates, individuals, financial institutions and sovereigns. Their creditworthiness is assessed on an individual case- by-case basis. The Group maintains policies which detail the acceptability of specific classes of collateral.
			The principal collateral types for loans and advances are:  —Charges over business assets such as premises, inventory and accounts receivable;  —Charges over other movable collateral assets such as plant & machinery, marine vessels etc;  —Mortgage/legal charge over residential and commercial real estate; and  —Charges over financial instruments such as debt securities and equities.
			The nature and level of collateral required depends on a number of factors such as the type of the credit facility, the term of the credit facility and the amount of exposure. Collateral held as security for financial assets, other than for loans and advances, is determined by the nature of the instrument. Debt securities and treasury products are generally unsecured, with the exception of asset backed securities, which are secured by a portfolio of financial assets.
			Collateral is not usually held against loans and advances to banks, including central banks, except where securities are held as part of reverse repurchase or securities borrowing transactions or where a collateral agreement has been entered into under a master netting agreement or where the bank purchases covered bonds as part of its liquidity portfolio.
			For non-mortgage/non-property lending, where collateral is taken, it will typically include a charge over the business assets such as inventory and accounts receivables. In some cases, a charge over property collateral or a personal guarantee supported by a lien over personal assets may also be taken. Where cash flows arising from the realisation of collateral held are included in the expected credit loss assessments, in many cases management rely on valuations or business appraisals from independent external professionals.
Article 453(d)	(d)	and their creditworthiness used for the purposes of reducing capital requirements,	The perceived strength of a borrower's repayment capacity is the primary factor in granting a loan. The Group uses various approaches to help mitigate risks relating to individual credits, including transaction structure, collateral and guarantees. Collateral and/or guarantees are usually required as a secondary source of repayment in the event of a borrower's default. At a portfolio level, credit risk is assessed in relation to the degree of name, sector and geographic concentration. Changes in concentrations are tracked on a regular basis across the Group's loan portfolio. Where potential risk concentrations are identified, the risk capital implications are assessed and, where appropriate, risk mitigation options (e.g. disposals, securitisations, hedging strategies) are considered. The main types of collateral for loans and advances to customers are described under point (c) above. Credit policy and credit management standards are controlled and set centrally by the credit risk function. As per EU CR3 nil exposures are secured by credit derivatives at 31 December 2024.
Article 453(e)	(e)	Information about market or credit risk concentrations within the credit mitigation taken;	See point (d) above.

### 39: Template EU CR3 - CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

As per Article 453 point (f) this template includes all collateral, financial guarantees and credit derivatives used as credit risk mitigants for all secured exposures, irrespective of whether the standardised approach or the IRB approach is used for RWEA calculation. Any secured exposures by collateral or financial guarantees (eligible or not eligible as CRM techniques under Part Three, Title II, Chapter 4 of the CRR) have been disclosed.

- The main movements between June to December 2024 are as follows: • Loans and advances unsecured carrying amount has increased by  $\in$  4.5 bn. • Loans and advances secured carrying amount has decreased by  $\in$  0.9 bn.

		Unsecured carrying amount	Secured carrying a	amount						
				Of which secured by collateral	Of which secured by financial guarantees					
						Of which secured by credit derivatives				
		a	b	С	d	е				
1	Loans and advances	59,590	55,119	54,670	449	_				
2	Debt securities	15,932	2,616	2,348	268					
3	Total	75,522	57,735	57,018	717	_				
4	Of which non-performing exposures	172	1,195	1,158	37	_				
EU-5	Of which defaulted	172	1,195							

Chapter 10. Disclosure of the use of the standardised approach

### 40: Table EU CRD – Qualitative disclosure requirements related to standardised approach

As per Article 444, points (a) to (d), the table below outlines AIB's use of external credit ratings under the standardised approach for credit risk.

Legal basis	Row number		Qualitative information
Article 444 (a) CRR	(a)	Names of the external credit assessment institutions (ECAIs) and export credit agencies (ECAs) nominated by the institution, and the reasons for any changes over the disclosure period;	Under CRD, institutions are permitted to determine the risk weight of an exposure with reference to the credit assessments of ECAIs.  AIB uses the following ECAIs to assess the credit risk of certain exposures under the standardised approach: - Standard & Poor's Rating Services ("S&P") - Fitch Ratings ("Fitch") - Moody's Investors Service ("Moody's") - Dominion Bond Rating Service ("DBRS")
Article 444 (b) CRR	(b)	The exposure classes for which each ECAI or ECA is used;	ECAIs are used for the calculation of RWEA for standardised institutions balances with external banks.
Article 444 (c) CRR	(c)	A description of the process used to transfer the issuer and issue credit ratings onto comparable assets items not included in the trading book;	Not applicable there is no transfer of issuer and issue credit ratings onto comparable assets.
Article 444 (d) CRR	(d)	The association of the external rating of each nominated ECAI or ECA (as referred to in row (a)) with the risk weights that correspond with the credit quality steps as set out in Chapter 2 of Title II of Part Three CRR (except where the institution complies with the standard association published by the EBA).	AIB uses a combination of the credit weightings assigned by the ECAIs and mapping guidelines issued by the Central Bank of Ireland to map the exposures to the appropriate credit quality assessment step. These guidelines are identical to those issued by the European Banking Authority ("EBA").  The ratings applied to the credit quality assessment steps are outlined in the table below.  Where there are no available credit assessments to map to a credit quality assessment step, the Group assigns risk weights to these exposures in accordance with the CRD requirements for unrated exposures.

Credit Quality Step	S&P/Fitch/DBRS	Moody's
Credit quality assessment step 1	AAA to AA	Aaa to Aa3
Credit quality assessment step 2	A+ to A-	A1 to A3
Credit quality assessment step 3	BBB+ to BBB-	Baa1 to Baa3
Credit quality assessment step 4	BB+ to BB-	Ba1 to Ba3
Credit quality assessment step 5	B+ to B-	B1 to B3
Credit quality assessment step 6	CCC+ and below	Caa1 and below

### 41: Template EU CR4 – Standardised approach – Credit risk exposure and CRM effects

As per Article 453, points (g), (h) and (i) and Article 444 point (e), the template below shows credit risk exposures net of specific credit risk adjustments under the standardised approach both before and after credit risk mitigation 'CRM' and credit conversion factors 'CCF' and the associated RWAs and RWAs density, split by exposure class. The template excludes counterparty credit risk and securitisation exposures.

Main movements between June to December 2024 as detailed below:
The RWA density of 31.60% decreased by 5.64% primarily due to an increase in exposures in central government and banks, regional government or local authorities, public sector entities and Multilateral development banks due to the implementation of the PPU for sovereign exposures. Majority of this PPU resulted in 0% RWA, which resulted in a decrease in RWA density.

CRM measures reflect a number of government issued guarantee schemes that result in exposures after the use of CRM moving from corporate, retail, high risk and exposures in default to central governments or central banks.

		Exposures before C	CF and before CRM	Exposures post C	CF and post CRM	RWAs and R	WAs density
	Exposure classes	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		а	b	С	d	е	f
1	Central governments or central banks	43,636	_	44,161	_	386	0.87 %
2	Regional government or local authorities	1,049	275	1,049	0	1	0.09 %
3	Public sector entities	679	_	679	-	4	0.54 %
4	Multilateral development banks	317		531	-	_	_
5	International organisations	_	_	_	-	_	_
6	Institutions	59	_	59	_	29	49.64 %
7	Corporates	4,998	3,012	4,939	756	5,435	95.43 %
8	Retail	5,154	4,327	4,909	75	3,484	69.90 %
9	Secured by mortgages on immovable property	23,829	1,915	23,829	695	12,654	51.60 %
10	Exposures in default	1,072	54	1,046	10	1,159	109.78 %
11	Exposures associated with particularly high risk	900	632	891	282	1,760	150.00 %
12	Covered bonds	_	_	_	-	_	_
13	Institutions and corporates with a short-term credit assessment	_	_	_	-	_	_
14	Collective investment undertakings	257	159	257	80	505	150.00 %
15	Equity	390	_	390		819	210.09 %
16	Other items	1,905	_	1,905	_	1,115	58.52 %
17	TOTAL	84,243	10,374	84,644	1,897	27,350	31.60 %

### 42: Template EU CR5 – Standardised approach

As per Article 444 point (e) the template below analyses exposures at default 'EAD' under the standardised approach by risk weight, split by exposure class. All amounts presented are post CRM and CCF and net of specific credit risk adjustments but exclude counterparty credit risk and securitisation exposures.

There was no material change in the application of risk weights across the exposure classes. Increases exposures in central government and banks, regional government or local authorities, public sector entities and multilateral development banks due to the implementation of the PPU for sovereign exposures.

								F	isk weigh	t							Total	Of which
	Exposure classes	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Total	unrated
		a	b	С	d	е	f	g	h	i	j	k	- 1	m	n	0	р	q
1	Central governments or central banks	44,007	_	_	_	-	-	_	_	-	_	-	154	_	_	_	44,161	_
2	Regional government or local authorities	1,044	_	I	1	4	I	-	1	1	_	1	1	-	_	_	1,049	1,049
3	Public sector entities	661	-	_	-	18	_	_	1	1	_	1	1	_	_	_	679	679
4	Multilateral development banks	531	_	I	1	I	I	-	1	1	_	1	1	-	_	_	531	531
5	International organisations	_	_	I	ı	I	I	_	I	_	_	-	-	_	_	_	_	_
6	Institutions	-	_	1	_	41	l	-	-	_	11	7	-	_	_	_	59	59
7	Corporates	_	_	_	_	_	_	_			5,696			_	_	_	5,696	5,696
8	Retail exposures	_	_	_	_	_	_	_		4,984	_			_	_	_	4,984	4,984
9	Exposures secured by mortgages on immovable property	1	1	1	1	ı	18,035	-	1	1	6,488	1	1	_	_	_	24,523	24,523
10	Exposures in default	_	_	_	_	_	_	_	_	_	849	207	_	_	_	_	1,056	1,056
11	Exposures associated with particularly high risk	_	_	I	-	I	I	_	-	_	_	1,173	_	-	_	_	1,173	1,173
12	Covered bonds	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_
13	Exposures to institutions and corporates with a short-term credit assessment	-	1	1	1	1	1	_	1	1	_	1	1	_	_	_	_	_
14	Units or shares in collective investment undertakings	_	_	_	-	I	_	_	_	_	_	336	_	_	_	_	336	336
15	Equity exposures				_	-	-	_		_	104	_	286	_	_	_	390	390
16	Other items	664	_	_	_	156		1	_	-	1,083	_		_	_	1	1,905	1,905
17	TOTAL	46,907	_	_	_	220	18,035	1	_	4,984	14,230	1,723	440	_	_	1	86,542	42,381

Chapter 11. Disclosure of use of the IRB approach to credit risk

### 43: Table EU CRE – Qualitative disclosure requirements related to IRB approach

As per Article 452 the table below outlines AIB's use of the IRB Approach to credit risk.

Legal basis	Row number		Qualitative information
Article 452 (a) CRR	(a)	The competent authority's permission of the approach or approved transition	The Group is approved by the Central Bank of Ireland and European Central bank to use the internal ratings based (IRB) approach for a number of portfolios. Portfolios approved for IRB use are detailed in more detail in row (e) below. All other credit risk related exposure is covered under the Standardised approach (see table EU CR6-A for full breakdown of exposures using the standardised approach).
Article 452 (c) CRR	(b)	development, controls and changes, which shall include information on: (i) the relationship between the risk management function and the internal audit function; (ii) the rating system review; (iii) procedure to ensure the independence of the function in charge of reviewing the models from the functions responsible for the development of the models; (iv) the procedure to ensure the accountability of the functions in charge	AIB has a Group Model Risk Management Framework and underpinning Model Risk Policies which include rules across the Model Risk lifecycle which align to regulatory requirements. AIB operates a 3 Lines of Defence (LOD) model in which Model Development is classified as a first line of defence (1LOD) activity with Model Validation sitting in the second line of defence (2LOD) and Group Internal Audit sitting in the third line of defence (3LOD). The Head of Model Validation reports to the Head of Risk Assurance with the Head of IRB Development reporting to the Head of Group Risk Analytics. Regarding the rating system review, the policies describe minimum rules & criteria that model development and validation must follow. The IRB Model Validation Standard sets out the tests and thresholds required for IRB models. The Group Model Risk Management Policy clarifies that the Head of Validation signs off on the Model Validation report and presents the validation information to committee for information to inform a decision on model use. AIB operates under a Model Risk lifecycle which covers: initiation, data, development, validation, implementation, use and monitoring. There are governance steps and controls at every stage of the lifecycle. For model approval the key control is Model Validation independently assessing a model to ensure it is fit for purpose. Each role holder across the model lifecycle is accountable for ensuring adherence to the Group Model Risk Management Framework. There must be a representative from Model Development, Validation and Model Owner present at committees when the models are for approval ensuring accountability of the role holder.
Article 452 (d) CRR	(c)	The role of the functions involved in the development, approval and subsequent changes of the credit risk models;	Model Development in conjunction with the Model Owner are responsible for bringing a model that is fit for business use for approval. This model is then assessed independently by Model Validation. These are the three key role holders for IRB models. The outcome of the validation review plays a key role in advising committee members on its approval for use. Material changes to IRB models must be validated and reported to the highest approval authority for approval. Clear rules for IRB model changes are in place, via the Group IRB Model Risk Policy supported by an IRB Rating System Change Standard, with a quarterly submission to the regulator to notify of any non-material changes to the IRB model suite. Any Material change to an IRB model must be approved by the highest approval authority which is Group Risk Committee (GRC) prior to submission to the ECB for regulatory approval. This committee has received delegated authority from the Management Body to approve IRB models.
Article 452 (e) CRR	(d)	The scope and main content of the reporting related to credit risk models;	IRB Models are subject to annual Periodic Validation as well as quarterly Model Monitoring. Outputs from these activities are communicated through the model risk governance committees. The reporting typically covers: Overall Model Performance, Stability, Model Overrides, and Calibration.

Article 452 (f) A description of the internal ratings (e) process by exposure class, including the number of key models used with respect to each portfolio and a brief discussion of the main differences between the models within the same portfolio, covering: (i) the definitions, methods and data for estimation and validation of PD, which shall include information on how PDs are estimated for low default portfolios whether there are regulatory floors and the drivers for differences observed hetween PD and actual default rates at least for the last three periods: (ii) where applicable, the definitions, methods and data for estimation and validation of LGD, such as methods to calculate downturn LGD, how LGDs are estimated for low default portfolio and the time lapse between the default event and the closure of the exposure: (iii) where applicable, the definitions, methods and data for estimation and validation of credit conversion factors, including assumptions employed in the derivation of those variables

AIB has approval to operate IRB models covering the following portfolios: 1) Mortgages (Advanced) – PDx2, LGD & EAD 2) Commercial SME (Foundation) - PD 3) Corporate (Foundation) - PDx2 & Project Finance (Foundation) 4) and Banks (Foundation). AIB has approval for Permanent Partial Use (PPU) for certain portfolios. Notable portfolios categorised as PPU are as follows: 1.Exposure to Sovereign 2.Non-Retail Portfolios including corporate exposures not within the scope of the IRB Corporate PD model and 3. UK retail portfolios 4. Not for profit. These portfolios are subject to Standardised capital treatment. As part of the Phase 2 IRB Rollout plan a number of portfolios are expected to transition to IRB including: EBS Mortgages, Investment Property, ROI Retail Portfolios and UK Corporate Portfolio, noting that the Phase 1 Rollout plan covers updates to live models prior to the Phase 2 complement. An IRB rating system encompasses all of the methods, processes, controls, data collection and IT systems that support the assessment of credit risk, and assignment of exposures to rating grades, in addition to the PD, EAD and LGD models. Probability of default (PD) is the probability of default of an obligor (customer) (Non Retail) or exposure (Retail) over a one year period. The models in the Retail/ Commercial portfolios are historically high default areas and as such have a common core methodology. These models consist of credit scorecards for risk differentiation with the output calibrated to long run average default rates. The models use behaviour on AIB accounts (Retail and Commercial) and Financial/Qualitative (Non-Retail) data. The non-Retail portfolios tend to be more low default portfolios and as such typically follow a common methodology using statistical techniques supported by human expertise and judgement. Where external rating agency grades are available (primarily Bank and Large Corporate) these are used in both the estimation and validation of estimates. For the Corporate Portfolio there are 3 PD models: two Corporate models, Large Corporate and Mid-Corporate covering the majority of exposure and one specialised lending model which is Project Finance (Project Finance deals include, but are not limited to, Public Private Partnerships (schools, hospitals and prisons), toll roads, power plants and pipelines). Loss given default (LGD) is the ratio of the loss on an exposure due to the default of a counterparty to the amount outstanding at default. A workout approach for LGD models is the Group's preferred approach. AIB currently has permission to use LGD models for the AIB RoI Mortgage portfolio, which are calibrated to allow for economic downturn conditions. Exposure at default (EAD) is the amount outstanding to a counterparty at the time of default. Credit conversion factor (CCF) is the ratio of the currently undrawn amount of a commitment that is expected to be drawn and that would therefore be outstanding at default to the currently undrawn amount of the commitment. The only CCF model currently approved is the Pipeline Mortgage model; this is primarily based on the length of time that the facility has been committed but remains undrawn. All models will use the latest available internal AIB definition of default at the time of model build. Scalars are in place pending the development / approval of new models where there is an underestimation of the relevant risk parameters. New models were implemented in 2024 within the Corporate, SME and Mortgage Rating Systems. Scalars are applied on a modelby-model basis and thus removed as each model is updated, implemented and fully remediated. The Model Development Team review the adequacy of any scalars on an semiannual basis. Model Validation perform an annual periodic validation on IRB models (PD, LGD & EAD) which includes a review of: model performance, model use, and data quality checks. For new models or for material changes to existing models an initial validation takes place. The initial validation includes a review of: model design, documentation, representativeness, data inputs, performance testing, and model use. The approach to validation of each of these portfolios is specified in the IRB Model Validation Standard which ensures that each regulatory requirement for model validation testing is met.

As per Article 452, point (g)(i)-(v) the template below presents the key parameters used for the calculation of capital requirements for credit risk exposures, under the IRB approach, split by PD range. The template includes exposures rated under Foundation IRB and Advanced IRB. All exposures are presented both pre and post CRM and CCF. The template excludes counterparty credit risk, securitisations, equity and non-credit obligation exposures. Gross exposures are presented before specific credit risk adjustments. Throughout this section 'Density of risk weighted exposure amount' represents the 'average risk weighted exposure amount post CCF and post CRM'. 'Number of obligors' corresponds to the number of individual PDs in each band. The Group has not used credit derivatives as a credit risk mitigant for exposures rated under the IRB approach.

- The total IRB portfolio decreased between June to December 2024 predominantly due to the following:

   Central government and central banks exposures decreased by € 8.3 bn due to the implementation of the PPU for sovereign exposures.

   Corporates Specialised Lending exposures increase of € 2.3 bn driven by movement of UK climate capital loans from Standardised to IRB.

A-IRB	PD range	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
	a	b	С	d	e	f	g	h	i	j	k	1	m
Total - with own estimates													
Retail - Secured by immovable property non-SME													
	0.00 to <0.15	_	381	69.06%	263	0.07%	1,239	45.07%		23	8.71%	_	_
	0.00 to <0.10	_	381	69.06%	263	0.07%	1,239	45.07%		23	8.71%	_	_
	0.10 to <0.15	_	_	0.00%	_	0.00%	_	0.00%		_	0.00%	_	_
	0.15 to <0.25	2,563	2	96.64%	2,565	0.16%	20,023	30.36%		277	10.79%	1	_
	0.25 to <0.50	10,329	254	69.48%	10,505	0.35%	67,609	33.88%		2,252	21.44%	12	
	0.50 to <0.75	3,230	10	80.34%	3,238	0.71%	20,771	32.62%		1,115	34.44%	8	(1)
	0.75 to <2.50	2,163	169	69.14%	2,280	1.56%	14,093	32.64%		1,293	56.70%	12	(5)
	0.75 to <1.75	1,293	120	69.85%	1,376	1.16%	8,522	33.08%		664	48.22%	5	(1)
	1.75 to <2.5	870	49	67.41%	903	2.17%	5,571	31.97%		629	69.62%	6	(4)
	2.50 to <10.00	637	20	69.36%	651	6.35%	4,794	29.92%		750	115.27%	12	( - /
	2.5 to <5	368	15	68.12%	378	4.65%	2,716	30.09%		382	101.07%	5	(6)
	5 to <10	270	5	73.09%	273	8.70%	2,078	29.68%		369	134.89%	7	(9)
	10.00 to <100.00	179	3	84.54%	181	24.05%	1,428	29.39%		322	177.92%	13	(-/
	10 to <20	20		76.54%	21		190	29.60%		34	161.79%	1	(1)
	20 to <30	153	_	99.90%	154	24.65%	1,178	29.41%		278	180.78%	11	(7)
	30.00 to <100.00	5	_	99.93%	6	44.15%	60	28.15%		9	160.75%	1	_
	100.00 (Default)	234	2	99.87%	236	100.00%	2,341	50.23%		400	169.28%	87	(/
Subtotal (e	xposure class)	19,335		69.53%	19,919	2.11%	132,298	33.25%		6,431	32.29%	144	, ,
Total (all exposure	s classes)	19,335	840	69.53%	19,919	2.11%	132,298	33.25%		6,431	32.29%	144	(102)

F-IRB	PD range	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	weighted exposure amount after supporting	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
Institutions without own estimates	a	b	С	d	e	f	g	h	i	j	k	I	m
	0.00 to <0.15	6,718	213	8.45%	6,736	0.09%	143	20.87%	2.5	1,295	19.22%	1	(1)
	0.00 to <0.10	3,083	46	9.18%	3,087	0.04%	34	15.62%	2.5	290	9.39%	_	`_
	0.10 to <0.15	3,635	167	8.25%	3,649	0.12%	109	25.32%	2.5	1,005	27.54%	1	(1)
	0.15 to <0.25	_	_	-%	_	-%	_	-%	_	_	-%		<u> </u>
	0.25 to <0.50	173	5	1.59%	173	0.35%	17	36.47%	2.5	123	70.68%	_	_
	0.50 to <0.75		_	-%		-%	_	-%	_		-%	_	_
	0.75 to <2.50	3	1	19.09%	3	1.09%	4	45.00%	2.5	4	137.97%	_	_
	0.75 to <1.75	3	_	19.09%	3	1.09%	4	45.00%	2.5	4	137.97%	_	_
	1.75 to <2.5	_	_	-%	_	-%	_	-%	_		-%		_
	2.50 to <10.00		_	-%	_	4.38%	1	45.00%	2.5	_	167.10%	_	_
	2.5 to <5		_	-%	_	4.38%	1	45.00%	2.5	_	167.10%	_	_
	5 to <10		_	-%	_	-%		-%			-%		_
	10.00 to <100.00	1		-%	1	11.12%	1	45.00%	2.5	3	271.83%		_
	10 to <20	1		-%	1	11.12%	1	45.00%	2.5	3	271.83%	_	_
	20 to <30		_	-%	_	-%	_	-%		_	-%		_
	30.00 to <100.00		_	-%	_	-%	_	-%			-%		_
	100.00 (Default)		_	_% _%	_	-%	_	_% _%	_		-%	_	_
Subtotal (e	exposure class)	6,895			6,913	0.10%	166	21.28%	2.5	1,424	20.60%		(1)
Subtotal (c	Aposure classy	0,033	210	0.5570	0,515	0.1070	100	21.2070	2.3	1,121	20.0070	_	(2)
Corporates - SME without own estimates													
	0.00 to <0.15		7	8.27%	1	0.14%	3	45.00%	2.5	_	37.97%	_	_
	0.00 to <0.10	_	2	-%	_	-%	1	-%	_	_	-%	_	_
	0.10 to <0.15	_	5	11.45%	1	0.14%	2	45.00%	2.5	_	37.97%		_
	0.15 to <0.25	_	_	-%	_	-%	1	-%	_	_	-%		_
	0.25 to <0.50	12			18	0.32%	28	45.00%	2.5	16	87.23%	_	_
	0.50 to <0.75	38			45	0.58%	15	45.00%	2.5	52	115.68%	_	_
	0.75 to <2.50	958	484	15.88%	1,035	1.73%	1,983	45.00%	2.5	837	80.86%	9	(10)
	0.75 to <1.75	332	184	15.31%	360	1.18%	735	45.00%	2.5	266	73.78%	2	(1)
	1.75 to <2.5	626	300	16.23%	675	2.03%	1,248	45.00%	2.5	571	84.64%	7	(9)
	2.50 to <10.00	538	129	23.85%	569	4.71%	759	44.99%	2.5	618	108.59%	13	(31)
	2.5 to <5	286		23.68%	307	3.47%	463	44.98%	2.5	306	99.94%	5	(14)
	5 to <10	252	42		262	6.17%	296	45.00%	2.5	311	118.72%	_	, ,
	10.00 to <100.00	265	28	21.84%	271	18.73%	216	43.42%	2.5	455	167.94%	23	(34)
	10 to <20	209	19	20.94%	213	13.27%	142	42.99%	2.5	352	165.50%	13	(23)
	20 to <30	35	3	28.37%	36	28.90%	34	45.00%	2.5	66	184.70%	5	(5)
	30.00 to <100.00	22	5	21.05%	23	53.95%	40	45.00%	2.5	37	164.32%	6	(6)
	100.00 (Default)	107	15	13.78%	109	100.00%	189	45.00%	2.5	_	-%	49	(31)

Subtotal (e	exposure class)	1,919	702	18.36%	2,048	10.02%	3,194	44.79%	2.5	1,978	96.58%	94	(107)
Corporates - Specialised Lending without own estimates	,				-							-	,
	0.00 to <0.15	223	176	78.58%	362	0.10%	9		2.5	126	34.72%	_	(1)
	0.00 to <0.10	_	_	-%	-	-%	_	-%	_	_	-%	_	
	0.10 to <0.15	223	176	78.58%	362	0.10%	9	46.49%	2.5	126	34.72%	_	(1)
	0.15 to <0.25	532	201	76.59%	686	0.20%	18	45.00%	2.5	336	48.98%	1	(2)
	0.25 to <0.50	2,235	287	72.52%	2,443	0.34%	58	48.02%	2.5	1,653	67.64%	4	(8)
	0.50 to <0.75	1,033	298	77.18%	1,264	0.57%	29	50.41%	2.5	1,193	94.39%	4	(6)
	0.75 to <2.50	591	113	78.37%	680	0.93%	17	49.15%	2.5	732	107.71%	3	(4)
	0.75 to <1.75	573	113	78.37%	662	0.90%	16	49.26%	2.5	704	106.34%	3	(4)
	1.75 to <2.5	18	_	-%	18	2.25%	1	45.00%	2.5	28	158.79%	_	(1)
	2.50 to <10.00	74	3	75.00%	76	5.00%	2	45.00%	2.5	144	188.57%	2	(2)
	2.5 to <5	_	_	-%	_	-%	_	-%	_	_	-%	_	_
	5 to <10	74	3	75.00%	76	5.00%	2	45.00%	2.5	144	188.57%	2	(2)
	10.00 to <100.00	_	_	-%	_	-%	_	-%	_	_	-%	_	_
	10 to <20	_	-	-%	-	-%	_	-%	-	_	-%	_	_
	20 to <30	_	-	-%	-	-%	_	-%	_	_	-%	_	_
	30.00 to <100.00	_	-	-%	-	-%	_	-%	_	_	-%	_	_
	100.00 (Default)	-	-	-%	-	-%	_	-%	-	_	-%	_	_
Subtotal (e	xposure class)	4,689	1,078	76.18%	5,510	0.50%	133	48.19%	2.5	4,183	75.91%	15	(24)
Corporates - Other without own estimates													
	0.00 to <0.15	1,026	1,472	60.00%	1,909	0.08%	105	44.81%	2.5	733	38.38%	1	(1)
	0.00 to <0.10	477	534	65.63%	828	0.04%	35	44.56%	2.5	234	28.30%	_	_
	0.10 to <0.15	549	938	56.80%	1,082	0.11%	70	45.00%	2.5	499	46.09%	1	(1)
	0.15 to <0.25	497	165	57.04%	591	0.18%	33	42.56%	2.5	403	68.14%	1	(1)
	0.25 to <0.50	2,128	988	66.14%	2,782	0.37%	141	45.41%	2.5	2,286	82.20%	5	(9)
	0.50 to <0.75	1,786	683	59.31%	2,191	0.64%	121	44.63%	2.5	2,185	99.74%	7	(16)
	0.75 to <2.50	2,044	710	59.60%	2,468	1.19%	244	47.66%	2.5	2,927	118.61%	15	(28)
	0.75 to <1.75	1,791	644	62.52%	2,193	1.08%	165	48.04%	2.5	2,574	117.38%	12	(12)
	1.75 to <2.5	254	66	31.18%	274	2.07%	79	44.64%	2.5	352	128.42%	3	(15)
	2.50 to <10.00	1,097	359	59.64%	1,310	3.61%	125	43.55%	2.5	1,792	136.78%	22	(18)
	2.5 to <5	942	335	61.95%	1,150	3.24%	87	43.35%	2.5	1,529	132.93%	18	(11)
	5 to <10	154	23	26.59%	161	6.24%	38	45.00%	2.5	264	164.39%	5	(7)
	10.00 to <100.00	130	157	15.12%	153	26.33%	29	45.00%	2.5	366	238.79%	18	(23)
	10 to <20	34	19	35.00%	41	14.37%	20	45.00%	2.5	96	235.42%	3	(6)
	20 to <30	35	_	72.73%	35	25.17%	5	45.00%	2.5	67	191.37%	4	(5)
	30.00 to <100.00	61	137	12.22%	77	33.15%	4	45.00%	2.5	203	262.05%	12	(11)
	100.00 (Default)	51	6	53.42%	54	100.00%	29	45.00%	2.5	_	0.00%	24	(31)
Subtotal (e	xposure class)	8,759	4,539	59.48%	11,458	1.73%	827	45.28%	2.5	10,692	93.31%	94	(128)
Total (all exposure		22,261	6,538	56.11%	25,930	1.69%	4,320	39.46%	2.5		70.49%	204	(260)

### 45: Template EU CR6-A – Scope of the use of IRB and SA approaches

As per Article 452, point (b) the template below presents for each exposure class referred to in Article 147, the percentage of the total exposure value subject to the standardised approach (SA) and to the IRB approach, as well as the part of each exposure class subject to a roll-out plan. The template discloses the exposure value of IRB exposures in accordance with Article 166 CRR and, in order to provide an exposure measure valid for both SA exposures and IRB exposures, the aggregate exposure value of IRB and SA exposures uses the leverage ratio exposure methodology.

The PPU movement meant that IRB Central governments, public sector entities and regional governments moved to standardised, making these asset classes have a 100% exposure value approach to standardised.

Note that a revised IRB roll-out plan was approved by the AIB Board and submitted to the ECB in December 2022, and some further revisions are currently under review. Reporting on the basis of the revised roll-out plan and associated permanent partial use exemptions will take effect once the roll-out plan has been approved by the ECB.

		Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to permanent partial use of SA (%)	Percentage of total exposure value subject to IRB approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
		а	b	С	d	e
1	Central governments or central banks	l	43,636	100.00%	_	_
1.1	Of which Regional governments or local authorities		1,049	100.00%	_	_
1.2	Of which Public sector entities		679	100.00%	_	-
2	Institutions	6,914	8,079	13.28%	85.95%	0.77%
3	Corporates	19,017	32,604	7.56%	54.33%	38.11%
3.1	Of which Corporates - Specialised lending, excluding slotting approach		5,238	-	100.00%	_
3.2	Of which Corporates - Specialised lending under slotting approach		_	-	_	_
4	Retail	19,919	43,080	0.00%	45.98%	54.02%
4.1	of which Retail – Secured by real estate SMEs		61	0.00%	_	100.00%
4.2	of which Retail – Secured by real estate non-SMEs		37,288	0.00%	53.12%	46.88%
4.3	of which Retail – Qualifying revolving		1,584	0.02%	-	99.98%
4.4	of which Retail – Other SMEs		1,621	0.03%	-	99.97%
4.5	of which Retail – Other non-SMEs		2,525	0.02%	_	99.98%
5	Equity	_	491	100.00%	_	_
6	Other non-credit obligation assets	8	1,913	99.45%	0.42%	0.13%
7	Total	45,858	129,803	38.19%	34.26%	27.55%

# 46: Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

As per Article 453 point (j) the template below illustrates the effect of credit derivatives on the IRB approach capital requirements calculations. The template excludes securitisation exposures, counterparty credit risk and Non-credit obligation assets.

The Group has not used credit derivatives as a credit risk mitigant for exposures rated under the IRB approach.

		Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
		а	b
1	Exposures under F-IRB	18,277	18,277
2	Central governments and central banks	_	_
3	Institutions	1,424	1,424
4	Corporates	16,853	16,853
4.1	of which Corporates - SMEs	1,978	1,978
4.2	of which Corporates - Specialised lending	4,183	4,183
5	Exposures under A-IRB	6,431	6,431
6	Central governments and central banks	_	_
7	Institutions	_	_
8	Corporates	_	_
8.1	of which Corporates - SMEs	_	_
8.2	of which Corporates - Specialised lending	_	_
9	Retail	6,431	6,431
9.1	of which Retail – SMEs - Secured by immovable property collateral	_	_
9.2	of which Retail – non-SMEs - Secured by immovable property collateral	6,431	6,431
9.3	of which Retail – Qualifying revolving	_	_
9.4	of which Retail – SMEs - Other	_	_
9.5	of which Retail – Non-SMEs- Other	_	
10	TOTAL (including F-IRB exposures and A-IRB exposures)	24,708	24,708

### 47: Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

As per Article 453 point (g), this template discloses more granular information on the type of CRM techniques that the AIB Group applies.

		Total exposures					Credit ris	k Mitigation te	echniques					Credit risk methods in th of RV	
		exposures				Funded	credit Protecti	on (FCP)					ed credit on (UFCP)		RWEA with
	A-IRB		Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)	RWEA without substitution effects (reduction effects only)	substitution effects (both reduction and substitution effects)
		a	b	С	d	e	f	g	h	i	j	k	ı	m	n
1	Central governments and central banks	_	_	_	_	_	_	_	_	_	_	_	_	_	_
2	Institutions	_	_	_	_		_	_	_	_	_	_	_	_	_
3	Corporates	_	_	_	_	_	_	_	_	_	_	_	_	_	_
3.1	Of which Corporates – SMEs	_	_	_	_	_	_	_	_	_	_	_	_	-	_
3.2	Of which Corporates – Specialised lending	_	_	_	_	_	_	_	_	_	_	_	_	_	_
3.3	Of which Corporates – Other	_	_	_	-	_	_	_	_	_	_	_	_	_	_
4	Retail	19,919	_	99.26%	99.26%	_	_	_	_	_	-	-	_	6,431	6,431
4.1	Of which Retail – Immovable property SMEs	_	_	_	_	_	_	_	_	_	_	_	_	_	_
4.2	Of which Retail – Immovable property non-SMEs	19,919	_	99.26%	99.26%	_	_	_	_	_	_	_	_	6,431	6,431
4.3	Of which Retail – Qualifying revolving	_	_	_	-	_	-	-	-	-	-	-	-	_	_
4.4	Of which Retail – Other SMEs	_	_	_	-	_	_	_	-	_	-	-	_	_	_
4.5	Of which Retail – Other non-SMEs	_	_	_	-	_	_	_	-	_	-	-	_	_	_
5	Total	19,919	_	99.26%	99.26%	_	_	_	_	_	_	_	_	6,431	6,431

				Credit risk Mitigation techniques									Credit risk Mitigation methods in the calculation of RWEAs		
		Total exposures		Funded credit Protection (FCP) Unfunded credit Protection (UFCP)							RWEA	RWEA with			
F-IRB		CAPOSUICS	Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)	without substitution effects (reduction effects only)	effects (both reduction and substitution effects)
		a	b	С	d	e	f	g	h	i	j	k	ı	m	n
1	Central governments and central banks	_	_	_	_	_	_		_	_	_	_	_		_
2	Institutions	6,913	_	_	_	_	_		_	_	_	3.87%	_	1,424	
3	Corporates	19,017	_	4.96%	4.96%	_	_		_	_	_	0.70%	_	16,853	16,853
3.1	Of which Corporates - SMEs	2,048	_	2.20%	2.20%	_	_		_	_	_	5.97%	_	1,978	1,978
3.2	Of which Corporates – Specialised lending	5,510	1	_	_	-	_		-	-	_	1	_	4,183	4,183
3.3	Of which Corporates – Other	11,458	-	7.84%	7.84%	_	_		_	_	_	0.10%	_	10,692	10,692
4	Total	25,930	_	3.64%	3.64%	_	_		-	_	_	1.55%	_	18,277	18,277

### 48: Template EU CR8 - RWEA flow statements of credit risk exposures under the IRB approach

As per Article 438 point (h) the template below analyses the movements in risk weighted exposure amounts under the IRB approach within the period. This template excludes CRR of € 0.6 bn (September 2024: € 0.7 bn).

Main movements between September to December 2024 are as follows:

- Asset size increase driven primarily by new lending, offset partly by redemptions.
  Asset quality impact during the quarter was mainly driven by grade migration within the corporate portfolios.
  Model updates mainly relate to the corporate model offset by an increased number of customers moving onto the Mid/Large Model.
- Methodology and policy updates relate to the implementation of the Sovereign PPU and the SRT, partly offset by the move of UK Climate Capital loans from \*\* Foreign exchange movement increased due to USD strengthening against the EUR.

			Risk weighted ex	xposure amount	
		a	b	С	d
		31/12/2024	30/09/2024	30/06/2024	31/03/2024
1	Risk weighted exposure amount as at the end of the previous reporting period	24,291	23,718	24,534	23,797
2	Asset size (+/-)	505	551	(984)	452
3	Asset quality (+/-)	(39)	(23)	28	10
4	Model updates (+/-)	(91)	164	79	175
5	Methodology and policy (+/-)	(242)	_	_	_
6	Acquisitions and disposals (+/-)	-	_	_	_
7	Foreign exchange movements (+/-)	288	(119)	62	100
8	Other (+/-)	_	_	_	_
9	Risk weighted exposure amount as at the end of the reporting period	24,713	24,291	23,718	24,534

### 49: Template EU CR9 - IRB approach - Back-testing of PD per exposure class (fixed PD scale)

As per Article 452(h) of the CRR, the template below provides back-testing data to validate the reliability of PD calculations. The A-IRB exposures are rated by two PD models, an application mortgage model for first 3 months on books and an ongoing mortgage model for the remaining term. For these models, as they are retail, the back-testing is shown at facility level as the calibration is at facility level. For the other non-retail models, the back-testing is shown at an obligor level. For Corporates - SME, 91% of the exposures are rated on a SME model and 9% on a general Corporate model. For Corporates - Other, 89% of exposures are rated on a general Corporate model and 11% are rated on a SME model. For Corporates - Specialised Lending, all exposures are rated on a Project Finance model. This template covers the € 24.6 bn of RWEA rated by the IRB models at the end of 2023 excluding the Sovereign IRB model which reverted to the Standardised Approach in 2024. The average historical annual default rate is calculated using 5 years of non-overlapping data. With respect to short term contracts, these only materially feature in the Corporates-Other portfolio where 3% of borrowers have only short term contracts.

### A-IRB

Exposure class	PD range	Number of oblig of the previous	year of which: number of obligors which defaulted in	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	С	the year	e	f	g	h
Retail -	0.00 to <0.15	33,293	22	0.07 %	· ·	0.07 %	
Secured by	0.00 to <0.10	33,293	22	0.07 %	0.07 %	0.07 %	0.17 %
immovable property	0.10 to <0.15	55,255			3.3.7.		
proporty	0.15 to <0.25	58,533	63	0.11 %	0.19 %	0.19 %	0.38 %
	0.25 to <0.50	4,471	8	0.18 %	0.39 %	0.39 %	0.20 %
	0.50 to <0.75	10,684	28	0.26 %	0.53 %	0.53 %	0.33 %
	0.75 to <2.50	25,016	79	0.32 %	1.78 %	1.75 %	0.99 %
	0.75 to <1.75	11,977	24	0.20 %	1.08 %	1.07 %	0.85 %
	1.75 to <2.50	13,039	55	0.42 %	2.39 %	2.37 %	0.67 %
	2.50 to <10.00	5,434	126	2.32 %	6.06 %	6.03 %	5.67 %
	2.50 to <5.00	940	4	0.43 %	3.69 %	3.70 %	3.87 %
	5.00 to <10.00	4,494	122	2.71 %	6.40 %	6.52 %	8.32 %
	10.00 to <100.00	2,564	366	14.27 %	21.68 %	21.61 %	18.08 %
	10.00 to <20.00	1,842	188	10.21 %	16.96 %	16.89 %	9.74 %
	20.00 to <30.00	476	111	23.32 %	26.31 %	26.26 %	21.19 %
	30.00 to <100.00	246	67	27.24 %	48.73 %	47.90 %	22.66 %
	100.00 (Default)	2,597			100.00 %	100.00 %	

### F-IRB

		Number of obligors at the end of the previous year		Observed			Avorago
Exposure class	PD range		of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	С	d	е	f	g	h

Institutions	0.00 to <0.15	129	0	0.00 %	0.09 %	0.10 %	0.00 %
	0.00 to <0.10	34	0	0.00 %	0.04 %	0.04 %	0.00 %
	0.10 to <0.15	95	0	0.00 %	0.12 %	0.12 %	0.00 %
	0.15 to <0.25						
	0.25 to <0.50	24	0	0.00 %	0.35 %	0.35 %	0.00 %
	0.50 to <0.75						
	0.75 to <2.50	4	0	0.00 %	0.99 %	0.99 %	0.00 %
	0.75 to <1.75	4	0	0.00 %	0.99 %	0.99 %	0.00 %
	1.75 to <2.50						
	2.50 to <10.00	1	0	0.00 %	4.38 %	4.38 %	0.00 %
	2.50 to <5.00	1	0	0.00 %	4.38 %	4.38 %	0.00 %
	5.00 to <10.00						
	10.00 to <100.00	1	0	0.00 %	11.12 %	11.12 %	0.00 %
	10.00 to <20.00	1	0	0.00 %	11.12 %	11.12 %	0.00 %
	20.00 to <30.00						
	30.00 to <100.00						
	100.00 (Default)						

		Number of oblig of the previous	,	Observed			<b>A</b>
Exposure class	PD range		of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
a	b	С	d	е	f	g	h
Corporates -	0.00 to <0.15	5	0	0.00 %	0.10 %	0.07 %	0.00 %
SME	0.00 to <0.10	2	0	0.00 %	0.00 %	0.03 %	0.00 %
	0.10 to <0.15	3	0	0.00 %	0.10 %	0.10 %	0.00 %
	0.15 to <0.25	2	0	0.00 %	0.18 %	0.18 %	0.00 %
	0.25 to <0.50	19	0	0.00 %	0.32 %	0.32 %	0.00 %
	0.50 to <0.75	11	0	0.00 %	0.58 %	0.58 %	0.00 %
	0.75 to <2.50	1,527	13	0.85 %	1.28 %	1.47 %	1.30 %
	0.75 to <1.75	883	5	0.57 %	0.99 %	1.07 %	0.87 %
	1.75 to <2.50	644	8	1.24 %	2.02 %	2.02 %	1.86 %
	2.50 to <10.00	998	24	2.40 %	4.38 %	4.46 %	5.97 %
	2.50 to <5.00	562	4	0.71 %	3.27 %	3.27 %	2.87 %
	5.00 to <10.00	436	20	4.59 %	6.21 %	6.00 %	9.13 %
	10.00 to <100.00	36	3	8.33 %	15.42 %	17.12 %	21.42 %
	10.00 to <20.00	28	3	10.71 %	13.75 %	13.75 %	19.17 %
	20.00 to <30.00	6	0	0.00 %	22.20 %	22.20 %	24.34 %
	30.00 to <100.00	2	0	0.00 %	36.87 %	49.05 %	27.23 %
	100.00 (Default)	219			100.00 %	100.00 %	

		Number of oblig of the previous	•	Observed			Average
Exposure class	PD range		of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	historical annual default rate (%)
a	b	С	d	е	f	g	h

Corporates -	0.00 to <0.15	2	0	0.00 %	0.10 %	0.10 %	0.00 %
Specialised Lending	0.00 to <0.10						
	0.10 to <0.15	2	0	0.00 %	0.10 %	0.10 %	0.00 %
	0.15 to <0.25	11	0	0.00 %	0.20 %	0.20 %	0.00 %
	0.25 to <0.50	38	0	0.00 %	0.34 %	0.34 %	0.00 %
	0.50 to <0.75	25	0	0.00 %	0.58 %	0.58 %	0.00 %
	0.75 to <2.50	9	0	0.00 %	0.84 %	0.88 %	0.00 %
	0.75 to <1.75	9	0	0.00 %	0.84 %	0.88 %	0.00 %
	1.75 to <2.50						
	2.50 to <10.00	1	0	0.00 %	2.75 %	2.75 %	0.00 %
	2.50 to <5.00	1	0	0.00 %	2.75 %	2.75 %	0.00 %
	5.00 to <10.00						
	10.00 to <100.00	3	0	0.00 %	50.00 %	50.00 %	25.00 %
	10.00 to <20.00						
	20.00 to <30.00						
	30.00 to <100.00	3	0	0.00 %	50.00 %	50.00 %	0.00 %
	100.00 (Default)				100.00 %	100.00 %	

		Number of oblig of the previous	•	Observed			Average	
Exposure class	PD range		of which: number of obligors which defaulted in the year	average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	historical annual default rate (%)	
a	b	С	d	е	f	g	h	
Corporates -	0.00 to <0.15	126	0	0.00 %	0.07 %	0.08 %	0.00 %	
Other	0.00 to <0.10	50	0	0.00 %	0.04 %	0.04 %	0.00 %	
	0.10 to <0.15	76	0	0.00 %	0.10 %	0.10 %	0.00 %	
	0.15 to <0.25	58	0	0.00 %	0.18 %	0.18 %	0.37 %	
	0.25 to <0.50	196	0	0.00 %	0.32 %	0.32 %	0.36 %	
	0.50 to <0.75	115	2	1.74 %	0.58 %	0.58 %	0.80 %	
	0.75 to <2.50	244	2	0.82 %	1.25 %	1.23 %	2.00 %	
	0.75 to <1.75	190	1	0.53 %	1.03 %	1.02 %	0.97 %	
	1.75 to <2.50	54	1	1.85 %	1.91 %	1.98 %	5.58 %	
	2.50 to <10.00	106	0	0.00 %	4.00 %	4.92 %	7.70 %	
	2.50 to <5.00	38	0	0.00 %	3.33 %	3.29 %	3.68 %	
	5.00 to <10.00	68	0	0.00 %	6.63 %	5.83 %	10.06 %	
	10.00 to <100.00	7	0	0.00 %	19.61 %	20.91 %	11.27 %	
	10.00 to <20.00	6	0	0.00 %	19.17 %	18.42 %	9.52 %	
	20.00 to <30.00							
	30.00 to <100.00	1	0	0.00 %	35.84 %	35.84 %	13.54 %	
	100.00 (Default)	43			100.00 %	100.00 %		

# 50: Template EU CR9.1 – IRB approach – Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)

As per Article 452(h) of the CRR the table below provides back testing data to validate the reliability of PD calculations. These tables are completed for all portfolios where there is a mapping to External ratings as per CRR Article 180(1)(f).

The historical average observed default rate is calculated using 5 years of non-overlapping data.

### F-IRB

					Number of obli of the previous	-	Observed		Average
Exposure class	PD range	Exte	rnal rating equiv	alent		of which: number of obligors which defaulted in the year	average default rate (%)	Average PD (%)	historical annual default rate (%)
а	b		С		d	е	f	g	h
		S&P	Fitch	Moody's					
Institutions	0.04%	AAA to AA-	AAA to AA-	Aaa to Aa3	34	0	0.00%	0.04%	0.00%
	0.12%	A+ to A-	A+ to A-	A1 to A3	95	0	0.00%	0.12%	0.00%
	0.35%	BBB+ to BBB-	BBB+ to BBB-	Baa1 to Baa3	24	0	0.00%	0.35%	0.00%
	0.99%	BB+ to BB-	BB+ to BB-	Ba1 to Ba3	4	0	0.00%	0.99%	0.00%
	1.48%	B+	B+	B1					
	2.32%	В	В	B2			·		
	4.38%	B-	B-	В3	1	0	0.00%	4.38%	0.00%
	11.12%	CCC+ to CCC-	CCC+ to CCC-	Caa1 to Caa3	1	0	0.00%	11.12%	0.00%

Chapter 12. Disclosure of exposures to counterparty credit risk

## 51: Table EU CCRA – Qualitative disclosure related to CCR

As per Article 439 the table below provides information on the Group's counterparty credit risk management.

Legal basis	Row Number		Qualitative information
Article 439 (a)	(a)	Description of the methodology used to assign internal capital and credit limits	The Group is predominantly exposed to counterparty credit exposure through its portfolio of derivatives and repurchase agreements ('repos').  Derivatives: The credit risk on derivative contracts is the risk that the Group's counterparty in the
		for counterparty credit exposures, including the methods to	contract defaults prior to maturity at a time when AIB has a claim on the counterparty under the contract. AIB would then have to replace the contract at the current market rate, which may result in a loss.
		assign those limits to exposures to central	The credit exposure on derivatives is managed in the same way as other types of credit exposure. The Group applies the same credit control and risk management policies as relate to counterparty credit approval, limit setting and monitoring procedures.
		counterparties	Counterparty credit exposure ("CCE") consists partly of current replacement cost (or mark-to-market) of the contracts and partly of potential future exposure. The potential future exposure component is an estimation which reflects possible changes in market values during the remaining life of the individual contract. The CCE for an individual counterparty will take into account the existence of valid bilateral netting or collateral agreements, where these are in place.
			The Group applies the Standardised approach for counterparty credit risk (SA-CCR) for calculating the Pillar 1 capital for derivatives.
			Pre-settlement CCE limits must be approved in advance of any transactions being entered into by the appropriate credit approval authority. This forms part of the normal credit management and review process. Settlement and maturity limits must conform to general credit policy requirements. Limits on the maximum residual maturity of derivative activities are governed by individual counterparty maturity constraints.
			Those sanctioning CCE limits must be satisfied that they sufficiently understand the risks involved in the proposed transactions. It is Group practice, where possible and relevant, that all appropriate documentation, such as facility letters or international swaps and derivatives association ("ISDA") agreements be put in place before any limits are made available for use.
			For repos, reverse repos, collateral swaps and securities lending transactions, CCE is measured as the sum of current replacement cost plus an additional amount to reflect potential future losses that might be incurred due to adverse market movements that can occur in the time taken to replace a position. This additional amount is calculated by using an add-on-factor (AOF) approach. AOFs increase as the 'riskiness' of the underlying collateral increases. AOFs are derived by applying conservative overlays to the volatility-adjustments specified in article 224 of CRR IV. Pre-settlement CCE limits for derivative transactions are established by reference to the specific transaction's add-on-factors equivalent.
			Credit Support Annexes ("CSAs") are taken into consideration when setting the internal credit risk utilisation for derivative counterparties. CSAs and netting are also recognised as credit risk mitigation for reducing the exposure at default on derivatives. Regulatory netting is currently recognised for 12 bank counterparties. GMRAs/PSAs and netting are not recognised as credit risk mitigation for repo transactions in the pillar 1 regulatory capital calculations.
			The Group has established the capacity to clear derivatives in line with European Markets Infrastructure Regulation ("EMIR") requirements for central counterparty clearing. Clearing of certain derivative transactions is now mandatory for AIB under Article 4 of EMIR (clearing obligation). The clearing obligation requires AIB to clear certain derivatives with an authorised central clearing party (termed a 'CCP'; AIB uses LCH SwapClear, Eurex, LCH (SA) for CDS) which is completed through a 'Clearing Broker'; AIB's clearing brokers are HSBC France , BNP and Barclays Bank Ireland. Cleared derivatives eliminate exposure to bilateral counterparties, replacing these counterparties with the CCP.
			Repurchase agreements: AIB Group is active in repurchase transactions in capital market instruments. This is achieved through repo/reverse repo products (together called repurchase transactions). Repurchase transactions are undertaken on both a bilateral and tri-party basis.
			Where appropriate netting documentation is in place, both sets of products also become legally equivalent from a credit mitigation perspective. The Group only engages in such transactions once the appropriate documentation has been executed. The transactions are executed by authorised personnel in the treasury function.
			An independent middle office function in the finance department has responsibility for managing the margining of the Group's bilateral repo/reverse repo activities. Margining has been predominantly cash-based although the documentation in general allows for securities to be used as collateral. Tri-party margining is managed through Euroclear, JP Morgan Luxembourg S.A. and Bank of New York SA/NV Tri-party and custodian agents. The associated credit risk is managed in the same way as other types of credit exposure. Exposures are calculated to take account of historical price volatility reflecting the maturity of both the collateral and repurchase transaction. The exposures are aggregated with all other exposures to the counterparty.

			In addition to the normal credit control and risk management policies relating to counterparty credit approval, limit setting and monitoring procedures, the following credit criteria receive additional focus for repurchase transactions:  • Acceptable collateral; • Acceptable counterparties; • Appropriate nominal exposure limits by counterparty; • Appropriate risk weighted exposure limits by counterparty; and • Haircut amounts (where appropriate).  AIB applies the financial collateral comprehensive method for the purposes of calculating Pillar 1 capital for counterparty credit exposure for repurchase type transactions.
Article 439 (b)	(b)	Description of policies related to guarantees and other credit risk mitigants, such as the policies for	It is Group practice, where possible and relevant, that ISDA Master Agreements are put in place to cover derivatives business on a counterparty specific basis. It is also Group practice in relation to wholesale market counterparts to supplement ISDA documentation with a CSA to accommodate the reduction of net exposure on an agreed basis, and in line with market practice, by way of transferring a margin amount, typically cash (as opposed to securities).  AIB employs robust procedures and processes to control the residual risk that may arise
		securing collateral and establishing credit reserves	when taking financial collateral, including strategy, consideration of the underlying credit and collateral management/valuation process. In addition, the Group has established standards to ensure legal certainty exists and the degree of correlation between the credit quality of the obligor and the collateral value must be considered and mitigated.
Article 439 (c)	(c)	Description of policies with respect to Wrong-Way risk as defined in Article 291 of the CRR	AIB's measurement of counterparty credit risk exposure against limits for foreign exchange, interest rate, inflation and equity derivatives does not include a consideration for wrong way risk. Wrong way risk is unlikely to be a feature of such transactions. AIB's measurement of counterparty credit exposure against limits for reverse repurchase agreements and for collateral swaps requires that consideration be given to the correlation between collateral value and the counterparty default probability when determining the add on factor.
Article 439 (d)	(d)	Any other risk management objectives and relevant policies related to CCR	As above, see Article 439 (b).
Article 439 (e)	(e)	The amount of collateral the institution would have to provide if its credit rating was downgraded	A downgrade in the Group's credit rating could have the effect of triggering a CSA to come into effect for a cohort of ISDAs with corporate clients which contractually have this feature should the Group be downgraded below a contractually specified level. However, due to the small number of ISDAs with this feature, this is not deemed a significant risk for the Group. In addition, a downgrade in the Group's credit rating could lead to an increase in the haircuts that would be demanded by counterparties in repurchase transactions. This would lead to an increase in the quantum of securities being pledged by the Group as collateral. The mark-to-market on these trades at 31 December 2024 was approximately €61m.

## 52: Template EU CCR1 - Analysis of CCR exposure by approach

As per Article 439, points (f), (g), (k) and (m) the template below sets out the methods used to calculate CCR regulatory requirements and the resultant RWEAs. Article 439(m) is an annual requirement on disclosure of the size of on and off-balance sheet derivatives. As at 31 December 2024 this was € 3.9 bn.

Decrease in RWEA between June to December 2024 is mainly due to a decrease in Securities Financing Transaction 'SFT' RWEA, partially offset by an increase in Derivative RWEA, due to increased replacement cost.

		a	b	С	d	е	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre- CRM	Exposure value post- CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)	_	_		1.4	ı	l	1	_
EU2	EU - Simplified SA-CCR (for derivatives)	_	1		1.4	I	l	l	_
1	SA-CCR (for derivatives)	125	189		1.4	822	441	436	331
2	IMM (for derivatives and SFTs)			-	_	-		-	_
2a	Of which securities financing transactions netting sets			-		-		1	_
2b	Of which derivatives and long settlement transactions netting sets					_			_
2c	Of which from contractual cross-product netting sets			_		_	_	-	_
3	Financial collateral simple method (for SFTs)					_	_		_
4	Financial collateral comprehensive method (for SFTs)					11,172	11,233	11,233	416
5	VaR for SFTs						-		_
6	Total					11,994	11,674	11,669	747

## 53: Template EU CCR2 – Transactions subject to own funds requirements for CVA risk

As per Article 439 point (h) the template below presents the CVA charge broken down by approach.

Increase in RWEA between June to December 2024 primarily due to increased exposure at default.

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method <sup>1</sup>		
2	(i) VaR component (including the 3× multiplier) <sup>1</sup>		
3	(ii) stressed VaR component (including the 3× multiplier) <sup>1</sup>		
4	Transactions subject to the Standardised method	189	58
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method) <sup>1</sup>		
5	Total transactions subject to own funds requirements for CVA risk	189	58

<sup>&</sup>lt;sup>1</sup>AIB does not use Advanced method or Alternative approach

### 54: Template EU CCR3 - Standardised approach - CCR exposures by regulatory exposure class and risk weights

As per Article 439 point (I), which refers to point (e) of Article 444, the template below presents a breakdown of CCR by exposure class and risk weight. The main movements between June to December 2024 are as follows:

• A decrease in volume of activity with Qualifying Central Counterparty 'QCCPs'.

• A decrease in replacement cost values with corporates and institutions.

							Risk	weight					
		а	b	С	d	е	f	g	h	i	j	k	I
	Exposure classes		2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total exposure value
1	Central governments or central banks		-	1	ı	1	ı	-		_	_	_	-
2	Regional government or local authorities	_	_		_			_	_	_	_	_	_
3	Public sector entities	_	_	_	_	_	-	_	_	_	_	_	_
4	Multilateral development banks	_	-	1	-	1	ı	-	-	-	_	_	-
5	International organisations	_	_	-	_	-	-	_	_	_	_	_	_
6	Institutions	_	2,155	_	_	_	_	_	_		_	_	2,155
7	Corporates	_	_	_	_	_	_	_	_	133	_	_	133
8	Retail	_	_	_	_	_	_	_	-	_	_	_	_
9	Institutions and corporates with a short-term credit assessment	_	_	_	_	_	_	_	_	_	_	_	_
10	Other items	_	_	_	_	_	_	_	_	_	_	_	_
11	Total exposure value	_	2,155	_	_	_	_	_	_	133	_	_	2,288

## 55: Template EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale

As per Article 439 point (I), which refers to point (g) of Article 452, the template below presents a detailed view of counterparty credit risk positions subject to the IRB approach by exposure class and PD scale.

Movements between June 2024 to December 2024 are as follows:

• Decreases in exposure values and RWEAs of institutions.

- Increases in exposure values and RWEAs of corporates.

		а	b	С	d	е	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
Central governments and central banks (F-IRB)								
1	0.00 to <0.15	_	_	_	_	_	_	_
2	0.15 to <0.25	-	_	_	_	_	_	_
3	0.25 to <0.50	_	_	_	_	_	_	_
4	0.50 to <0.75	_	_	_	_	_	_	_
5	0.75 to <2.50	-	_	_	_	_	_	_
6	2.50 to <10.00	_	_	_	_	_	_	_
7	10.00 to <100.00			_		_		_
8	100.00 (Default)	_	_	_	_	_	_	_
	Sub-total (Central governments and central banks)	_	_	_	_	_	_	_

	1	а	b	С	d	е	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
Institutions (F-IRB)								
1	0.00 to <0.15	11,098	0.12 %	50	6.88 %	1	490	4.42 %
2	0.15 to <0.25	_	_	_	_		_	_
3	0.25 to <0.50	310	0.35 %	2	3.50 %	1	14	4.46 %
4	0.50 to <0.75	_	_	_	_	_	_	_
5	0.75 to <2.50	_	_	_	_	_	_	_
6	2.50 to <10.00	_	-	_	_	-	_	-
7	10.00 to <100.00		l	ı	ı	l	ı	l
8	100.00 (Default)	_	_	_	_	_	_	_
	Sub-total (Institutions (F- IRB))	11,409	0.12 %	52	6.79 %	1	504	4.42 %

		а	b	С	d	е	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
Corporates (F-IRB) SME								
1	0.00 to <0.15	_	_	_	_	_	_	_
2	0.15 to <0.25	-	_	_	_	_	_	_
3	0.25 to <0.50	0	0.32 %	2	45.00 %	3	0	93.16 %
4	0.50 to <0.75	1	0.58 %	5	45.00 %	3	1	115.25 %
5	0.75 to <2.50	0	0.98 %	1	45.00 %	3	0	74.12 %
6	2.50 to <10.00	_	_	_	_	_	_	_
7	10.00 to <100.00	_	_	_		-	_	_
8	100.00 (Default)		_	_	_	_	_	_
	Sub-total (Corporates (F-IRB) SME)	1	0.56 %	8	45.00 %	3	1	110.11 %

		а	b	С	d	е	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
Corporates (F-IRB) Specialised Lending								
1	0.00 to <0.15	13	0.10 %	7	45.00 %	2	5	39.08 %
2	0.15 to <0.25	5	0.20 %	4	45.00 %	3	3	51.33 %
3	0.25 to <0.50	17	0.33 %	31	45.00 %	3	13	74.43 %
4	0.50 to <0.75	14	0.56 %	13	45.00 %	3	14	96.61 %
5	0.75 to <2.50	10	0.85 %	3	45.00 %	3	12	116.07 %
6	2.50 to <10.00	0	5.00 %	1	45.00 %	3	0	200.51 %
7	10.00 to <100.00	0	50.00 %	1	45.00 %	3	0	291.51 %
8	100.00 (Default)	_	-	_	1	1	-	_
	Sub-total (Corporates (F-IRB) Specialised Lending)	60	0.45 %	60	45.00 %	3	46	77.74 %

		а	b	С	d	е	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
Corporates (F-IRB) Other								
1	0.00 to <0.15	19	0.10 %	14	45.00 %	3	7	35.17 %
2	0.15 to <0.25	3	0.18 %	2	45.00 %	3	2	68.39 %
3	0.25 to <0.50	12	0.33 %	17	45.00 %	3	12	92.83 %
4	0.50 to <0.75	20	0.58 %	5	45.00 %	3	25	122.62 %
5	0.75 to <2.50	9	1.07 %	10	45.00 %	3	9	101.02 %
6	2.50 to <10.00	1	2.87 %	2	45.00 %	3	1	134.46 %
7	10.00 to <100.00	3	33.04 %	2	45.00 %	3	8	262.62 %
8	100.00 (Default)	_	_	-	_	_	_	_
	Sub-total (Corporates (F-IRB) Other)	68	1.95 %	52	45.00 %	2	63	93.50 %

		a	b	С	d	e	f	g
PD scale		Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
Retail (A-IRB)								
1	0.00 to <0.15	_	_	_	_	_	_	_
2	0.15 to <0.25	_	_	_	_	_	_	_
3	0.25 to <0.50	_	_	_	_	_	-	_
4	0.50 to <0.75	1	ı	_	_	-	ı	-
5	0.75 to <2.50	l	ı	l	-	l	l	l
6	2.50 to <10.00	1	-	-	_	ı	ı	1
7	10.00 to <100.00	_	-	_	_	-	-	1
8	100.00 (Default)		_	_	_			
	Sub-total (Retail (A-IRB))	_	_	_	_	_	_	_
	Total (all CCR relevant exposure classes)	11,537	0.14 %	172	7.21 %	1	615	5.33 %

### 56: Template EU CCR5 – Composition of collateral for CCR exposures

As per Article 439 point (e) the template below provides a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions and to SFTs, including transactions cleared through CCP ("Central Counterparty").

Changes in collateral between June to December 2024 is mainly due to changes in derivative market values and movements in SFT collateral values.

		a	b	С	d	e	f	g	h	
		Co	llateral used in de	rivative transaction	ons		Collateral u	ised in SFTs		
	Collateral type	Fair value of col	llateral received	Fair value of po	osted collateral	Fair value of col	lateral received	lateral received Fair value of pos		
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
1	Cash – domestic currency	744	5	79	62	_	_	_	_	
2	Cash – other currencies	65	_	151	0	ı	-	_	_	
3	Domestic sovereign debt	_	_	_	_	_	-	-	1,706	
4	Other sovereign debt	_	_	_	_	_	215	_	943	
5	Government agency debt	_	_	_	_	_	474	_	_	
6	Corporate bonds	_	_	1	1	1	2,689	1	78	
7	Equity securities	_	_	_			3,583	ı	_	
8	Other collateral	_	_	_		_	_		_	
9	Total	808	5	230	62	_	6,961	-	2,726	

## **57: Template EU CCR6 – Credit derivatives exposures**

As per Article 439 point (j) the template below sets out the AIB's exposure to credit derivative transactions analysed between derivatives bought or sold.

		a	b
		Protection bought	Protection sold
	Notionals		
1	Single-name credit default swaps	_	_
2	Index credit default swaps	83	_
3	Total return swaps	1	_
4	Credit options	_	_
5	Other credit derivatives	_	_
6	Total notionals	83	_
	Fair values		
7	Positive fair value (asset)	_	_
8	Negative fair value (liability)	(2)	_

## 58: Template EU CCR8 – Exposures to CCPs

As per Article 439 point (i) the template below sets out the Group's exposure to Qualifying Central Counterparty (QCCP). Decrease in RWEAs between June to December 2024 primarily due to reduction in replacement cost values with QCCPs.

		а	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		43
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	2,155	43
3	(i) OTC derivatives	2,155	43
4	(ii) Exchange-traded derivatives		
5	(iii) SFTs	1	
6	(iv) Netting sets where cross-product netting has been approved	_	
7	Segregated initial margin	l	
8	Non-segregated initial margin	1	
9	Prefunded default fund contributions	l	l
10	Unfunded default fund contributions	1	
11	Exposures to non-QCCPs (total)		
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	_	
13	(i) OTC derivatives	_	_
14	(ii) Exchange-traded derivatives		
15	(iii) SFTs		
16	(iv) Netting sets where cross-product netting has been approved	_	_
17	Segregated initial margin	_	
18	Non-segregated initial margin		
19	Prefunded default fund contributions	_	
20	Unfunded default fund contributions	_	

**Chapter 13. Disclosure of exposures to securitisation positions** 

## 59: Table EU SECA - Qualitative disclosure requirements related to securitisation exposures

As per Article 449, points (a) to (i) see table below:

Legal basis	Row number		Qualitative information								
Article 449(a) CRR	(a)	Description of securitisation and resecuritisation activities; including institutions' risk management and investment objectives in connection with those activities, their role in securitisation and re-securitisation transactions whether they use the Simple Transparent and Standardised (STS) securitisation framework and the extent to which they use securitisation transactions to transfer the credit risk of the securitised exposures to third parties with, where applicable, a separate description of their synthetic securitisation risk transfer policy	The Group is an originator of securitisations (retained) and Significant Risk Transfer (SRT) Securitisations, and an investor in securitisation. The Group is not currently a sponsor of any securitisation positions.  All investment securitisation positions are recorded in the Group plc's banking book, and are measured at fair value through Other Comprehensive Income (OCI) or Amortised Cost under the 'Investment Securities' classification in the financial statements.  Risk Management:  Originated SRT Transactions: AIB's "Significant Risk Transfer (SRT) - Risk Principles" sets out the Groups approach to securitisations which seek to achieve regulatory SRT, and outlines the key principles to be applied to the assessment and structuring of transactions which seek to achieve SRT (and in some instances STS also), the additional operational requirements and risk assessment required prior to execution of a transaction, the expectations for ongoing monitoring and review post execution, roles and responsibilities across the 3 lines of defence, and governance requirements which apply, including the risk review of the key items detailed above. This is supported by a SRT Operating Framework which articulates the over-arching end-to-end process for SRT, including setup, execution and ongoing management, and to ensure organisational alignment and adherence with transaction specific contractual terms and regulatory requirements, as well as Information Barriers.  Investment Portfolio: In accordance with its credit risk policy, the Group invests in traditional securitisations. There is a specific Securitisation Credit policy which outlines and governs the risk appetite of the bank from an investor perspective, and is aligned to Article 5 of the Regulation (EU) No 2017 / 2402. Origination and management of ABS securitisation investments can only be conducted by specified areas of AIB, which have the relevant skills and experience to manage the portfolio. Origination of ABS investments are approved by credit committees in line with								

	1		1,122 (1,114)
			AlB Group (UK) p.l.c. Pension Scheme interest in the AlB PFP Scottish Limited Partnership.  In December 2013, the Group agreed with the Trustee of the AlB UK Defined Benefit Pension Scheme ("the UK scheme") a restructure of the funding of the deficit in the UK scheme. The Group established a pension funding partnership, AlB PFP Scottish Limited Partnership ("SLP") under which a portfolio of loans was transferred to the SLP from another Group entity, AlB UK Loan Management Limited ("UKLM") for the purpose of ring-fencing the repayments on these loans and providing security in respect of future pension payments to the UK scheme. The LP structure is still in place, however we note that because there was sufficient cash in the SLP to provide the required security in respect of future payment obligations, all the ring-fenced loans were transferred from the SLP back to UKLM during 2023.
Article 449(b) CRR	(b)	The type of risk that institutions are exposed to in their securitisation and resecuritisation activities by level of seniority of the relevant securitisation positions, providing a distinction between STS and non-STS positions and:  i) risk retained in own-originated transactions;  ii) risk incurred in relation to transactions originated by third parties	Traditional Securitisations: The Group sold loans and advances to customers, mainly mortgages, to securitisation special purpose entities ("SSPEs"), which, in turn, issued notes or deposits to external investors. The notes or deposits issued by the SSPEs are on terms which resulted in the Group retaining the majority of ownership risks and rewards and therefore, the loans continue to be recognised on the Group's statement of financial position with all the notes being eliminated on consolidation. See point d for full list of SSPEs.
Article 449(c) CRR	(c)	Institutions' approaches to calculating the risk-weighted exposure amounts that they apply to their securitisation activities, including the types of securitisation positions to which each approach applies with a distinction between STS and non-STS positions	SRT Securitisations: the bank uses SRT securitisations to transfer the credit risk associated with a portfolio of loans to third party investors. Where the level of risk transferred is deemed significant a reduction in the regulatory capital requirements commensurate with the credit risk transferred, can be achieved.
Article 449(d)	(d)	A list of SSPEs falling into any of the	(i) In its role as an originator the Group has the following SSPE's:
CRR		following categories, with a description of their types of exposures to those SSPEs, including derivatives contracts:  (i) SSPEs which acquire exposures originated by the institutions;	a) Burlington Mortgages No. 1 d.a.c a residential mortgage loan portfolio comprising loans from 2 of its subsidiaries, EBS d.a.c. and Haven Mortgages Limited. In order to fund the acquired mortgages, Burlington issued twelve classes of notes to EBS d.a.c. and Haven in the same proportion as the mortgages securitised. These notes are retained by AIB Group.
		(ii) SSPEs sponsored by the institutions; (iii) SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services;	b) Burlington Mortgage No. 2 d.a.c – a residential mortgage loan portfolio comprising loans from 2 of its subsidiaries, EBS d.a.c. and Haven Mortgages Limited. In order to fund the acquired mortgages, Burlington issued seven classes of notes to EBS d.a.c. and Haven in the same proportion as the mortgages securitised. These notes are retained by AIB Group.
		(iv) SSPEs included in the institutions' regulatory scope of consolidation	c) AIB Group (UK) p.l.c. Pension Scheme interest in the AIB PFP Scottish Limited Partnership. In December 2013, the Group agreed with the Trustee of the AIB UK Defined Benefit Pension Scheme ("the UK scheme") a restructure of the funding of the deficit in the UK scheme. The Group established a pension funding partnership, AIB PFP Scottish Limited Partnership ("SLP") under which a portfolio of loans was transferred to the SLP from another Group entity, AIB UK Loan Management Limited ("UKLM") for the purpose of ring-fencing the repayments on these loans and providing security in respect of future pension payments to the UK scheme. The LP structure is still in place, however we note that because there was sufficient cash in the SLP to provide the required security in respect of future payment obligations, all the ring-fenced loans were transferred from the SLP back to UKLM during 2023.
			d) Setanta Finance 2024 DAC - SSPE set up to issue notes associated with the SRT securitisation programme.
			(ii) There are no SSPEs sponsored by the Group at this time.
			(iii) The Group provides securitisation related services to the third party entity Beara Finance d.a.c. These comprise of mortgage servicing and cash management services related to portfolio of residential mortgage loans held by Beara and the related Profit Participation Note issued by Beara.
			(iv) Burlington Mortgages No. 1 d.a.c., Burlington Mortgage No. 2 d.a.c and Setanta Finance 2024 DAC are the three SSPEs included in AIB Groups regulatory scope of consolidation.
	l	1	

Article 449(e ) CRR	(e)	A list of any legal entities in relation to which the institutions have disclosed that they have provided support in accordance with Chapter 5 of Title II of Part Three CRR	AIB Group (UK) p.l.c. Pension Scheme interest in the AIB PFP Scottish Limited Partnership.
Article 449(f) CRR	(f)	A list of legal entities affiliated with the institutions and that invest in securitisations originated by the institutions or in securitisation positions issued by SSPEs sponsored by the institutions	In December 2013, the Group agreed with the Trustee of the AIB UK Defined Benefit Pension Scheme ("the UK scheme") a restructure of the funding of the deficit in the UK scheme. The Group established a pension funding partnership, AIB PFP Scottish Limited Partnership ("SLP") under which a portfolio of loans was transferred to the SLP from another Group entity, AIB UK Loan Management Limited ("UKLM") for the purpose of ring-fencing the repayments on these loans and providing security in respect of future pension payments to the UK scheme. The LP structure is still in place, however we note that because there was sufficient cash in the SLP to provide the required security in respect of future payment obligations, all the ring-fenced loans were transferred from the SLP back to UKLM during 2023.
Article 449(g) CRR	(g)	A summary of their accounting policies for securitisation activity, including where relevant a distinction between securitisation and re-securitisation positions	Securitisations: Securitisations may require Group companies to enter into transactions to transfer assets to a Structured Entity (SE). Under IFRS, a structured entity is consolidated in the Group's financial statements when the substance of the relationship between the Group and the structured entity indicates that the structured entity is controlled by the Group and meets the criteria set out in IFRS 10 Consolidated Financial Statements. The Group's accounting policy for consolidation is set out under 'Basis of consolidation' in the Group's financial statements. The Group controls a SE where the Group is exposed to, or has rights to, variable returns from its involvement with the SE and has the ability to affect those returns through its power to direct the activities of the entity. An SE is fully consolidated from the date on which control is transferred to the Group. They are derecognised from the date that control ceases.
			The Group derecognises a financial asset when the contractual rights to the cash flows from the assets expire or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the assets are transferred or in which the Group neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the assets. The Group's accounting policy for derecognition is set out under 'Derecognition' in the Group's financial statements.
			When an SE is consolidated by the Group or if transferred assets fail to meet the derecognition test, the Group's balance sheet will includes the assets prior to and post transfer to the SE.
			Synthetic securitisations: In a synthetic securitisation transaction, the underlying assets are not sold into the relevant SE. Instead, their performance is transferred into the vehicle through a synthetic instrument such as a credit linked note or a financial guarantee. The Group's accounting policy for 'Financial guarantees purchased by the Group' in the Group's financial statements as well as the accounting policies outlined above will apply to synthetic securitisations.
			Re-securitisation: The Group did not have any re-securitisation positions in 2024.
			Investments in third-party Securitisations: Investments in third party securitisations are accounted for under IFRS 9 as either (i) hold-to-collect and measured at amortised cost or (ii) hold-to-collect and sell and measured at fair value through Other Comprehensive Income. SPPI testing is applied at the point of origination for all new securitisation investments.
Article 449(h) CRR	(h)	The names of the ECAIs used for securitisations and the types of exposure for which each agency is used	The Group utilises the ratings services of several ECAIs, noting that under AIB's Credit Policy for ABS Investments, all securitisation investments made by AIB must have an external credit rating from at least one of the following ECAIs: S&P Global, Moody's, Fitch Ratings, DBRS and KBRA.
			External ratings are used to determine RWEA for securitisations where the SEC-ERBA approach is deemed to apply.
			The Notes in Burlington No.1 d.a.c and Burlington No. 2 d.a.c (retained securitisations) are rated by Moody's and DBRS.

Article 449(i) CRR	(i)	Where applicable, a description of the Internal Assessment Approach as set out in Chapter 5 of Title II of Part Three CRR including the structure of the internal assessment process and the relation between internal assessment and external ratings of the relevant ECAI disclosed in accordance with point (h), the control mechanisms for the internal assessment process including discussion of independence, accountability, and internal assessment process review, the exposure types to which the internal assessment process is applied and the stress factors used for determining credit enhancement levels	AIB does not hold any securitisation positions wherein it applies the Internal Assessment approach as set out in Chapter 5 of Title II of Part Three CRR.
-----------------------	-----	---	---

### 60: Template EU SEC1 - Securitisation exposures in the non-trading book

As per Article 449 point (j) the template shows AIB as an investor and originator, non-trading book carrying amount of securitisation exposures broken down by type as at 31 December 2024.

The Group does not have asset-backed commercial paper 'ABCP' programmes within their traditional securitisations. Traditional Securitisations remained relatively static at € 2.3 bn. AIB transacted its first Significant Risk Transfer 'SRT' as an originator of € 0.8 bn.

		a	b	С	d	e	f	g	h	i	j	k	- 1	m	n	0	
				Institutio	n acts as o	riginator			Ins	titution ac	cts as spons	sor	Institution acts as investor				
			Tradi	tional		Synt	hetic	Sub-	Tradi	tional		Sub-	Tradi	tional		Sub-	
		S	of which	Non	of which		of which SRT	total	STS	Non-STS	Synthetic	total	STS	Non-STS	Synthetic	total	
1	Total exposures	_	_	_	_	819	819	819	_	_	_	_	114	2,174	_	2,288	
2	Retail (total)	_	_	_	_	_	_	-	_	_	_	_	114	40	_	154	
3	residential mortgage	_	_	_	_	_	_	-	_	_	_	_	114	40	_	154	
4	credit card	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_	
5	other retail exposures	_	_	_	_	_	_	_	_	_	_	_	_	_	_		
6	re-securitisation	_	_	_	_	_	_	-	_	_	_	_	_	_	_	_	
7	Wholesale (total)	_	_	_	_	819	819	819	_	_	_	_	_	2,134	_	2,134	
8	loans to corporates	_	_	_	_	819	819	819	_	_	_	_	_	2,123	_	2,123	
9	commercial mortgage	_	_	_	_	_	_	_	_	_	_	_	_	12	-	12	
10	lease and receivables	_	_	_	_	_	_	_	_	_	_	_	_	_	_		
11	other wholesale	_	_	_	_	_	_	_	_	_	_	_	_	_	-	_	
12	re-securitisation	_	_	_	_	_	_	_	_	_	_	_	_	_			

61: Template EU SEG3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

As per Article 489 point ((i)) the template shows the aggregate amount of securitisation positions where All is as no reginator, and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures seducted from own funds or risk-weight or application and research institution of securitisation and research institution exposures, separately positions, and further broked down into a meaningful number of risk-weight or capital requirements and sand by approach used to calculate the capital requirements. The originated securitisation in All is a synthetic STS securitisation and the approach applied is SEC-IRBA. All does not act as a sponsor, has no re-securitisations and applies the SEC-IRBA.

		а	b	c	d	e	f	g	h	i i	j	k	- 1	m	n	0	EU-p	EU-q
			Exposure valu	ies (by RW band	s/deductions)	•	Exp	osure values (by	egulatory appri	oach)		RWEA (by regul	atory approach)			Capital char	ge after cap	
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW / deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW
1	Total exposures	818	-	-	2	-	819	-	-	-	115	-	-	-	9	-	-	- 1
2	Traditional transactions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Retail	-	-	-	-	-	_	-	-	-	_	-	-	-	-	-	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Of which STS	_	-	-	-	-	_	-	-	-	_	-	-	-	_	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	818	-	-	2	-	819	-	-	-	115	-	-	-	9	-	-	-
10	Securitisation	818	-	-	2	-	819	-	-	-	115	-	-	-	9	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	818	-	-	2	-	819	-	-	-	115	-	-	-	9	-	-	-
13	Re-securitisation	-	-	-	-	-	_	_	-	-	_	-	-	-	_	-	_	- 1

62: Template EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

As per Article 449 point (k)(ii) this template shows AIB non-trading book aggregate amount of securitisation positions, where AIB act as investor and the associated risk-weighted assets and capital requirements by regulatory approaches as at 31 December 2024.

AIB applies the standardised approach and external ratings based approach to determining its securitisation RWEAs in accordance with Regulation (EU) 2017/2401.

Securitisation RWEAs remained relatively static between June to December 2024.
There was no increase in RWEA as a result of credit under-performance in the securitisation portfolio.

		а	b	С	d	е	f	g	h	i	j	k	- 1	m	n	0	EU-p	EU-q
		Ex	posure valu	es (by RW b	ands/dedu	ctions)	Exposur	e values (b	regulatory	approach)	RWE	A (by regula	atory appro	ach)	С	apital charg	e after cap	
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW
1	Total exposures	1,804	_	117	367	-	-	484	1,804	-	_	572	265	_	_	46	21	_
2	Traditional securitisation	1,804	_	117	367	-	-	484	1,804	-	_	572	265	_	_	46	21	_
3	Securitisation	1,804	_	117	367	-	-	484	1,804	-	_	572	265	_	_	46	21	_
4	Retail underlying	154	_	-	_	-	-	_	154	-	_	_	17	_	_	_	1	_
5	Of which STS	114	_	-	_	-	-	_	114	-	_	_	11	_	_	_	1	_
6	Wholesale	1,650	_	117	367	-	-	484	1,650	-	_	572	248	_	_	46	20	_
7	Of which STS	-	_	-	_	-	-	_	_	-	_	_	-	_	_	_	_	_
8	Re-securitisation	_	_	-	_	-	-	_	_	-	_	_	-	_	_	_	_	_
9	Synthetic securitisation	_	_	-	_	-	-	_	_	-	_	_	-	_	_	_	_	_
10	Securitisation	_	_	-	_	-	_	_	_	-	_	_	-	_	_	_	_	_
11	Retail underlying	_	_	-	_	-	_	_	_	-	_	_	-	_	_	_	_	_
12	Wholesale	_	_	-	_	-	_	_	_	-	_	_	-	_	_	_	_	_
13	Re-securitisation	_	-	_	_	-	-	_	_	_	_	_	_	_	_	_	_	_

Chapter 14. Disclosure of the use of standardised approach for market risk

As per Article 435(1) the table below provides information on the Group's market risk management

Points (a) and (d) of Article 435

A description of the institution's strategies and processes to manage market risk, including:

-An explanation of management's strategic objectives in undertaking trading activities, as well as the processes implemented to identify, measure, monitor and control the institution's market risks

 A description of their policies for hedging and mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges

Market risk is managed against a range of Board approved limits which cover market risk in the trading book, interest rate risk in the banking book and credit spread risk in the banking book. The Board approved limits are supplemented by a range of ALCo approved limits.

Market risk is identified and assessed using portfolio sensitivities, Value at Risk ("VaR") and stress testing. Interest rate gaps and sensitivities to various risk factors are measured and reported on a daily basis. In terms of the VaR metric, AIB calculates a daily historical simulation VaR to a 95% confidence level, using a one day holding period and based on one year of historic data. In addition to VaR, Capital at Risk ("CaR") is also measured to a one year (1) time horizon, a 99% confidence level and a longer set of data. Nominal, sensitivity and 'stop loss' limits are also used.

Market risk is taken on by the bank as a consequence of the bank facilitating its customer requirements for derivatives and to a lesser extent in pursuit of a return. As stated in the bank's Risk Appetite Statement (RAS), the bank does not have an appetite for large proprietary market risk positions in the Trading Book, and has a low appetite for income volatility instead targeting steady, sustainable earnings. Market risk strategy is aligned to the RAS.

When a financial instrument is designated as a hedge, the Group formally documents the relationship between the hedging instrument and hedged item as well as its risk management objectives and its strategy for undertaking the various hedging transactions. The Group also documents its assessment, both at hedge inception and on an ongoing basis, of whether the derivatives that are used in hedging transactions are highly effective in offsetting changes in fair values or cash flows of the hedged items.

A Structural Interest rate Hedging Programme is used by AIB to ensure stable Net Interest Income. 1LOD make proposals to ALCo on how this interest rate management strategy should be effected, outlining the expected net interest income impacts. 2LOD provide an accompanying review and challenge to ALCo.

Point (b) of Article 435 (1) CRR

h

A description of the structure and organisation of the market risk management function, including a description of the market risk governance structure established to implement the strategies and processes of the institution discussed in row (a) above, and that describes the relationships and the communication mechanisms between the different parties involved in market risk management.

The Group implements a strong risk management approach to protect its customers and mitigate risks. The Group achieve this through identifying the Principal Risks and Uncertainties, including the key Emerging Risk Drivers, which could adversely impact its customers, business, stakeholders and the delivery of the Group's strategic objectives.

The Group operates a three lines of defence model for risk management. For market risk 1LOD comprises the Finance and Treasury functions who report to the CFO. The Group's Finance function is responsible for the identification, measurement and reporting of the Group's aggregate market risk profile.

The Group's Treasury function is responsible for the management of the majority of market risk in the Bank, with a small amount of market risk existing in the Goodbody Stockbrokers subsidiary.

1LOD documents an annual Market Risk Strategy and Appetite statement as part of the annual financial planning cycle which ensures market risk aligns with the Group's strategic business plan.

2LOD provides review and challenge, risk oversight and proposes and maintains the Market Risk Management Framework and Policies as the basis of the Group's control architecture for market risk activities, including the annual agreement of market risk limits (subject to the Board approved Risk Appetite Statement). All subsidiaries within the Group which are exposed to market risk must align to the Market Risk Management Framework.

3LOD comprises Group Internal Audit which provides third line assurance on market risk.

The Group has implemented a strong risk management approach to identifying, assessing and managing risks. To support this approach, a number of frameworks and policies approved by the Board (or Board delegation) are in place which set out the key principles, roles and responsibilities and governance arrangements through which the Group's material risks are managed and mitigated. These frameworks and policies are subject to annual review by the respective risk owners. The monthly Chief Risk Officer ("CRO") Report provides qualitative and quantitative information on the management of the material risks to which the Group is exposed.

The core aspects of the Group's risk management framework including Risk strategy and culture, Risk identification and assessment, Risk measurement and management, Risk monitoring, escalating and reporting are set out in the Annual Financial Report 2024.

The Group undertakes semi-annual stress testing on all the Group's exposures including loans and receivables, the investment securities book, equity investments and other exposures related to our Treasury business and the macroeconomic scenarios used for planning and internal stress testing purposes are reviewed by the Asset and Liability Committee (ALCo) and by the Board Risk Committee.

An important part of the Group's Risk Management Framework is the setting of the Group Risk Appetite Statement ("RAS"). The RAS is a blend of qualitative statements and quantitative limits and triggers linked to the Group's strategic objectives. The overarching qualitative statements for the RAS are reflected in the Annual Financial Report 2024. The Group's risk profile is measured against its risk appetite and during 2024 the Group RAS was reported to the Group Risk Committee and Board Risk Committee.

c Point (c) of Article 435 (1) CRR

Scope and nature of risk reporting and measurement systems

The Group assumes market risk as a result of its banking and trading book activities. The main components of market risk are:

- Credit spread risk is the exposure of the Group's financial position to adverse movements in the credit spreads of bonds held in the hold-to-collect-and-sell ("HTCS") securities portfolio. Credit spreads are defined as the difference between bond yields and interest rate swap rates of equivalent maturity. The HTCS bond portfolio is the principal source of credit spread risk. The Group also monitors the credit spread risk in its hold-to-collect ("HTC") bond portfolio:
- Interest rate risk in the banking book ("IRRBB") is the current or prospective risk to both the earnings and capital of the Group as a result of adverse movements in interest rates. Changes in interest rates impact the underlying value of the Group's assets, liabilities and off-balance sheet instruments and, hence, its economic value (or capital position). Similarly, interest rate changes will impact the Group's net interest income (NII) through interest-sensitive income and expense effects: and
- The Group also assumes market risk through its trading book activities which relate to all positions in financial instruments (principally derivatives) that are held with trading intent or in order to hedge positions held with trading intent. Risk associated with valuation adjustments such as credit value adjustment ("CVA") and funding value adjustment ("FVA") are managed by the trading unit in the Group's Treasury function.

Market risk is identified and assessed using portfolio sensitivities, Value at Risk ("VaR") and stress testing. Interest rate gaps and sensitivities to various risk factors are measured and reported on a daily basis. In terms of the VaR metric, AlB calculates a daily historical simulation VaR to a 95% confidence level, using a one day holding period and based on one year of historic data. In addition to VaR, Capital at Risk ("CaR") is also measured to a one year(1) time horizon, a 99% confidence level and a longer set of data.

Market risk is managed against a range of Board approved VaR limits which cover market risk in the trading book, interest rate risk in the banking book and credit spread risk in the banking book. The Board approved limits are supplemented by a range of ALCo approved limits which include VaR limits, nominal and sensitivity limits and 'stop loss' limits.

On a daily basis front office and risk functions receive a range of valuation, sensitivity and market risk measurement reports, while ALCo receives a monthly market risk commentary and summary risk profile. Market risk exposures are reported to the Group Risk Committee ("GRC") and Board Risk Committee ("BRC") on a monthly basis through the CRO Report.

## 64: Template EU MR1 - Market risk under the standardised approach

As per Article 445, this template shows the RWEAs for standardised market risk split between outright products, options and securitisation. This template includes exposures subject to the standardised approach only.

The movement in market risk RWEA between June and December 2024 is primarily driven by an increase in:

• Interest rate RWEA of € 0.3 bn relating to higher FX swap volumes.

There was no contribution from foreign exchange risk as the ratio between the total open net positions and total own funds was below the 2% regulatory driven threshold.

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	644
2	Equity risk (general and specific)	29
3	Foreign exchange risk	_
4	Commodity risk	54
	Options	
5	Simplified approach <sup>1</sup>	
6	Delta-plus approach	4
7	Scenario approach <sup>2</sup>	
8	Securitisation (specific risk) <sup>3</sup>	
9	Total	730

<sup>&</sup>lt;sup>1</sup> The Group does not have approval for the simplified approach.

<sup>&</sup>lt;sup>2</sup> The Group does not use the scenario approach.

<sup>&</sup>lt;sup>3</sup> The Group does not have trading securitisation instruments or correlation trading portfolios.

**Chapter 15. Disclosure of operational risk** 

As per Articles 435(1) points (a), (b), (c) and (d), Article 446 and Article 454 see the table below:

Legal basis	Row		Qualitative information
Points (a), (b), (c) and (d) of Article 435(1) CRR	(a)	Disclosure of the risk management objectives and policies	Strategies & Processes Article 435(1) (a) Operational Risk is the risk arising from inadequate or failed internal processes, people and systems, or from external events. This includes legal risk (the potential for loss arising from the uncertainty of legal proceedings and potential legal proceedings), but excludes strategic risk. Operational Risks can result in customer, financial, and reputational impacts and for this reason reputational risk is considered in our RCA processes and in the management of Operational Risk events. Additionally, the impact of Climate and Environment Risk(C&E), Social Risk(S) and Governance Risk(G) drivers materialise in the form of Operational Risk.
			Operational Risk is identified and assessed by the Group's material risk assessment which is a top down process and it also identifies the sub risks i.e. information security (including cyber risk), change risk, physical safety and property risk, continuity and operational resilience risk, product and proposition risk, third party risk, technology risk, data risk, fraud risk, people risk and galar lisk. The risk and control assessment is the Group's core bottom-up process for the identification and assessment of operational risk across the Group.
			There is an Operational Risk Framework in place which sets out the principles, supporting policies, roles and responsibilities, governance arrangements and processes for Operational Risk management across AIB.
			Each sub risk has a supporting policy in place to outline the minimum control standards and core policy rules that must be adhered to. The eleven operational sub risks are owned and actively monitored under the Operational Risk Framework (and underlying Policies) to ensure Operational Risks are managed effectively within the parameters set out in the Group Risk Appetite Statement (Group RAS). Note as part of the Group MRA approved by Board in August 2024 Information Security (including Cyber) risk was approved as a material risk to the Group from 1st January 2025 and will no longer be a sub risk of Operational Risk. The Group MRA considered a number of factors as part of this assessment including impact on our capital, historical loss events in AlB, external loss events sourced from ORX, the RCA, the assessment of emerging risks and consideration of the regulatory horizon.  The Operational Risk Framework and Policies set out the process for risk and control assessments, identification of the key non-financial risks
			arising from key business processes and activities and the process for the escalation of the relevant RAS metric limit and watch-trigger breaches.
			Structure & organisation of risk management for Operational Risk Article 435(1) (b)  The Group Head of Operational Risk reports directly to the Chief Risk Officer and has primary responsibility for the Operational Risk Punction. The Operational Risk objectives which support delivery of AIB's overall strategic objectives are:  Formulate AIB's Risk Appetite for Operational Risk and ensure that AIB's Operational Risk profile and business and financial plans are consistent with it:
			<ul> <li>Promote a strong risk culture throughout the organisation;</li> <li>Establish and maintain the Operational Risk management architecture of AIB, ensuring that AIB has robust processes in place to identify, assess, monitor, manage and report its key operational risks and risk drivers, where relevant;</li> <li>Ensure AIB has a strong risk governance and internal control environment in place;</li> <li>Ensure through its risk assessment techniques that AIB has sufficient resilience to withstand a range of adverse scenarios;</li> </ul>
			<ul> <li>Support improvements in operational and strategic decisions throughout AIB; and,</li> <li>Foster an environment of continuous improvement and learning from mistakes.</li> </ul>
			Risk Measurements & Control Article 435(1) (c) The Risk and Control Assessment (RCA) process is in place across the Group to support management's evaluation of the key Operational Risks facing the Group and associated mitigating controls. The identified Operational Risks and mitigating controls are reviewed and signed off every six months by management up to and including ExCo level to confirm that the controls recorded are appropriate and operating effectively. The review of the RCA takes into account Operational Risk Events which occurred during the relevant period and any testing which took place on key controls. Self-assessment of risks is completed at business unit level and is recorded on SHIELD which is the Group's governance, risk and compliance system.
			Each business area is primarily responsible for managing its own risks. The Operational Risk Framework has supporting policies specific to each Operational sub risk to ensure an effective and consistent approach to Operational Risk management across the Group. Operational Risk is measured through a series of risk appetite metrics and key risk indicators, these include metrics on Operational Risk losses and events; cyber security, change initiatives, quality and accessibility of priority data, service availability and service performance of third parties.
			The potential impact of the identified risks are then assessed through the ICAAP and stress-testing processes where scenarios relating to this risk (such as internal/external fraud, system outages, cyber attack, and data quality issues) are developed and incorporated into the overall outcomes. The Operational Risk model used to forecast operational risk capital utilises a number of inputs which include internal operational risk event loss data, external operational risk event loss data, external operational risk event loss data and loss scenarios.
			Operational Risk Reporting Article 435(1) (c) The primary objective of Operational Risk reporting is to provide the Board with a timely and pertinent update on the Operational Risk profile. A secondary objective is to provide senior management with an overview of the Operational Risk profile, in order to support the effective management of risks. Operational Risk is monitored on a monthly basis via the Group's risk governance committees. This provides senior management, through the Operational Risk Committee and Group Risk Committee and the Board through Board Risk Committee with timely updates on the Group's operational risk profile. The profile update details the current status of the Group's key Operational Risks and includes an overview of current trends. It also includes an update on recent major risk events and any remediation actions/lessons identified following events.
			Hedging & Mitigating Operational Risk Article 435(1) (d) Operational Risk provides independent second line oversight and challenge of Operational Risk in the organisation. The role of Operational Risk is to review Operational Risk management activities across the Group including setting policy and promoting best practice disciplines, augmented by an independent Group Risk Assurance process which sits in the Second Line Assurance Function who provide independent and objective second line assurance on the quality and effectiveness of the Group's risk management activities, the internal control system and the first line of defence via a risk-based assurance plan. In addition, First Line Assurance within the Segments and key horizontal functions incorporate, facilitate and complete Operational Risk management into relevant assurance reviews within their business area, including testing key controls in each of the business areas and providing assurance that the control environment is operating as it should while providing insights for continuous improvement.
			Operational Risk is also partially hedged through an insurance programme in place, including a self-insured retention, to cover a number of risk events which would fall under the Operational Risk umbrella. These include financial lines policies (comprehensive crime/computer crime; cyber liability; professional indemnity/civil liability; employment practices liability; directors and officers liability and a suite of general insurance policies to cover such things as property and business interruption, terrorism, employers and public liability and personal accident).
Article 446 CRR	(b)	Disclosure of the approaches for the assessment of minimum own funds requirements	AIB Group uses the standardised approach (TSA) to assess the minimum own funds requirements. The capital requirement is calculated as a percentage of income and uses an average of three year historical income.
Article 446 CRR	(c)	Description of the AMA methodology approach used (if applicable)	N/A - AIB Group uses the Standardised Approach (TSA) to assessing the minimum own fund requirements.
Article 454 CRR	(d)	Disclose the use of insurance for risk mitigation in the Advanced Measurement Approach (if applicable)	N/A - AIB Group uses the Standardised Approach (TSA) to assessing the minimum own fund requirements.

### 66: Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

As per Articles 446 and Article 454, this template provides information on the calculation of own funds requirements in accordance with Articles 312 to 324 (for Operational Risk under the Basic Indicator Approach 'BIA', the Standardised Approach 'TSA', the Alternative Standardised Approach 'ASA' and the Advanced Measurement Approaches 'AMA') of Title III of Part Three CRR.

Income used in the calculation of own funds requirements is based on the Group's audited figures for each relevant year (2024-2022) and increased due to higher 3-year average income. AIB does not use the BIA, ASA or AMA approaches.

			b	С	d	е
Banking activities		F	Relevant indicato	Own funds	Risk exposure	
		Year-3	Year-2	Last year	requirements	amount
1	Banking activities subject to basic indicator approach (BIA)					
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	2,826	4,685	4,937	595	7,434
3	Subject to TSA:	2,826	4,685	4,937		
4	Subject to ASA:					
5	Banking activities subject to advanced measurement approaches AMA					

Chapter 16. Disclosure of exposures to interest rate risk on positions not held in the trading book	

## 67: Table EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities

As per Article 448(1), points (c) to (g) see table below.

Legal basis	Row number		Qualitative information			
Article 448 (1) (e)	(a)	A description of how the institution defines IRRBB for purposes of risk control and measurement.	Non-trading interest rate risk (also referred to as interest rate risk in the banking book 'IRRBB') is defined as the current or prospective risk to both the Group's capital and earnings arising from movements in interest rates that effect the banking book positions.			
			IRRBB results from the structure of the Group's balance sheet due to normal banking activity with customers and from treasury's discretionary positions in the banking book. This risk can arise where assets, liabilities and off-balance sheet items have different repricing dates, interest rate basis or behavioural characteristics. The Group requires that interest rate risk is positioned centrally for management purposes.			
			The management of IRRBB is aligned to the following strategic aims and objectives :			
			i AIB is a retail and commercial Bank and any significant market risk- taking must be aligned with the Group's overall strategy and appetite and be proportionate to the size and nature of the Group's core banking activities.			
			ii AIB manages structural market risks centrally as part of the Bank's ALM process, seeking to achieve stable Net Interest Income balanced against the capital required to support economic value risks (i.e. Structural Hedging);			
			iii Market risk management is a core competence of Treasury who are mandated to add value through discretionary risk-taking within delegated limits. IRRBB is managed against a range of Board approved risk limits which cover both Economic Value and Earnings perspectives. The Board approved limits are supplemented by a wider range of ALCo approved limits which include VaR limits, nominal and sensitivity metrics.			
Article 448 (1) (f)	(b)	A description of the institution's overall IRRBB management and mitigation strategies.	IRRBB management and mitigation strategies			
		Thinguish structures.	The first line comprises the Finance and Treasury functions who report to the CFO. The Group's Finance function is responsible for the identification, measurement and reporting of the Group's aggregate market risk profile. The Group's Treasury function is responsible for managing market risk that has been transferred to it by the customer facing businesses. Treasury also has a mandate to trade on its own account in selected wholesale markets with risk tolerances approved on an annual basis through the Group's Risk Appetite process.			
			The first line documents an annual Market Risk Strategy statement as part of the annual financial planning cycle which ensures market risk aligns with the Group's strategic business plan. The Financial Risk function, reporting to the CRO, is responsible for the development of market risk measurement methodologies. It provides review and challenge risk oversight and proposes and maintains the Market Risk Management Framework and Policies as the basis of the Group's control architecture for market risk activities, including the annual agreement of market risk limits (subject to the Board approved Risk Appetite Statement). The third line of defence comprises Group Internal Audit which provides third line assurance on market risk.			
			The Group recognises that the effective management of IRRBB is essential to the maintenance of stable earnings, the preservation of shareholder value and the achievement of the Group's strategic objectives. It is Group policy to minimise exposure to IRRBB subject to defined limits, though certain structural market risks remain and, in some cases, are difficult to eliminate fully. The management of IRRBB strikes an sound balance between the benefits of consciously maintaining Earnings Sensitivity close to a target level against the Economic Value risk that can arise as a consequence.			

Article 448 (1)	(c)	The periodicity of the calculation of	IRRBB risk measurement
(e) (i) and (v); Article 448 (2) Article 448 (1) (e) (ii); Article 448 (2) Article 448 (1)	(e) (g)	the institution's IRRBB measures, and a description of the specific measures that the institution uses to gauge its sensitivity to IRRBB.  A description of the key modelling and parametric assumptions	Non-trading interest rate risk is measured and controlled in AIB using an economic value stress test, an earnings at risk and a VaR approach. As per Article 448 (a), the nature of the interest rate risk and the key assumptions are outlined here:
(c); Article 448 (2)		all paralletin assumptions different from those used for disclosure of template EU IRRBB1 (if applicable).  A description of key modelling and parametric assumptions used for the IRRBB measures in template EU IRRBB1 (if applicable).	For the economic value stress test, the interest rate sensitivity profiles of the various components of AlB's balance sheet are measured and severe but plausible interest rate shocks are applied to these profiles. The magnitude of the interest rate shocks is consistent with a one year holding period and a 99% confidence level. The resulting change in economic value as a result of the application of these shocks is the IRRBB economic value exposure. Basis risk is a component of this IRRBB risk measurement model. This measurement is calculated and reported monthly.
			<ul> <li>An earnings at risk (EaR) measurement approach measures the quantity by which the Group's annual net interest income might change in the event of an adverse change in interest rates. EaR is estimated quarterly by modelling how net interest income would perform under different interest rate environments and selecting the worst scenario to apply to the balance sheet. An earnings sensitivity measurement of how the Group's annual net interest income would change under parallel rate shifts is also calculated and reported monthly.</li> </ul>
			<ul> <li>IRRBB is also quantified using a 95% one day VaR measure and sensitivity measures. The VaR and interest rate sensitivity values are produced and reported daily for internal control purposes. Certain components of the balance sheet such as non-maturity deposits and the Group's equity are modelled using behaviourally adjusted assumed lives.</li> </ul>
			<ul> <li>The NII scenarios presented are produced on a static balance sheet basis. The Bank uses a dynamic balance sheet for strategic planning purposes. Assumptions are also made about how the relationship between market and retail interest rates would develop in different interest rate environments. These assumptions are determined using a combination of statistical analysis and management judgement. Commercial margins are not considered when modelling from an economic value perspective but are included when modelling from an earnings perspective.</li> </ul>
			The economic value and NII earnings stress tests apply a lower bound (a floor) to downward interest rate shocks in EUR, GBP and USD in line with the SOT rate shock floors.
			Certain products have contractual floors that are also reflected in the risk analysis.
			Whilst early withdrawals of fixed term deposits and drawing of commitments are risks which exist, they are not considered to be a materia risk and are not included in IRRBB modelling.
Article 448 (1) (e) (iii);	(d)	A description of the interest rate shock and stress scenarios that the	The following scenarios are used to measure economic value and/or net interest income:
Article 448 (2)		institution uses to estimate changes in the economic value and in net	- 99% 1 year shock
		interest income (if applicable).	- Parallel shock up +100bps
			- Parallel shock down -100bps
			- Earnings at Risk rate scenario
			The following SOT scenarios are used to measure the economic value of equity:
			- Parallel shock up +100bps
			- Parallel shock down -100bps
			- Steepener (short rates down and long rates up)
			- Flattener (short rates up and long rates down)
			- Short rates up
			- Short rates down

Article 448 (1) (e) (iv);	(f)	A high-level description of how the bank hedges its IRRBB, as well as	Structural Hedging Programme
Article 448 (2)		the associated accounting treatment (if applicable).	The Structural Hedging Programme (SHP) is managed by Group Treasury and provides the framework for assessing this balance, culminating in the articulation of an (at least) annual SHP Recommendation to Group ALCo. The supporting analysis considers the latest Financial Plan forecasts, NII scenario analysis, IRRBB stress test scenarios and input from Treasury in terms of the Bank's Rate view. In framing the annual SHP Strategy, Group ALM take into account the following criteria:
			i Balance Sheet mix – an analysis of the current and prospective forecast of balance sheet evolution, focusing on both volume change and the interest rate profile.
			ii Earnings Volatility – portfolios that contribute the most (and least) variation to expected income/expense are evaluated, with particular emphasis on the outturn of monthly Earnings Sensitivity (Static B/S) metrics.
			iii Economic Value – the quantum of capital required to support open interest rate risk positions attributable to gap risk, basis risk and customer behaviour are all estimated.
			iv Treasury Rate View – insight is sought from the Front office to understand where we are in the interest rate cycle and the consequent read through to Bank margins , as well as the likely trajectory for SHP portfolio returns.
			v Other Considerations – Regulatory: the extent to which SHP term risk can be offset with behaviouralised Core Non-Maturity Deposit ('NMD') balances and/or Core Capital when calculating ICAAP Pillar 2; Accounting: Cashflow Hedging requirements/capacity and the read through to changes in the Bank's Reserve Account (placed with the ECB), the timing of Libor repapering and impact on basis risk profile.
			Treasury are responsible for executing the SHP instructions in the market, managing the Bank's consolidated interest rate risk profile and also retain the capacity to take discretionary Banking Book risk on its own account. Consequently, the size, shape and duration of the actual 3rd party swap portfolio does not mirror the intended "model SHP portfolio" approved annually by ALCo. However, the portfolio is mandated to retain a broadly replicating structure, targeting a weighted average life of circa 5 years and a policy of incremental new investments.
			Additional Treasury-centric limits exist within the framework ensure the various dimensions of Treasury's active position management is appropriately controlled e.g. daily PV01, VaR, EV metrics and limits.
Article 448 (1) (d)	(h)	Explanation of the significance of the IRRBB measures and of their significant variations since previous disclosures	IRRBB measurement variation from previous period  In Template EU IRRBB1 the Bank includes an explanation of variances from previous period for IRRBB measures. This will include variances on a nominal basis and as percentage of Tier 1 Capital that are shown in the template.
			The explanation will detail the primary drivers of the IRRBB changes for both on and off balance sheet IRRBB positions.
	(i)	Any other relevant information regarding the IRRBB measures disclosed in template EU IRRBB1 (optional)	Not applicable for this period
Article 448 (1) (g)	(1) (2)	Disclosure of the average and longest repricing maturity assigned to non-maturity deposits	The bank has completed a behavioural modelling exercise to determine the expected behaviour of non-maturing deposits. The analysis modelled the historical behaviour of accounts within the bank, with the accounts categorised into similar cohorts, and modelled as groups to ensure consistent behaviour of account types. The cohorts are split into Core / Non Core volumes, with the Core volumes attracting a longer dated maturity profile. For the Core volumes the average maturity ranges from 3.4 to 5 years (with Regulatory Caps applied), with a maximum re-pricing maturity of 10 years for retail deposits. In the absence of Regulatory caps, the modelled maturity can reach 20 years. The modelling of the interest calculated on the Non-Maturing account cohorts is modified to reflect increased interest charges under large interest stresses from the baseline scenario. The modelling reflects that, for these instantaneous stressed interest rate rising scenarios (>= +100bps), the volumes of non-maturing deposits will migrate to deposits with higher interest reward.  In addition the Bank assigns modelled weighted average lives to
			some customer asset products also such as overdrafts and credit cards. Non-performing loans have time periods assigned based on credit analysis information on expected recovery of cashflows which is incorporated into the Banking Book EV risk position.

### 68: Template EU IRRBB1 - Interest rate risks of non-trading book activities

As per Article 448(1), points (a) and (b), the following template shows the impact on the Group's net interest income ('NII') and change of the economic value of equity ('EVE') for the banking book positions from interest rate changes under the six standard scenarios defined by the European Banking Authority ('EBA') known as the Supervisory Outlier Test ('SOT'). In these scenarios equity is excluded from the cash flows and the EBA prescribed floors are applied which could limit the impact on downward shocks. Also shown are the metrics arising from key internal scenarios. The table has been provided in percentage terms relative to Tier 1 Capital to give an indication of the significance of the different shocks.

As per Article 448(1), point (d) the previous period results are shown in the template with comments on variation provided below.

The change in the economic value ('EV') impact between June 2024 and December 2024 is due to a combination of continued migration of customer deposits into term products and decay in the fixed rate mortgage portfolio, both of which resulted in a reduction in the overall net asset position in the banking book. The Structural Hedging Programme ('SHP') swap portfolio was maintained at a constant volume throughout H2 2024 and had limited impact on the reduction in EV exposure.

The NII sensitivity calculation is based on a static balance sheet with no migration between products. It is acknowledged that the changing rate environment is likely to result in further migration of balances from interest free current accounts to rate paying term deposit accounts, which, upon repricing, would have the impact of reducing the NII sensitivity reported below. Over the period, the NII sensitivity (parallel down) has increased, due to a combination of factors: lower deposit rate projections have had a dampening impact on deposit beta dynamics, while an increase in the level of customer deposits has resulted in a corresponding increase in the volume of interest rate sensitive assets.

### Template EU IRRBB1 - Interest rate risks of non-trading book activities

		а	b	С	d
Supervisory shock scenarios		Changes of the economic value of equity		Changes of the net interest income	
		Current period	Last period	Current period	Last period
1	Parallel up	(1,274)	(1,298)	783	740
2	Parallel down	426	471	(905)	(839)
3	Steepener	(48)	(60)		
4	Flattener	(205)	(202)		
5	Short rates up	(587)	(584)		
6	Short rates down	225	242		

#### Supplementary Table 1

In accordance with Article 84 of Directive 2013/36 EU the Group's internal measurement of EVE and NII EaR are also disclosed below:

Additional rate shocks	Changes of the econ	omic value of equity	Changes of the net interest income		
Additional rate shocks	Current period	Last period	Current period	Last period	
	31/12/2024	30/06/2024	31/12/2024	30/06/2024	
99% 1 year shock	(850)	(921)			
Parallel 100bps shock up			383	347	
Parallel 100bps shock down			(439)	(385)	
Tier 1 capital	10,613	10,659	10,613	10,659	

### Supplementary Table 2

The following table quantifies the change in EV and NII as a % of Tier 1 capital

Supervisory shock scenarios		Changes of the economic value of equity		Changes of the net interest income		
	Supervisory snock scenarios	Current period	Last period	Current period	Last period	
		31/12/2024	30/06/2024	31/12/2024	30/06/2024	
1	Parallel shock up	(12.00)%	(12.18)%	7.38 %	6.94 %	
2	Parallel shock down	4.01 %	4.42 %	(8.53)%	(7.87)%	
3	Steepener (short rates down and long rates up)	(0.45)%	(0.56)%			
4	Flattener (short rates up and long rates down)	(1.93)%	(1.90)%			
5	Short rates up	(5.53)%	(5.48)%			
6	Short rates down	2.12 %	2.27 %			

Additional rate shocks	Changes of the econ	omic value of equity	Changes of the net interest income	
Additional rate shocks	Current period	Last period	Current period	Last period
	31/12/2024	30/06/2024	31/12/2024	30/06/2024
99% 1 year shock	(8.01)%	(8.64)%		

Parallel 100bps shock up		3.61 %	3.26 %
Parallel 100bps shock down		(4.13)%	(3.61)%

**Chapter 17. Disclosure of remuneration policy** 

## 69: Table EU REMA - Remuneration policy

As per Articles 450(1), points (a) to (f), and points (j) and (k), and Article 450(2) see table below

#### Introduction

These disclosures provide information about the Group's remuneration policies and practices and, more specifically, qualitative information about:

- a) The bodies that oversee remuneration;
- b) The design and structure of the remuneration system for those individuals who have been identified as Material Risk Takers (MRTs);
- c) The ways in which current and future risks are taken into account in the remuneration processes;
- d) The ratios between fixed and variable remuneration set in accordance with the regulatory requirements;
- e) The ways in which the Group seeks to link performance and remuneration:
- f) The ways in which the Group seeks to adjust remuneration to take account of long term performance;
- g) The main parameters and rationale for any variable components scheme and any other non-cash benefit;
- h) Upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management;
- i) The use of derogations in Article 94(3) CRD;
- j) These disclosures also include quantitative information, in aggregate form, about the amounts and structure of the remuneration of MRTs in AIB and should be read in conjunction with the information contained in the Corporate Governance Remuneration Statement of the Group's Annual Financial Report.

#### Qualitative disclosures

#### a) Information relating to the bodies that oversee remuneration

## Main body overseeing the remuneration policy

The Remuneration Policy is governed by the Remuneration Committee (the Committee) on behalf of the Board. Its members are non-executive directors of AIB.

The Committee is responsible for determining the Remuneration Policy and for overseeing its implementation. The Committee oversees the operation and effectiveness of the Remuneration Policy, including the process for the identification of MRTs.

The Committee further ensures that the Remuneration Policy and practices are subject to a review at least annually, taking into account the alignment of remuneration to the Group's culture for all employees and directors. The annual review is informed by appropriate input from the Group's risk, compliance and internal audit functions to ensure that remuneration policies and practices are operating as intended, are consistently applied across the Group and are compliant with regulatory requirements.

The remuneration of Executive Directors, ExCo members, the Group Company Secretary and Group Heads of Risk, Compliance and Audit is directly overseen by the Remuneration Committee. The Remuneration Committee delegates authority to management to approve individual remuneration proposals within the agreed policy, as considered appropriate, for Material Risk Takers.

The Committee met on eleven occasions during 2024.

## **External consultants**

The Committee was supported in its work by Korn Ferry as the external remuneration consultants appointed by the Committee in October 2022. Korn Ferry is a signatory to the voluntary code of conduct in relation to remuneration consulting in the UK.

Aside from their work supporting the Committee, during 2024 Korn Ferry provided professional services in the ordinary course of business to AIB. The Committee is satisfied that the advice received is independent and objective.

## **Scope of Remuneration Policy**

The scope of the Remuneration Policy includes all financial benefits available to all employees and extends to all individual subsidiaries, entities, branches including all employees and directors of the Group at consolidated and sub-consolidated levels.

## Material Risk Takers (MRTs)

AIB's MRTs have been identified in line with the relevant regulations and principally comprise the following:

- i. Executive and non-executive members of the boards of directors of material Group entities;
- ii. ExCo Members and Senior Management Teams of material Group entities;
- iii. Heads of material business units and their direct reports who have managerial responsibility for subordinated business units;
- iv. Heads of Risk, Compliance and Internal Audit and their direct reports, who are head of sub-functions;
- v. Members of the most senior credit committee at group level (and similarly for subsidiaries) and at a subsidiary level those staff who have responsibility for initiating, approving or vetoing credit proposals which are significant at a subsidiary level;
- vi. Senior management responsible for legal, accounting policies and procedures, finance (including taxation and budgeting), human resources, remuneration policy, IT, information security, economic analysis, the prevention of money laundering and terrorist financing, managing outsourcing arrangements and other key risk functions; and
- vii. Other key risk takers or higher remunerated staff whose professional activities individually or collectively exert influence on the institution's risk profile, including the ability to enter into transactions, contracts and other risk positions or to approve or veto the introduction of new products.

During 2024, a total of 298 individuals were identified as Material Risk Takers across AIB Group and its material subsidiaries (2023: 296).

#### b) Information relating to the design and structure of the remuneration system for MRTs

## Key features and objectives of remuneration policy

The Group's remuneration philosophy aims to ensure that all employees are rewarded fairly and competitively for their contribution to the Group's future success and growth.

The Group Remuneration Policy sets the framework for all remuneration related policies, procedures and practices for all employees and directors of the Group. It is designed to foster a truly customer focused culture; create long term sustainable value for customers and shareholders; attract, develop, motivate and retain the right calibre of individuals; and safeguard the Group's capital, liquidity and risk positions.

The Group is committed to a simple, transparent and affordable reward structure that clearly links performance and remuneration using a combination of "What" objectives and "How" behaviours. Remuneration of all employees, including MRTs, is designed to promote high performance, a strong risk management culture, and risk-taking aligned to risk appetite.

The Group also aims to align remuneration with industry peers and competitors for talent in each principal geographical location, as assessed against market benchmarks. However, the application of market aligned remuneration policies and practices continued to be constrained for some employees and the directors in 2024 by the remaining government restrictions, which include a cap on individual salaries of €500,000 and an annual limit on variable remuneration of €20,000. The remuneration restrictions applying to AIB do not apply to Goodbody.

As a result of the restrictions in place, the Group's MRTs predominantly received fixed remuneration in 2024. This comprised a basic salary, allowances, employer pension contributions and other benefits, including healthcare and non-financial benefits. AlB employees are eligible for inclusion in a variable remuneration scheme based on company performance. Awards are assessed on a combination of financial and non-financial performance. Awards are granted in cash and eligible employees can choose to use their awards to purchase AlB shares under an Approved Profit Share Scheme ("APSS") in the Republic of Ireland and a Share incentive Plan ("SIP") in the UK. AlB ensures that the form of awards complies with regulatory obligations around the nature and form of payments under the plan.

In Goodbody, the annual bonus scheme is fully discretionary and designed to reward high performance while not incentivising excessive risk taking.

The performance of Goodbody MRTs is assessed against a combination of both financial and non-financial measures, and takes into account individual performance, business unit performance and overall Goodbody performance. Awards made in the Goodbody variable pay schemes are subject to consideration for risk adjustment. For some employees, an element of any award may be delivered in shares and / or deferred, and awards may be subject to malus and clawback.

#### Decision-making process for determining remuneration policy

As articulated above, for the vast majority of employees and directors, the remuneration policy applicable during 2024 continued to be constrained by the remuneration restrictions in place. This resulted in limited options being available to the Group and their shareholders during 2024. Goodbody has a separate remuneration policy in place.

## Review of remuneration policy

The Committee conducted its annual review of the Group Remuneration Policy and was satisfied that the Policy was operating effectively and as intended given the remuneration restrictions applicable to most MRTs.

The Committee also considered how executive remuneration aligned to wider employee remuneration, how the Policy aligned to the culture of the Group and its five strategic pillars, and how transparent the Group's remuneration policies and practices were to the wider employee population.

The policy reflects the fact that the remuneration restrictions applying to AIB do not apply to Goodbody. The additional requirements applicable to the minority of MRTs at Goodbody in receipt of variable pay were incorporated into the design of the variable remuneration for these employees.

## Internal control functions

The remuneration of employees in Audit, Risk and Compliance functions is determined independently of the businesses that they oversee. Remuneration is commensurate with their role in AIB and based on performance against objectives linked to their specific functional roles. In line with regulatory guidelines, the remuneration of control functions will predominantly consist of fixed remuneration and the methods used for determining their remuneration will not compromise employees' objectivity and independence.

In the case of Goodbody MRTs in internal control functions, who are eligible for variable pay, this is based on performance against objectives linked to their specific functional roles and is independent of the performance of businesses that they oversee. Their remuneration is predominantly fixed in nature.

## **Guaranteed variable remuneration**

AIB does not award guaranteed variable remuneration to new or existing employees. Remuneration packages to compensate employees for loss of income are made only in exceptional cases where they are necessary to attract and retain highly specialised key staff and are subject to Remuneration Committee approval. Such awards are limited to the first year of employment but payments may be deferred over a number of years. The awards will incorporate retention, deferral, performance, malus and clawback provisions, where considered appropriate and taking into consideration the terms of the awards being foregone from the previous employer.

## Severance pay

Severance payments seek to provide appropriate compensation in cases of early termination of contract and reflect performance achieved over time. They do not reward failure or misconduct and are not awarded where an event has occurred which allows for the immediate cancellation of an employment contract or dismissal of an employee. The Group Remuneration Policy defines the maximum severance pay that can be awarded to an individual and is linked to the number of years of service.

All severance proposals are reviewed individually in accordance with the approved criteria and exit framework to ensure appropriate suitability within the criteria. The Remuneration Committee is made aware of severance payments made to MRTs.

## c) Description of the ways in which current and future risks are taken into account in the remuneration processes

AIB employees are eligible for inclusion in a variable remuneration scheme based on company performance. All variable remuneration arrangements are designed in a way that promotes the interests of AIB's stakeholders and fully complies with applicable regulatory requirements. Irish government remuneration restrictions limit variable remuneration to £20,000 per employee annually. The constraints of the remuneration restrictions in place during 2024, in particular, the inability to offer competitive executive remuneration, represented a key risk to the Group. The Remuneration Committee reviews the Remuneration policy at least annually.

MRTs employed by Goodbody are eligible to receive annual bonus incentives. When awarding performance-based remuneration, the outcome reflects the risks underlying the achieved result and takes into account all types of risk, both current and future risk and crystallised risk events.

Consideration of risk, and any resulting risk adjustment, is a joint process between the control functions and HR, with the final determination of any adjustment being made by the Remuneration Committee incorporating input from the Board Risk Committee.

In considering both current and future risks, a holistic assessment across each material risk of the firm is undertaken by the CRO and Head of Compliance in the first instance. This assessment leverages information from a number of sources and is presented to the Board Risk Committee for its review and assessment to determine if any adjustment is warranted. The Remuneration Committee then makes a determination as to the extent to which bonuses should be reduced to account for risk. This may result in a downwards adjustment to the overall bonus pool and / or adjustments to individual bonus outcomes.

#### d) The ratios between fixed and variable remuneration set in accordance with point (g) of Article 94(1) CRD

In line with regulatory requirements, AIB operates a fixed to variable remuneration ratio of 1:1 (albeit remuneration for employees and MRTs consisted predominantly of fixed remuneration in 2024). A 1:1 ratio also applies to Goodbody.

# e) Description of the ways in which the institution seeks to link performance during a performance measurement period with levels of remuneration

The Group's performance management framework is a key enabler of strategy, putting the Group's brand values at the centre of ongoing conversations about performance, achievement and personal development. The Group's brand values provide the behavioural framework for how employees work, interact with each other and serve the customer. The framework helps to create a high performance culture where strong performance is recognised and poor performance proactively addressed.

The Group's strategic objectives are cascaded down through the organisation to create a link to individual employees' objectives and to enable an understanding of how individual employees contribute to the delivery of the Group's overall strategy.

Performance outcomes for all employees, including MRTs, using a combination of "What" objectives and "How" behaviours, inform individual remuneration and provide a clear link between performance and remuneration.

AIB employees are eligible for inclusion in a variable remuneration scheme based on company performance. It is possible to reduce the level of the award to reflect risk adjustments including but not limited to conduct risk and awards are subject to the Group's provisions on malus and clawback, including where participants leave the Group during the year. The annual pay review process links basic pay increases to individual performance.

MRTs employed by Goodbody, a minority of whom are Group MRTs, are eligible to receive annual bonus incentives. The awards take into account individual performance, business unit performance and overall Goodbody performance.

## Main performance criteria and metrics

As part of the performance assessment framework, an individual's performance is assessed against a combination of both financial and non-financial measures. This includes an assessment of their performance against objectives set at the beginning of the year which reflect the seniority and role of the MRT in question, incorporating both the "What" and the "How", feedback from colleagues and clients and any relevant input from risk and compliance. This helps to reinforce appropriate behaviours and so mitigate operational, consumer and reputational risks.

## Link between performance and individual variable remuneration

AIB employees are eligible for inclusion in a variable remuneration scheme based on company performance. All variable remuneration arrangements are designed in a way that promotes the interests of AIB's stakeholders and fully complies with applicable regulatory requirements. Awards are assessed on a combination of financial and non-financial performance. Awards are granted in cash and eligible employees can choose to use their awards to purchase AIB shares under an Approved Profit Share Scheme ("APSS") in the Republic of Ireland and a Share Incentive Plan ("SIP") in the UK.

A percentage of the profits made by Goodbody is available to create a firm-wide bonus pool. The total amount of performance-based remuneration is based on a combination of the assessment of the individual's performance, that of the business unit concerned, and the firm's overall results. In this way, the firm achieves an appropriate combination of quantitative and qualitative criteria, including financial and non-financial criteria, to ensure that all risks are appropriately reflected. All such awards comply in full with regulatory requirements. If no profits are made, no bonus is paid out under the scheme.

## Determining the instruments awarded

For the AIB variable remuneration scheme, awards are assessed on a combination of financial and non-financial performance. Awards are granted in cash and eligible employees can choose to use their awards to purchase AIB shares under an Approved Profit Share Scheme ("APSS") in the Republic of Ireland and a Share incentive Plan ("SIP") in the UK.

In line with regulatory requirements, it may be the case that employees in Goodbody will receive an element of their variable remuneration in AIB shares. In meeting the requirements to award a proportion of variable pay in instruments, AIB shares were deemed to be the instrument providing the best alignment to the performance of AIB Group.

## Adjustments in the event of weak performance

Any discretionary risk adjustment considered by the Remuneration Committee has the potential to apply to either individuals, teams, business units or AIB as a whole.

## f) Description of the ways in which the institution seeks to adjust remuneration to take account of long term performance

AIB ensures that the form of awards complies with regulatory obligations around the nature and form of payments under the plan. It is possible to reduce the level of the award to reflect risk adjustments, including but not limited to conduct and awards are subject to the Group's provisions on malus and clawback, including where participants leave the Group during the year.

#### Deferral, pay-out in shares, retention periods and vesting

Other than to the extent proportionality can be applied, for Goodbody MRTs at least 50% of variable remuneration awards must consist of shares or other non-cash instruments and at least 40% is deferred over a 3 to 5 year period. Other than to the extent proportionality can be applied, for AIB Group MRTs, at least 40% of any variable remuneration will be deferred over a period of at least 4 years. Further, at least 50% of each of any upfront element and any deferred element will be awarded in AIB shares subject to a 12 month holding period.

#### Ex post adjustments (malus and clawback)

For all AIB Group MRTs and Goodbody MRTs, the Remuneration Committee (the Committee) has the discretion to reduce or impose further conditions on variable pay awards prior to vesting (malus). It also has the discretion to recover incentives after they have vested (clawback). The Committee reviews actual outcomes in the context of underlying business performance and can apply malus and/or clawback to variable remuneration at its discretion.

Malus may be applied to all deferred variable remuneration awarded to MRTs (both AIB Group MRTs and Goodbody MRTs) for the duration of the applicable deferral period.

#### Clawback may be applied:

- For those MRTs in receipt of a deferred element, for the duration of the deferral period plus the holding period:
- For those MRTs not subject to deferral, for a 3 year period.

The Remuneration Committee considers the application of malus and / or clawback where it believes at least one of the following triggers is met:

- · Discovery of a material misstatement resulting in an adjustment in the historical audited accounts of an AIB Group company;
- The discovery that any information used to determine the number of shares was based on error, or inaccurate or misleading information:
- Action or conduct of a participant which amounts to fraud or gross misconduct;
- Events or the behaviour of a participant have led to the censure of an AIB Group company by a regulatory authority or have had a
  significant detrimental impact on the reputation of any AIB Group company provided that the Committee is satisfied that the relevant
  participant was responsible for the censure or reputational damage and that the censure or reputational damage is attributable to
  them:
- · A material failure of risk management;
- · Corporate failure of an AIB Group company;
- Where a participant participated in or was responsible for conduct which resulted in significant losses to the Group;
- Where a participant failed to meet appropriate standards of fitness and propriety;
- Where an AIB Group company or business unit suffers a significant intrinsic downturn in its financial performance;
- Where there are significant increases in an AIB Group company or business unit's economic or regulatory capital base (for example, as a result of regulatory intervention);
- Any other circumstances the Committee considers relevant.

## g) The description of the main parameters and rationale for any variable components scheme and any other non-cash benefit

All variable remuneration arrangements are designed in a way that promotes the interests of AlB's stakeholders and comply with applicable regulatory requirements. Awards are assessed on a combination of financial and non-financial performance. Awards are granted in cash and eligible employees can choose to use their awards to purchase AlB shares under an Approved Profit Share Scheme ("APSS") in the Republic of Ireland and a Share incentive Plan ("SIP") in the UK.

For Goodbody, the total amount of performance-based remuneration is based on a combination of the assessment of the individual's performance, that of the business unit concerned, and the firm's overall results. In this way, the firm achieves an appropriate combination of quantitative and qualitative criteria, including financial and non-financial criteria, to ensure that all risks are appropriately reflected. When awarding performance-based remuneration the firm ensures that the outcome reflects the risks underlying the achieved result and takes into account all types of risk.

# h) Upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management

The required information would be provided if requested.

## i) Use of derogations in Article 94(3) CRD

AIB Group does benefit from the derogation laid down in Article 94(3)(b) CRD because 250 MRTs received variable remuneration in respect of their performance in 2024 which did not exceed €50,000 and which did not represent more than one-third of their total remuneration for 2024. The policies on deferral, pay-out in shares and retention periods were not applied to these individuals. (The vast majority of employees in AIB are subject to an annual limit on variable remuneration of €20,000).

The aggregated 2024 remuneration of the 250 MRTs benefiting from this derogation was:

- total fixed remuneration: €56.2 million
- total variable remuneration: €2.9 million
- total remuneration: €59.1 million

## j) The total remuneration for each member of the management body or senior management.

Quantitative information on the remuneration of the collective management body, differentiating between executive and non-executive members in accordance with Article 450(2) CRR, is disclosed in the templates in these disclosures.

## 70: Template EU REM1 - Remuneration awarded for the financial year

As per Article 450(1), point (h)(i) and (h)(ii) the template below discloses the amounts of remuneration awarded for the financial year, split into fixed remuneration including a description of the fixed components, and variable remuneration, and the number of beneficiaries; the amounts and forms of awarded variable remuneration, split into cash, shares, share-linked instruments and other types separately for the part paid upfront and the deferred part. Variable remuneration predominantly rates to awards made under AlB's variable remuneration schemes and severance payments, in addition to one-off vouchers for eligible employees, with a value of €1,500 or local equivalent. Any remuneration amounts below €50,000 in this template have been reported as 0.

			a	b	С	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed	Number of identified staff	13	2	12	271
2	remuneration	Total fixed remuneration	1.7	1.2	5.6	56.3
3		Of which: cash-based	1.7	1.2	5.6	56.3
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	_	I	1	_
5		Of which: share-linked instruments or equivalent non-cash instruments	_	I	ı	_
EU-5x		Of which: other instruments	_	l	I	_
6		(Not applicable in the EU)				
7		Of which: other forms		l	I	_
8		(Not applicable in the EU)				
9	Variable	Number of identified staff	_	2	10	246
10	remuneration	Total variable remuneration	_	0.0	0.1	4.0
11		Of which: cash-based	_	0.0	0.1	3.8
12		Of which: deferred	_	l	l	0.1
EU-13a		Of which: shares or equivalent ownership interests	_	1	-	0.2
EU-14a		Of which: deferred	_	_	_	0.2
EU-13b	Of which: share-linked instrument equivalent non-cash instruments		_		-	_
EU-14b	Of which: deferred		_	-	_	_
EU-14x	Of which: other instruments		_	I	I	_
EU-14y	Of which: deferred		_			_
15		Of which: other forms	_			_
16		Of which: deferred	_			_
17	Total remunerat	ion (2 + 10)	1.7	1.3	5.7	60.3

# 71: Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

As per Articles 450(1), point (h)(v), (h)(vi) and (h)(vii), the template below discloses the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those awards; the severance payments awarded in previous periods, that have been paid out during the financial year; the amounts of severance payments awarded during the financial year, split into paid upfront and deferred, the number of beneficiaries of those payments and highest payment that has been awarded to a single person.

		а	b	С	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
	Guaranteed variable remuneration awards				
1	Guaranteed variable remuneration awards - Number of identified staff	_	_	_	_
2	Guaranteed variable remuneration awards -Total amount	-	-	_	_
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	_	_	_
	Severance payments awarded in previous periods, that have been	en paid out durin	g the financial ye	ar	
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	-	_	_	_
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	_	_	_	_
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff	_	_	_	5
7	Severance payments awarded during the financial year - Total amount	_	_	_	1.1
8	Of which paid during the financial year	_	_	_	0.9
9	Of which deferred	_	_	_	0.1
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	1	_	_	_
11	Of which highest payment that has been awarded to a single person	_	_	_	0.3

## 72: Template EU REM3 - Deferred remuneration

As per Articles 450(1), points (h)(iii) and (h)(iv) the template below discloses the amounts of deferred remuneration awarded for previous performance periods, split into the amount due to vest in the financial year and the amount due to vest in subsequent years and the amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments. Any remuneration amounts below €50,000 in this template (small amounts of shares for other identified staff which were awarded in a prior performance period and vested in the financial year) have been reported as 0.

		а	b	С	d	е	f	EU - g	EU - h
	Deferred and retained remuneration	Total amount of deferred remuneratio n awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. Changes of value of deferred remuneration due to the changes of prices of instruments)	of deferred remuneration awarded before the financial year actually paid	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	MB Supervisory function	_	_	_	_	_	_	_	_
2	Cash-based	_	_		_	_	_	_	_
3	Shares or equivalent ownership interests	_	_	_	_	_	_	_	_
4	Share-linked instruments or equivalent non-cash instruments								
5	Other instruments	_	_	_	_	_	_	_	_
6	Other forms	_	_	_	_	_	_	_	_
7	MB Management function	_	_	_	_	_	_	_	_
8	Cash-based	_	_	_	_	_	_	_	_
9	Shares or equivalent ownership interests	_	_	_	_	_	_	_	_
10	Share-linked instruments or equivalent non-cash instruments	_	_	_	_	_	_	_	_
11	Other instruments	_	_	_	_	_	_	_	_
12	Other forms	_	_	_	_	_	_	_	_
13	Other senior management	_	_	_	_	_	_	_	_
14	Cash-based	_	_	_	_	_	_	_	_
15	Shares or equivalent ownership interests	_	_	_	_	_	_	_	_
16	Share-linked instruments or equivalent non-cash instruments	_	_	_	_	_	_	_	_
17	Other instruments	_	_	_	_	_	_	_	_
18	Other forms	_	_	_	_	_	_	_	_
19	Other identified staff	2	2	2	_	_	_	2	2
20	Cash-based	_	_	_	_	_	_	_	_
21	Shares or equivalent ownership interests	0.10	0.00	0.00	_	_	_	0.00	0.00
22	Share-linked instruments or equivalent non-cash instruments		_	_	_	_	_	_	_
23	Other instruments	_	_	_	_	_	_	_	_
24	Other forms			_	_	_	_	_	
25	Total amount	0.10	0.00	0.00	_	_	_	0.00	0.00

## 73: Template EU REM4 - Remuneration of 1 million EUR or more per year

As per Article 450(1), point (i) the template below discloses the number of individuals that have been remunerated € 1 m or more per financial year, with the remuneration between € 1 m and € 5 m broken down into pay bands of € 0.5 m and with the remuneration of € 5 m and above broken down into pay bands of € 1 m.

		а
	EUR	Identified staff that are high earners as set out in Article 450(i) CRR
1	1 000 000 to below 1 500 000	_
2	1 500 000 to below 2 000 000	<del>-</del>
3	2 000 000 to below 2 500 000	_
4	2 500 000 to below 3 000 000	_
5	3 000 000 to below 3 500 000	_
6	3 500 000 to below 4 000 000	_
7	4 000 000 to below 4 500 000	_
8	4 500 000 to below 5 000 000	_
9	5 000 000 to below 6 000 000	_
10	6 000 000 to below 7 000 000	_
11	7 000 000 to below 8 000 000	_
12	> 8 000 000	_

# 74: Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

As per Article 450(1), point (g) the template below discloses the aggregate quantitative information on remuneration, broken down by business area. Variable remuneration predominantly relates to awards made under AIB's variable remuneration schemes and severance payments, in addition to one-off vouchers for eligible employees, with a value of €1,500 or local equivalent.

		a	b	С	d	е	f	g	h	i	j
		Manager	ment body remu	ineration		Business areas					
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										298
2	Of which: members of the MB	13	2	15							
3	Of which: other senior management				2	1	_	8	1	_	
4	Of which: other identified staff				63	64	_	57	71	16	
5	Total remuneration of identified staff	1.7	1.3	2.9	17	14.2	_	18.2	15.3	1.4	
6	Of which: variable remuneration	_	_	_	1.3	0.6	_	1.5	0.8	_	
7	Of which: fixed remuneration	1.7	1.2	2.9	15.7	13.6	_	16.7	14.6	1.4	

Chapter 18. Disclosure of encumbered and unencumbered assets

# 75: Template EU AE1 - Encumbered and unencumbered assets

As per Article 443 the template below sets out the encumbered and unencumbered assets. This template represents the median values reported to the regulator over the previous twelve months to 31 December 2024.

		' ' ' ' ' '				Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which: notionally eligible EHQLA and HQLA		of which: notionally eligible EHQLA and HQLA		Of which: notionally eligible EHQLA and HQLA		Of which: notionally eligible EHQLA and HQLA
		010	030	040	050	060	080	090	0100
010	Assets of the disclosing institution	6,657	5,511			131,583	45,076		
030	Equity instruments	0	0	0	0	399	0	399	0
040	Debt securities	4,337	4,278	4,337	4,278	14,277	10,278	14,282	10,282
050	of which: covered bonds	272	272	272	272	4,489	4,489	4,489	4,489
060	of which: securitisations	174	174	174	174	2,352	253	2,352	253
070	of which: issued by general governments	3,738	3,738	3,738	3,738	4,250	4,250	4,252	4,252
080	of which: issued by financial corporations	546	488	546	488	9,162	5,362	9,164	5,363
090	of which: issued by non- financial corporations	62	62	62	62	774	648	774	651
120	Other assets	2,341	1,233			117,089	35,001		

## 76: Template EU AE2 - Collateral received and own debt securities issued

As per Article 443 the template below sets out the encumbered and unencumbered assets of the collateral received. This template represents the median values reported to the regulator over the previous twelve months to 31 December 2024.

				Unencumbered			
			imbered collateral ebt securities issued	Fair value of collateral received or debt securities issued available f encumbrance			
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		
		010	030	040	060		
130	Collateral received by the disclosing	_	_	3,871	364		
140	Loans on demand	_	_	_	_		
150	Equity instruments	_	_	_	_		
160	Debt securities	_	_	3,073	364		
170	of which: covered bonds	_	_	1,001	273		
180	of which: securitisations	_	_	1,560	_		
190	of which: issued by general governments	_	_	91	91		
200	of which: issued by financial corporations	_	_	2,984	273		
210	of which: issued by non-financial corporations	_	_	_	_		
220	Loans and advances other than loans on demand	_	_	830	_		
230	Other collateral received	_	_	_	_		
240	Own debt securities issued other than own covered bonds or securitisations	_	_				
241	Own covered bonds and securitisations issued and not yet pledged			_			
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	6,657	5,511				

## 77: Template EU AE3 - Sources of encumbrance

As per Article 443 the template below sets out the encumbered assets and associated liabilities. This template represents the median values reported to the regulator over the previous twelve months to 31 December 2024.

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	758	1,718

## 78: Table EU AE4 - Accompanying narrative information

As per Article 443 concerning information on encumbered and unencumbered assets of AIB Group.

Row number		Qualitative information
(a)	General narrative information on asset encumbrance	<ul> <li>Asset encumbrance arises from collateral pledged against secured funding and other collateralised obligations. The encumbered assets referenced below will not agree to those disclosed in the AIB Group Annual Financial Report. The reported values represent the median of the values reported to the regulator via supervisory returns over the period 1 January 2024 to 31 December 2024. Whereas the reported values in the AIB Group Annual Report disclosure are as at year end.</li> <li>The asset encumbrance disclosure is consolidated at the group consolidated level excluding those assets pursuant to article 18 of the CRR - see Table 8: EU LI3 - Differences in scope of consolidation.</li> <li>The exposure value used is in line with implementing Regulation (EU) No 2021/451. The median values are</li> </ul>
(b)	Narrative information on	based on quarter end point-in-time (PiT) figures covering the year to 31 December 2024.  • The ability to encumber certain pools of assets is a key element of the Group's liquidity and funding strategy.
	the impact of the business model on assets encumbrance and the importance of encumbrance to the institution's business model, which provides users with the context of the disclosures required in Template EU AE1 and EU AE2.	As part of managing its funding requirements, the Group encumbers assets as collateral to support wholesale funding initiatives. In particular, encumbrance through the repo markets plays a role in funding the Group's investment securities portfolio. The funding of customer loans is also supported through the issuance of covered bonds and securitisations. The Group is required to place cash with the Central Bank of Ireland and the Bank of England to meet minimum reserve and cash ratio deposit requirements which cannot be freely withdrawn. Other lesser sources of encumbrance include cash placed, mainly with banks and central clearing parties, in respect of derivative liabilities and loan collateral pledged in support of pension liabilities in AIB Group (UK) p.l.c.
		• Secured funding between Allied Irish Banks, p.l.c. and other Group entities (e.g. EBS d.a.c. and AIB Group (UK) p.l.c.) is an element of the Group's liquidity management processes. The Group recognises the restrictions on the transfer of liquidity between jurisdictions and separately monitors asset encumbrance by jurisdictions. The Group's ALCo is the governance forum with accountability for reviewing and monitoring the Group's level of asset encumbrance.
		• The Group's wholly owned subsidiary, AIB Mortgage Bank u.c. ('AIBMB'), issues residential mortgage backed asset covered securities ('ACS') in accordance with relevant legislative requirements. The level of over-collateralisation is commensurate with highly rated covered bond issuance. AIBMB is required to maintain minimum contractual over-collateralisation of 5% and minimum legislative over collateralisation of 3% on a prudent market value basis. This is monitored by the Covered Asset Monitor on behalf of the Central Bank of Ireland. AIBMB holds higher levels of assets in their covered pools in order to meet rating agency requirements and beyond this for reasons of operational flexibility. In addition, AIBMB is committed to maintaining an Overcollateralisation Percentage of at least 125%. For this purpose, 'Overcollateralisation Percentage' means the proportion (expressed as a percentage) of the total nominal or principal amount outstanding of the mortgage credit assets and substitution assets comprised in AIBMB's cover assets pool to the total nominal or principal amount outstanding of mortgage covered securities in issue by AIBMB.
		All Group entities repo bonds centrally for liquidity management purposes. Bonds held centrally contribute to the Group's liquidity buffer and do not add to the Group's encumbrance level unless used in a repo transaction or pledged externally.
		• At 31 December 2024, the Group had € 119.9 bn of unencumbered 'Other Assets' of which € 7.5 bn would not be deemed available for encumbrance in the normal course of business and includes intangible assets, tax assets, fixed assets and derivative assets. Encumbered 'Other assets' is mainly made up of encumbered loans and advances of € 1.0 bn and encumbered loans on demand of € 1.3 bn.
		<ul> <li>The 'Carrying amount of selected financial liabilities' that are 'Matching liabilities, contingent liabilities or securities lent' in template EU AE3 is primarily made up of collateral received from derivative counterparties in relation to repurchase agreements and net derivative positions.</li> </ul>

Chapter 19. Disclosure of environmental, social and governance risks (ESG risks)

## 79: Table 1 - Qualitative information on Environmental risk

As per Article 449a CRR, the following table describes the integration of environmental risks, including specific information on climate change risks and on other environmental risks, in AIB Group's business strategy and processes, governance and risk management.

Row number	Qualitative information					
namber		Business strategy and processes				
(a)	Institution's business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution's business environment, business model, strategy and financial planning	AlB continues to support the transition to a low carbon future, building long-term resilience and sustainability for our business, economy and society through our purpose of empowering people to build a sustainable future. Our sustainability strategy is integrated with our overall Group strategy, with Sustainable Communities as a core strategic pillar. It aligns with the Group's three strategic areas of focus, which place an enhanced focus on serving our customer across the Group, greening our business and driving greater operational efficiency. Along with aligning to the Group's strategic ambition, AlB's sustainability strategy is in line with best practice aligned to requirements of the new Corporate Sustainability Reporting Directive ("CSRD") as well as material topics identified through a stakeholder materiality assessment.  Climate and Environmental ("C&E") Risk is established as a Principal Risk for the Group. This encompasses the financial and non-financial impacts on the Group arising from climate change, environmental change and the transition to a sustainable economy. C&E risks can affect the Group directly through our operations or indirectly through our relationships with customers and third party suppliers.				
		Identification and assessment Identification and assessment of C&E Risk is completed in line with the Groups Risk Management Framework as well as other internal processes which consist of top-down and bottom-up approaches. C&E risk comprises physical-, transition- and liability risks, while the impacts can be far reaching in breadth and magnitude over uncertain, often long-term time horizons with dependency on short term action to mitigate. The Group undertakes regular processes for the identification and assessment of C&E impacts, risks and opportunities. These include: Material Risk Assessment (MRA), Risk and Control Assessments (RCAs), Transmission Channel Analysis, Business Environment Scans, 'House Views' on key sectors, compilation of Heatmaps, C&E Stress Testing and regulatory horizon scanning. The outputs from these processes inform areas for focus in the Group's strategic, financial and investment planning processes. Further information on C&E risk assessment can be found on the Sustainability Reporting section of the Annual Financial Report ("AFR").				
		We consider the financial impacts of climate and environment, within two key processes:  a. The financial impact associated with our decarbonisation strategy (i.e., our commitment to be net zero in our own operations by 2030 and in our customer lending portfolios by 2050), focuses on ensuring that our strategy and business model are compatible with the transition to a sustainable economy and in line with the Paris Agreement aim to limit global warming to 1.5°C. Strategic progress against our decarbonisation reference scenarios is tracked and reported through executive and Board governance channels. Steps to align our portfolios with our decarbonisation reference scenarios have been embedded into the Group's formal review and planning processes including the Annual Business Review which forms part of the Strategic, Financial and Investment Planning processes. We require each AIB business area to consider how meeting these targets will impact its projected revenues, costs and margins. We do not expect to make linear progress toward our targets each year, given our reliance on external factors such as policy, regulation, market trends and consumer behaviours. For example, when setting decarbonisation reference scenarios and targets for our Commercial Real Estate and Residential Mortgages portfolios, we have relied on projections set out in the Government's Climate Action Plan regarding building stock shifts from C+ rated properties to AB through obsolescence, new builds and retrofit. We have also considered the projected decarbonisation of the Irish energy grid and the associated decrease in building energy related emissions. Overall, a large portion of our decarbonisation levers are outside our direct control such as government policy and the speed with which the electricity grid transitions to renewables. In addition, to support our decarbonisation ambition, we regularly review and have sharpened the focus of our sustainability strategy across the Environmental, Social and Governance pillars, aligning with our w				

Scenario analysis and stress testing are critical tools to consider how our exposure to C&E risk might evolve under alternative climate change scenarios and short- to long-term horizons, and the financial implications of same. AIB employs a suite of approaches to consider future possible developments. The impact of C&E risk is incorporated in the Group's stress testing framework by conducting a comprehensive scenario analyses to evaluate the potential impact of various climaterelated events on the Group's credit and treasury portfolios, operations and overall financial position. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. The climate stress testing approach and associated models consider the impact of physical and transition risks across a range of scenarios on the Group's Credit exposures. The initial scope of climate stress testing activities and climate modelling in the Group is primarily focused on the credit risk implications for the loan portfolio via both transition and physical risk. This is where the most material impact of climate stresses impacts the Group with the approach covering all customer loans and advances on the balance sheet. As such, aside from the indirect macro impact stemming from the climate scenarios (e.g. interest rate trajectories) direct transmission channels (via other material risks) or direct upstream impacts (e.g. via our suppliers) are excluded from these stress scenarios.

The Group is exposed to the risk that flooding will adversely affect the value of properties collateralising the Group's lending, requiring an increase in credit provisioning to compensate. Following the development of an enhanced flood-risk model to support the quantification of flood-related risks, this was rolled out during 2024 and associated impacts derived. The newly developed model represents a significant step forward in terms of both granularity and flexibility relative to previous approaches (see point (n) below for more detailed information).

The Group is also exposed to transition risk, for example when the uncertainties and challenges associated with a transition to a more sustainable low-carbon economy impacts the creditworthiness of customers (e.g. in climate policy sensitive sectors). The Group quantifies this potential impact using transition risk models centred on carbon emissions charges. Following the development of two new transition risk models, one for Retail (Mortgages) and one for Non-Retail, these models were implemented and rolled out in 2024.

The Business Model, Capital Adequacy Framework and the Stress Testing Policy integrate C&E risks into the Group's stress testing operations. The Group's Stress Testing Policy sets out the key processes, governance arrangements and roles and responsibilities around stress testing in general, including C&E risk impacts.

Over the course of 2024, we have also further developed our approach to nature and progressed integration of nature considerations into both our business strategy and risk management approach. A business environment scan as well as other detailed exercises have been carried out to understand risks to our business as well as areas where AIB and our customers have greatest potential impact on nature and dependencies on specific ecosystem services (e.g. fresh water, soil quality). Following an initial top-down mapping of AIB loan exposures to sectors exposed to nature risk and a further review using the UN's ENCORE tool, our approach has been focused on five sectors in the first instance. The sectors are Energy, Transport, Food & Beverage manufacturing, Real Estate and Agriculture. AIB has also carried out detailed mapping exercises to identify any own premises located in areas of biodiversity sensitivity. Understanding Nature risks, impacts and dependencies is complex. Nature considerations are location specific and often site-specific and best practice continues to evolve as will AIB's approach. We will continue to further develop our approach to more clearly articulate our nature strategy.

(b) Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information about the design of business strategy and processes

## Risk Appetite Statement ("RAS")

Articulation of the Group's C&E risk appetite and tolerance is expressed through the qualitative statements about the nature and type of risk that the Group is willing to accept as well as quantitative RAS metrics that define the range of acceptable risk. Qualitative statements and quantitative metrics are linked to material C&E risk drivers as identified through the Group's materiality assessment. The 2024 materiality assessment showed that main impacts are expected to materialise in the areas of Credit Risk and Operational Risk. This has been reflected in the development of RAS metrics. In 2024 we reviewed the RAS metrics and approved the C&E Risk RAS metrics for 2025, which include three C&E qualitative statements that help articulate appropriate areas of climate-related risk appetite. In addition to this, the Group has approved six new quantitative C&E RAS metrics, ensuring coverage across physical, transition and environmental risks (bringing the total number of C&E related metrics to nine). The RAS metrics are cascaded to segments and subsidiaries as appropriate.

#### **Financed Emissions Reduction Targets**

Through our purpose of empowering people to build a sustainable future, we are committed to building long-term resilience and sustainability for our business, economy and society. In 2020, AIB made decarbonisation commitments to be net zero in our own operations by 2030 and in our customer lending portfolios by 2050. AIB has established decarbonisation reference scenarios based on 2021 baselines for its three most material sectors (i.e., loan portfolios with highest transition risk), namely: Residential Mortgages, Commercial Real Estate, and Electricity Generation and a fourth Corporate Portfolio Coverage Target. We have validated financed emissions targets aligned to a 1.5°C scenario set for 75% of the 2021 AIB loan book and in 2023 were the first bank in the world to receive an SBTi approved maintenance target for electricity generation. Progress towards the achievement of our targets will help us mitigate Climate & Environmental risks, achieve our decarbonisation ambition and increase our sustainable lending. Strategic progress against decarbonisation reference scenarios is tracked and reported through executive and board governance channels with portfolio steering recommendations where appropriate.

Our validated Science Based Target initiative ("SBTi") targets use a decarbonisation reference scenario that aims to limit global warming to 1.5°C. This ambition is considered alongside external interdependencies, requiring careful balance between strategic and transition risks. The world is not on track to limit global warming to 1.5°C, with the latest climate science suggesting a trajectory of greater than 2°C warming. This trajectory gap between global ambition and reality is also visible in AIB's year on-year performance against certain targets. While it is important to communicate clearly and transparently, to promote stakeholder awareness of this gap, we will not allow this to inhibit our efforts to reduce our financed emissions and will continue to support our customers along the transition. We do not expect to make linear progress toward our targets each year, given our reliance on external factors such as policy, regulation, market trends and consumer behaviours. For example, when setting decarbonisation reference scenarios and targets for our Commercial Real Estate and Residential Mortgages portfolios, we have relied on projections set out in the Government's Climate Action Plan regarding building stock shifts from C+ rated properties to AB through obsolescence, new builds and retrofit. We have also considered the projected decarbonisation of the Irish energy grid and the decrease in building energy related emissions that would result. Overall, a large portion of our decarbonisation levers are outside our direct control such as government policy and the speed with which the electricity grid transitions to renewables. C&E Risk Appetite Statement (RAS) metrics are in place which track performance against new lending targets which support transition aligned to our financed emissions targets.

## Residential Mortgages

In 2021, we established a baseline physical emissions intensity of 40 kgCO2e/m² for our Residential Mortgages portfolio, utilizing the International Energy Agency (IEA) 2021 NZE2050 1.5°C Sectoral Decarbonisation Approach ("SDA") Scenario to set a physical emissions intensity reduction target of 58% by 2030. The scope of our target reflects total lending within our Residential Mortgages portfolio, which was €29.4bn in 2021, representing 50% of the Group's total lending at that time. By 2024, our Residential Mortgages portfolio had increased to 51% of the Group's total lending, with a total of €36.3bn. In 2024, the physical emissions intensity of our Residential Mortgages portfolio decreased by approximately 7%, compared to our 2021 baseline. AIB remains committed to investing in residential mortgage products and propositions to support the achievement of our targets.

#### Commercial Real Estate ("CRE")

In 2021, we established a baseline physical emissions intensity of 135 kgCO2e/m<sup>2</sup>, utilizing the International Energy Agency (IEA) 2021 NZE2050 1.5°C SDA Scenario to set a physical emissions intensity reduction target of 67% required by 2030. The scope of our target reflects total lending within our CRE portfolio of €5.6bn in 2021, 10% of the Group's total lending. Throughout 2024, we undertook a process to enhance the quality of our data alongside our decarbonisation models and methodologies, reflecting our commitment to more accurately measure emissions to strategically guide our portfolio. As a result of this effort, we are revising our 2021 baseline from 135 kgCO2e/ m2 to 116 kgCO2e/m2, while maintaining our current IEA pathway. This adjustment allows us to present a more accurate representation of our progress to date while retaining our emissions reduction target of 67% by 2030. In 2024, our CRE portfolio accounted for 8% of the Group's total lending, with total lending increasing to €5.7bn. In 2024, the physical emissions intensity of our CRE portfolio reduced by approximately 8% compared to our 2021 restated baseline. We are competitive in the CRE sector in our home market, with our commitment to sustainability a key differentiator. CRE is also an important sector to us because of the social impact of our business. We work with developers and housing schemes and through the provision of finance, we have a positive social impact by increasing the housing supply in Ireland.

### **Electricity Generation**

AIB's Electricity Generation portfolio has a significantly low emissions intensity relative to the global average for electricity generation 458 gCO2e/kWh in 2024, given the high share of renewable energy assets such as offshore wind. In 2021, we established our baseline maintenance target of 21 gCO2e/kWh for our Electricity Generation portfolio, which includes lending to renewable energy projects and waste-to-energy initiatives. The scope of our baseline and target reflects total lending within our Electricity Generation portfolio of €1.6bn in 2021, comprising 3% of the Group's total lending. Since setting our maintenance target, waste to energy has been excluded from the Electricity Generation target scope following bilateral guidance received from SBTi. This is primarily due to the fact that waste-to-energy facilities are not based on fossil fuels, and electricity generation is not their main purpose or revenue source. Consequently, the baseline emissions intensity decreased significantly from 21 gCO2e/kWh to 0.01 gCO2e/kWh. Note that, financed emissions related to waste to energy will continue to be tracked against our maintenance target internally. In 2024, the portfolio was 5% of total lending €3.6bn, with emissions intensity of 0.97 gCO2/kWh. We are committed to maintaining the emissions intensity level of the Electricity Generation portfolio below 21 gCO2e/kWh through 2030 by keeping the portfolio focused on renewable electricity generation projects. In addition, we intend to grow AIB's business in renewable energy infrastructure to support the broader transition to a sustainable future.

## Corporate Portfolio Coverage:

In 2021, we established a target to increase our corporate portfolio loan volumes covered by emission targets from 12% to 54% by 2030 from a 2021 baseline. In 2024, we increased our Corporate Portfolio Coverage to 27%. Our Corporate Portfolio Coverage target considers large corporations with >500 employees that have SBTi validated targets. The percentage of customers with SBTi-validated targets set is expected to steadily increase in the coming years as new regulations around transition plan disclosures come into force. Key sectors should decarbonise in line with the Government's Climate Action Plan 2024 or equivalent plans in other jurisdictions outside Ireland and corporate customers with >500 employees are expected to set their own emissions targets in the medium term.

## Physical Risk

The Group has identified flooding as the most material physical risk to the Group. The Group is exposed to the risk that flooding will adversely affect the value of properties collateralising the Group's lending, requiring an increase in credit provisioning to compensate. An enhanced flood-risk model to support the quantification of flood-related risks and associated impacts was developed and rolled out during 2024. The newly developed model represents a significant step forward in terms of both granularity and flexibility relative to previous approaches.

As a first step, the new model locates individual properties and overlays a series of flood maps corresponding to river, coastal and surface water flood events. This is repeated for multiple return periods (1-in-20-year, 1-in-1000 year) allowing for a probability distribution of flood levels to be calibrated for each property. The damage to each property for a given level of flooding is estimated based on building type and flood type. Estimates of rebuild costs are applied to calculate the cost of repair.

With this approach, the model can be used to quantify flood-damage impacts across a probability distribution of flood severities and, from this, estimate "Expected Annual Damage" as the probability-weighted-average of flood-damage costs. This approach can be applied to reflect current climate conditions or projected climate conditions under a variety of science-based scenarios developed by the IPCC (Intergovernmental Panel on Climate Change).

The model is used to quantify flood risk under a range of climate scenarios including high-emissions scenarios for horizons out to 2055. Consequently, the model supports the Group's Internal Capital Adequacy Assessment Process ("ICAAP") and stress testing more generally which, in turn, informs assessments of the materiality of flood risk in the short, medium and long term such that, if required, mitigating actions can be taken in a timely manner. The ICAAP is the Group process to ensure adequate capital resources are maintained at all times, having regard to the nature and scale of its business and the risks arising from its operations.

Our approach is subject to further evolution based on industry developments and supervisory and regulatory expectations which will continue to evolve over time.

#### Own operations

In supporting our customers in the transition to a sustainable future, we are ever mindful of our own carbon footprint, including entities in our upstream value chain. We have a clear ambition to reach net zero in our own operations while sourcing 100% of electricity from certified renewable energy sources by 2030.

We have an SBTi validated target to reach net zero for Scope 1 and Scope 2 emissions in our own operations by 2030. We use 2019 as the baseline year, which has undergone a process of normalisation. The baseline values which the target is measured against are 4,784 tCO2e for Scope 1 and 1% renewable energy for Scope 2. AIB has an interim target to reduce absolute Scope 1 GHG emissions by 34% by 2027. In 2024, AIB's cumulative reduction in Scope 1 emissions was 40%.

We had previously purchased electricity on green tariffs. However, in 2022 we entered into a virtual Corporate Power Purchase Agreement (VPPA) with NTR plc to create two new solar farms in Co. Wexford. Construction began swiftly and the first solar farm started energisation in February 2024. These two solar farms will deliver certified renewable energy to the Group. In 2024, 84% of AIB's own electrical energy needs was produced from these Solar Farms. This action is instrumental to meeting our renewable electricity sourcing target of 100% by 2030. The agreement also ensures the Group has a sustainable and secure energy supply at a fixed price for 15 years and will continue to reduce our operational carbon emissions.

Due to the nature of AIB's approach taken and the nature of our business, we have set a target of increasing our annual sourcing of renewable electricity needs. In this regard, our scope 2 target is to increase annual sourcing of renewable electricity to 100% by 2030. The targets have used assumptions around availability of renewable energy in Ireland and the UK and the changes within our estate over the period. As we approach the midpoint of our target delivery period we will take the opportunity to consider future developments and how these will impact on our target by 2030. When setting these targets stakeholders across the business were engaged with through consultation. This target is relative and measured as a percentage reduction in emissions.

We have implemented and regularly review several Board-approved policies and frameworks to enable this journey, along with targets and actions to achieve them.

- Our Group Energy Policy outlines how we conduct our business and operations as energy efficiently as possible, striving to achieve continual improvement in our energy performance and Energy Management System. This policy is managed and controlled through the implementation of Energy Management Standard ISO 50001.
- Our Group Environmental Policy aims to support us to meet our current needs without compromising the ability of future generations to meet their own needs. This principle of sustainable development demands that we accept responsibility for the direct impact of our own operations on the environment. The policy also commits us to supporting initiatives aimed at mitigating, adapting or responding to climate change. AIB takes environmental action into account in accordance with international standard ISO 14001.

Over the course of 2024, we have also also carried out detailed mapping exercises to identify any own premises located in areas of biodiversity sensitivity. We continue to develop our approach to C&E to more clearly articulate our nature strategy and to integrate nature considerations into both our business strategy and risk management approach.

For more information on the objectives, targets and limits for the assessment and management of environmental risks, please see sections 1(e) and 1(q) below.

(c) Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities

AlB's €30bn Climate Action Fund supports lending through a range of green and transition products and propositions, enabling customers to reduce emissions and help make a positive environmental impact. While many banks are focused on reducing their exposure to carbon-intensive activities, we believe that we can have the greatest positive impact by mobilising significant capital towards renewable power generation and sustainable infrastructure. To direct more finance towards climate action initiatives, we launched a Climate Capital segment in 2023 which became fully operational in 2024. We have made significant resources available to support the new segment, creating a step change in our ability to finance energy transition and ESG infrastructure. We support the United Nations (UN) Sustainable Development Goals (SDGs) and while we support all 17 UN SDG's, we believe we can continue to make, a sustained and scalable contribution to SDG-13 'Climate Action'.

We recognise we have a long-term role to play in providing the finance required to transition to a sustainable economy. When our Climate Action Fund was initially launched in 2019, we had an ambition to lend €5bn over a five-year period. Due to exceptional demand, this doubled to €10bn in 2021 with an increase to €30bn by 2030. This fund is realised through the Group's various green and transition products for personal, small and medium-sized enterprises ("SME") and corporate customers in Ireland, the UK and further afield, and focuses on energy, climate and infrastructure projects. Since 2019, we have provided €16.6bn of green lending, and in 2024 35% of our new lending was classified as green. Delivering for our customers whilst steering finance towards green and transition activities is an important way in which we can support the transition to a more sustainable future. Our dedicated green financing segment, Climate Capital, complements our other segments – Retail Banking, Capital Markets and AIB UK – and focuses on funding renewable energy assets and ESG infrastructure projects across North America, UK and Europe. We have an ambition that 70% of our lending will be green and transition in 2030 and will continue to offer green products and propositions to meet our customers' needs

In recent years the Group's ESG bond issuance has supported €6.4bn of green and social collateral, with €0.65bn of that issued in 2024. Of the €6.4bn in ESG Bonds issued to date, €4.65bn of these are green bonds These proceeds contribute to the financing of projects with clear environmental and climate action benefits, while further strengthening the Bank's capital position. Our Socially Responsible Investment (SRI) Bond portfolio funds domestic and international projects aimed at global sustainability, carbon emissions reduction and social improvement, all under the overarching themes of ESG. AIB promotes and supports the transition to a more sustainable global economy and contributes to positive environmental and social change via investment in green, social and sustainable bonds. The SRI Bond portfolio reached €2.67bn at year-end 2024.

The Group has implemented several Board-approved policies and frameworks, which are monitored on an ongoing basis. Two key policies and frameworks which facilitate green and transition lending and support the decarbonisation are the Sustainable Lending Framework (SLF) and Green Bond Framework (GBF). The SLF provides transparency on the criteria that we employ in classifying and reporting on green, transition and social lending, to help us achieve our ambition that 70% of new lending should be green or transition by 2030. The policy is a Group wide framework and is available on the AIB website. Lending across all of our business units and geographies is in scope of the SLF. It supports our sustainable lending to energy efficiency and renewable energy development. We developed and implemented the SLF in July 2021 to comply with the European Banking Authority guidelines on Loan Origination and Monitoring. The guidelines defined in the SLF to classify new lending as Green or Transition lending aim to be aligned to the extent possible with the technical criteria outlined in the EU Taxonomy regulation for relevant activities. As further work is completed to consider the full implications of reporting under the EU Taxonomy, and in particular the Green Asset Ratio, we expect our approach to evolve and mature.

The Group's GBF enables AIB to fund projects that support climate change mitigation and the transition to a circular economy. The purpose of the GBF is to support AIB, and its subsidiaries, in the issuance of green bond instruments, which may include covered bonds, senior bonds (preferred or non-preferred), subordinated bonds, medium-term notes, and commercial paper, to finance and/or refinance eligible green loans with a positive environmental benefit. AIB's green bonds fund eligible projects or assets that mitigate climate change by reducing emissions, protecting ecosystems, or have a positive environmental impact. Eligible projects include renewable energy generation, transmission and storage, green buildings, circular economy and waste management assets, and clean transportation. Our GBF is based on the ICMA Green Bond Principles 2021, including the updated Appendix I of June 2022, and defines the portfolio of loans eligible to be funded by the proceeds of Green Bonds issued by AIB. The GBF is publicly available on our website.

Achieving our purpose of empowering people to build a sustainable future and delivering on our decarbonisation ambitions is a multiyear programme, requiring appropriate funding, and resourcing. The transition to a sustainable future will require significant investments over the coming decades and the financial services sector has a key role to play. AIB will lead by example and where possible support our customers along their transition pathway by financing energy efficiency measures and providing loans to business and individuals who are transitioning to a low-carbon economy.

Our Sustainability Transformation programme also continues to oversee our transformation as we embed sustainable practices across our business. The programme includes delivery of key strategic objectives and regulatory expectations.

(d) Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks

The Group has implemented several Board-approved policies and frameworks, which are monitored on an ongoing basis. C&E Risk is actively managed through the C&E Risk Framework and Policy. The C&E Risk Framework sets out the principles, roles and responsibilities, governance arrangements and processes for C&E risk management across the Group. The Framework sits within the overall group risk architecture and is one of the material risk frameworks supporting the Group's Risk Management Framework.

The C&E Risk Framework is underpinned by the C&E Risk Policy, ensuring that C&E risk is managed in line with the Group's overall purpose, the five key strategic pillars, as well as the Group's strategic objectives. The C&E Risk Framework and Policy went live in Group on 1 March 2024, and was approved and adopted by subsidiaries during the year. Both were further updated and approved through appropriate governance fora in December 2024. The changes reflect the maturing approach to C&E Risk management providing greater clarity on roles and responsibilities, due diligence, monitoring and reporting.

Due to the pervasive nature of C&E risk and its potential impact on other principal risks, the C&E risk management aspects for these principal risks are incorporated within their relevant risk frameworks and policies. In 2024, a number of updates were made across the principal risk policies and frameworks to enhance the management, measurement, mitigation and reporting of C&E Risks. These updates covered financial risk, model risk, regulatory compliance, operational risk (both own operations and third party providers) and credit risk. These include additional requirements for C&E Risk information and enhancements to systems to processes to enable systematic capture of this data.

The ESG Questionnaire continues to be used in credit applications for borrowers identified as carrying relatively high transitional, environmental, social and/or governance related risk where the new lending is over €/£ 1 million. A transition risk heatmap is used to identify those sectors facing the highest transition risk that are in scope for the questionnaire. The questionnaire has both generic and sector specific questions on a range of topics from Climate & Environmental risk specific matters to social considerations such as human rights and diversity to determine an ESG risk rating. The questionnaire provides a better understanding of the ESG risk associated with the borrower and creates awareness among customers of the data that will be required from them around where they are in their ESG journey and their plans going forward. The output from the ESG questionnaire is an additional factor for consideration in the credit decisioning process.

AIB have had an excluded activities list in place since 2020, which sets out a range of business activities that do not align with our Group strategy. From a sustainability perspective, excluded activities include the exploration, extraction and upgrading of oil sands projects, nuclear power generation, nuclear waste transportation, and the decommissioning and/or final disposal of high level nuclear waste. Our rules apply to all business customers with a Gross Connected Exposure of >£/€300k and who are relationship managed, prohibiting us from providing them with new money when their activities are covered by this list. The list of excluded activities is publicly available at www.aib.ie/sustainability

The Group Project Finance Policy guides renewable energy lending assessments and decisions for long-term infrastructure, industrial projects and public services. Within credit assessment due diligence, assets that are likely to have significant effects on the environment by virtue of their size, nature or location must undergo an environmental impact assessment ("EIA"), which will have to be submitted to competent authorities when applying for project development. AIB may rely on analyses provided by external parties to support our assessment. Our policy was approved by our Group Credit Committee.

The AIB Group Responsible Supplier Code sets out our expectation that our suppliers conduct their business in a fair, lawful, and honest manner with all their stakeholders, employees, subcontractors and any other third parties. It sets out our expectations of suppliers and the minimum standards they must meet on human rights, health and safety, supply chain, inclusion and diversity, and responsible and sustainable business. AIB suppliers must adhere to all legal obligations in each jurisdiction in which they operate or provide services, as well as any specific requirements included in our own policies. Key suppliers must attest annually to key policies (or clauses in them that are relevant to our supply chain). These include our Code of Conduct, Conflicts of Interest policy, Anti-Bribery & Corruption policy, Data Protection policy, Speak Up policy and our Human Rights Commitment. AIB also encourage our suppliers to report their carbon emissions through the Carbon Disclosures Project. Our code was endorsed by our Chief Executive Officer. The AIB Group Responsible Supplier code is publicly available on our suppliers portal at www.aib.ie/suppliers.

ESG factors are increasingly important for our own performance, and for our relationships with suppliers. The ESG Questionnaire covers a broad range of ESG areas, and requires responses and evidence from suppliers on their

- journey to establishing or achieving their net zero targets;
- annual sustainability reports;
- Scope 1,2 and 3 GHG emissions;
- consideration of physical risks from climate change;
- policies on discrimination, inclusion & diversity, health & safety, modern slavery, vulnerable persons, greenwashing, and speaking up;
- Code of Conduct and their Responsible Supplier Code for their own supply chain;
- commitment to ongoing ESG-related training in their organisation

By engaging with our suppliers through the ESG questionnaire during the selection process, we benefit in the following ways:

- 1. Aligning our values and expectations with our suppliers
- 2. Identifying risks and opportunities of our suppliers and their supply chains
- 3. Providing a baseline for measuring and monitoring suppliers' ESG performance and progress, as well as a roadmap for improvement.

AIB will continue to support transition efforts that are aligned with our strategy and decarbonisation ambitions and engage with organisations to ensure we can support positive change and help mitigate and reduce environmental risk. To help drive this agenda, we have joined a multitude of voluntary organisations, including the Carbon Disclosure Project (CDP), Science Based Targets Initiative (SBTi), Net Zero Banking Alliance (NZBA), UN Global Compact, and the World Banking Council for Sustainable Development (WBCSD). We also participate in and provide thought leadership and knowledge sharing sessions. The eighth AIB Sustainability Conference opened Ireland's Climate Finance Week in November 2024. With 11,481 hybrid attendees, it was the largest event to date, hosting impactful conversations with global figures. AIB's customer panel discussions also provided an opportunity for our customers and other attendees to understand how they can act, regardless of size or industry, and be part of the solution. We also collaborate with our customers by advising them on their transition pathway through dedicated sustainability champions, an in-house Sustainability Research function, customer events and webinars and an enhanced sustainability advisory services offering via Goodbody Clearstream.

Educating customers is central to supporting their transitions, as well as deploying our Climate Action Fund, achieving our green and transition lending targets, our financed emissions reduction targets and reducing C&E risk. We also have dedicated educational resources, available on our website, to support our customers in building a more sustainable future, such as: Sector Sustainability Guides and the AIB Green Living Hub. Additionally, our commitment to educating our customers is reflect in our 'SME Steps to Sustainability' resource for SME businesses to guide them to take sustainable action. We developed this in 2024 following conversations with SME customers and in partnership with many colleagues supporting SMEs across AIB. We also publish reports on our website of research carried out, such as the AIB Homes Retrofit Report, which highlights retrofit options, generous grants and competitively priced loans available to consumers wishing to improve their homes' energy efficiency. Our colleagues must also upskill on sustainability matters, with a mandatory requirement for all to complete the 'Sustainability and AIB' online course every year, which gives both context and colour to our sustainability strategy. We also provide a course on 'Understanding ESG for Business Customers', in partnership with the Institute of Bankers, for colleagues. This gives an overview of the particular challenges and opportunities facing businesses.

In 2024 at our Sustainability Conference, we announced the €20mn investment in sustainability education and research, with €10mn allocated to a new AIB Trinity Climate Hub in Trinity College Dublin and a €10mn commitment as founding partner of Innovate for Ireland (to fund PhD-level research).

Quality education and knowledge play a critical role in creating strong, resilient economies and societies. The transition to a low-carbon future creates real opportunities for learning and innovation. The work undertaken by the AIB Trinity Climate Hub, alongside our partnership with Innovate for Ireland, will benefit society and shape a better future for us all.

#### Governance

(e) Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of environmental risk management covering relevant transmission channels

The AIB Group Board is responsible for promoting the Group's long-term sustainable performance, which includes the consideration of ESG and climate factors. It approves the Group's strategy and our financial and investment plans, which includes considering sustainability factors. The Board approves our sustainability targets as part of the strategic planning process. These targets then form part of the financial planning process across our core operating segments. The Board receives regular updates on the execution of the Group's sustainability strategy, enabling it to monitor performance against the sustainability targets. These reports include regular updates on people and culture, bi-annual sustainability updates, and updates on Green Bond and Social Bond transactions. The Board is also responsible for overall business conduct. Our Board-approved Code of Conduct supports the Group's values and helps us to deliver our Group strategic purpose. It ensures that an appropriate system of internal controls is maintained and established the Sustainable Business Advisory Committee to assist the Board in overseeing sustainability matters and support the execution of the Group's sustainable business strategy, in accordance with the Group Strategic and Financial Plan.

Our sustainability strategy is integrated with our overall Group strategy, with Sustainable Communities as a core pillar. It aligns with the three strategic areas of focus, which place an enhanced focus on serving our customers across the Group, greening the business and driving greater operational efficiency. The Board receives updates regarding the execution of the Group's sustainability strategy, including the quarterly Group Balanced Scorecard, bi-annual sustainability updates and updates on both green bond and social bond transactions. The Board is supported in discharging its duties by a number of Board and Advisory Committees. For more information on these committees please refer to Table 1(g).

The Group's Governance and Organisation Framework encompasses the leadership, direction and control of the Group, reflecting policies, guidelines and statutory obligations. This ensures that control arrangements provide appropriate governance of the Group's strategy, operations and mitigation of related material risks. This is achieved through a risk governance structure designed to facilitate the reporting, evaluation and escalation of risk concerns from business segments and control functions to the Board and its appointed committees and subcommittees. For more information, please refer to the Risk Governance and Oversight section of the Annual Financial Report.

The Group uses a comprehensive risk management approach across all risk types. This is outlined in the Group's risk management framework, including the key practices that are implemented in managing risks, both financial and non-financial. The framework is reviewed, updated and approved by the Board at least annually to reflect any changes to the Group's business or consideration of external regulations, corporate governance requirements and industry best practice. The Group's independent Risk function designs and maintains the framework. The Risk function is led by the Chief Risk Officer who provides oversight and monitoring of all risk management activities.

As mentioned in 1(a), as of 31st December 2024, C&E risk is a principal risk for the Group. The Group continued to embed the risk management of C&E during 2024 through enhancements to the C&E Risk Heatmaps and Stress Testing Framework including the development of transition risk and physical risk models, and the incorporation of environmental sector specific considerations within the Group's credit risk policies. The Group has approved six new quantitative C&E Risk Appetite Statement ("RAS") metrics, ensuring coverage across physical, transition and environmental risks (bringing the total number of C&E related metrics to nine).

Management and measurement

C&E Risk is actively managed through the C&E Risk Framework and Policy. The C&E Risk Framework sets out the principles, roles and responsibilities, governance arrangements and processes for C&E risk management across the Group. The Framework sits within the overall group risk architecture and is one of the material risk frameworks supporting the Group's Risk Management Framework.

The C&E Risk Framework is underpinned by the C&E Risk Policy, ensuring that C&E risk is managed in line with the Group's overall purpose, the five key strategic pillars, as well as the Group's strategic objectives. The C&E Risk Framework and Policy went live in Group on 1 March 2024, and was approved and adopted by subsidiaries during the year. Both were further updated and approved through appropriate governance fora in December 2024. The changes reflect the maturing approach to C&E Risk management providing greater clarity on roles and responsibilities, due diligence, monitoring and reporting.

Due to the pervasive nature of C&E risk and its potential impact on other principal risks, the C&E risk management aspects for these principal risks are incorporated within their relevant risk frameworks and policies. In 2024, a number of updates were made across the principal risk policies and frameworks to enhance the management, measurement, mitigation and reporting of C&E Risks. These updates covered financial risk, model risk, regulatory compliance, operational risk (both own operations and third party providers) and credit risk. These include additional requirements for C&E Risk information and enhancements to systems to processes to enable systematic capture of this data.

Our decarbonisation targets are embedded into the Group's formal review and planning processes including the Annual Business Review which forms part of the Strategic, Financial and Investment Planning processes. Progress towards the achievement of our targets will help us mitigate Climate & Environmental risks, achieve our decarbonisation ambition and increase our sustainable lending. Strategic progress against decarbonisation reference scenarios is tracked and reported through executive and board governance channels with portfolio steering recommendations where appropriate. Reporting on progress is integrated into our Strategic Outcomes report, CFO and CRO reports as well as Group Sustainability Committee (GSC) reporting. We publicly disclose our progress against these targets on an annual basis.

(f) Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure both within business lines and internal control functions

Three lines of defence model

The Group operates a three lines of defence model which defines clear responsibilities and accountabilities and ensures effective independent oversight and assurance activities take place covering key decisions.

- The first line of defence lies with the business line who are required to have effective governance and control frameworks in place for their business and to act within the risk appetite parameters set out.
- The second line of defence comprises the Risk function, and oversees the first line, providing independent constructive challenge, setting the frameworks, policies and limits, consistent with the risk appetite of the Group.
- The third line of defence comprises Group Internal Audit who provide an independent view on the key risks facing the Group, and the adequacy and effectiveness of governance, risk management and the internal control environment in managing these risks.

The Board and its sub committees, the Board Risk Committee ('BRC') and Board Audit Committee ('BAC') are ultimately responsible for ensuring the effective operation of the three lines of defence model. They are supported by the Executive Committee ('ExCo') and its subcommittees. The Terms of References for the BRC and BAC are available on the Group's website.

Please see section 1(j) below for more detail on the integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework.

(g) Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels

Integration of measures | Please refer to part 2 (f) where the Group's three lines of defence model is discussed.

The AIB Group Board is supported in discharging its duties by a number of Board and Advisory Committees. Part of their role is to oversee and challenge the Group's sustainability strategy and performance, while the Board retains ultimate responsibility, ensuring a robust approach.

## Sustainable Business Advisory Committee ("SBAC")

The SBAC assists the Board in overseeing sustainability matters and supports the execution of the Group's sustainable business strategy, in accordance with the Group Strategic and Financial Plan.

#### Board Risk Committee ("BRC")

The Board Risk Committee (BRC) oversees and fosters sound risk governance across the Group, including ESG related risks. The BRC receive updates from the ExCo members following review at GRC, including the effectiveness of policies and programmes, which relate to identifying, managing and mitigating ESG risks, in connection with the Group's operations and ensuring compliance with regulatory requirements and industry standards.

## Board Audit Committee ("BAC")

The Board Audit Committee (BAC) oversees the quality and integrity of the non-financial disclosures, internal controls and mechanisms through which employees and contractors may raise concerns in line with the scope of the Whistleblowing Policy.

## Executive Committee ("ExCo")

The ExCo is led by the CEO and includes the managing directors of our four core operating segments. It provides input on the design, development and delivery of our purpose, strategy and values, and is responsible for our day-to-day operations. The ExCo ensures we have an effective organisational structure, including the selection, motivation and direction of senior management, and oversees the execution of the strategy agreed with the Board, as well as the operational management, compliance and performance of all of the Group's businesses.

The ExCo is also responsible for maintaining an effective internal governance and control framework that includes a clear organisational structure and independent risk management, compliance and audit functions. In addition, it evaluates the effectiveness of the systems that ensure the integrity of our financial and sustainability information, as well as the soundness and effectiveness of risk management and internal controls.

ExCo operates under defined Terms of Reference and has full authority to delegate any of its powers, authority or activities to identified executives or to one or more of its sub-committees. In line with this, ExCo has established several sub-committees. The Chair of each sub-committee reports to ExCo on the key aspects of its work. ExCo oversees the sub-committees and regularly evaluates their effectiveness.

## Group Sustainability Committee ("GSC")

The GSC is chaired by our Chief Sustainability Officer. Its remit includes the effective fulfilment of strategic objectives and regulatory obligations, and our data strategy as it relates to ESG disclosures. It reviews and assesses current and emerging ESG risks, interacting with the Group Risk Committee on relevant matters. It also maintains relationships with key sustainability and ESG stakeholders and ensures that the Group's portfolio of ESG products aligns to its sustainability agenda and strategy. The GSC oversees internal and external communications with stakeholders on the Group's approach to ESG matters. The SBAC receives updates from the GSC on sustainability related matters, including the approval of the Sustainability Strategy. Additionally, the GSC manages and oversees the Double Materiality Assessment process. The outcome of the DMA and any subsequent updates to it are communicated to SBAC and BAC on an annual basis.

## Group Risk Committee ("GRC")

The GRC is the senior management risk committee and is accountable to the Executive Committee for setting policy and monitoring all risk types across the Group, to enable delivery of the Group's risk strategy. As part of this process, it receives updates on the effectiveness of the Group's policies and programmes related to identifying, managing and mitigating the Group's ESG risks, including Climate and Environmental Risk, and ensuring compliance with regulatory requirements and industry standards. The GRC also approves the Climate and Environmental Policy. The BRC receives updates from the ExCo members following review at GRC, regarding the effectiveness of policies and programmes, which relate to identifying, managing and mitigating ESG risks, in connection with the Group's operations and ensuring compliance with regulatory requirements and industry standards.

Group Disclosure Committee ("GDC") The GDC oversees material Group disclosures. This includes recommending the disclosures in the sustainability statement for the BAC to review, ahead of recommendation to the Board for approval. As part of this, the GDC reviews the key judgements and estimates applied to sustainability disclosures, following their consideration by GSC, as well as the clarity and consistency of GSC's recommended response to new legal and regulatory requirements impacting Group ESG disclosures. Group Conduct Committee ("GCC") The GCC is responsible for fostering sound risk governance, ensuring that conduct-related risks are properly identified, assessed, controlled and reported and that our strategy is consistent with our risk appetite. Data, Analytics and Technology Committee ("DATC") The DATC is responsible for the governance, oversight and approval of all material aspects of the Group's data and technology activities, including the technology, data and analytics strategy, data quality, cyber, ethics and privacy standards. Lines of reporting and C&E Risk – monitoring, escalating and reporting (h) frequency of reporting C&E risk is monitored through internal and external reporting across the Group. The primary relating to internal risk report, the CRO report, dedicates a section to C&E risk providing the GRC and the BRC environmental risk with relevant updates on the C&E risk profile. The profile section encompasses the key developments around the risk, planned initiatives and also reports on the Group's performance against risk appetite and against other Key Risk Indicators. Monitoring and reporting of the C&E quantitative RAS metrics is conducted monthly. The escalation process, as stipulated under the RAS policy, is commenced in the event of a breach of either the RAS watch trigger or limit for any of the metrics. This ensures the Group's Board and Regulator are notified within an approved timeframe, when appropriate. In addition to RAS metrics, C&E Key Risk Indicators (KRIs) have been considered, across all material risk categories, based upon the impacts identified in the Transmission Channel Analysis and how these impacts would manifest. These KRIs are approved, reported and escalated through the appropriate governance pathways for the relevant material risk. A number of enhancements to C&E KRIs were approved in 2024, which will be reported in 2025. These include new KRIs for financial risk, operational risk and credit risk. Key Performance Indicators (KPIs) monitors the C&E risk drivers aligned to the C&E materiality assessment. The materiality assessment focus efforts on managing C&E risks with particular regard to credit and operational risk. These are reported and monitored via the Strategic Outcome Report, Climate Dashboard and ExCo Scorecards. The KPIs are cascaded to business lines and subsidiaries as appropriate. The KPIs sit on the Climate & Environmental Dashboard and roll-up into the Strategic Outcomes Report and cascade to the ExCo Scorecards. The Group actively monitors the progress of achieving the Board approved sustainability targets via the Climate Dashboard. The metrics contained in the dashboard are reported in the CRO report, to the GSC and the SBAC. The Group continues to work on integrating the processes, controls and procedures to monitor. manage and oversee material IROs within the specific Executive and Board committees and internal functions. Alignment of the In 2023, AIB established a variable remuneration scheme based on company performance. The remuneration policy scheme includes three financial measures accounting for 60% of the outcome, and three nonwith institution's financial measures accounting for 40% of the remuneration calculation. The non-financial measures environmental risk-

Section of the Annual Financial Report.

related objectives

relate to gender balance, customer satisfaction and green finance. Each component has an equal

weighting of 13.33%. The three non-financial measures align with our material topics, with green finance as the climate related consideration. Currently, performance is not assessed against GHG emission reduction targets. Further details on variable remuneration are included in Governance

## Risk management

(j) Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework Climate and Environmental (C&E) Risk encompasses the financial and non-financial impacts on the Group arising from climate change, environmental change and the transition to a sustainable economy. These risks can affect the Group directly through our operations or indirectly through our relationships with customers and third party suppliers.

#### Identification and assessment

Identification and assessment of C&E Risk is completed in line with the Groups Risk Management Framework as well as other internal processes which consist of top-down and bottom-up approaches. C&E risk comprises physical-, transition- and liability risk, while the impacts can be far reaching in breadth and magnitude over uncertain, often long-term time horizons with dependency on short term action to mitigate. The Group undertakes regular processes for the identification and assessment of C&E impacts, risks and opportunities. These include: Material Risk Assessment (MRA), Risk and Control Assessments (RCAs), Transmission Channel Analysis, Business Environment Scans, 'House Views' on key sectors, compilation of Heatmaps, C&E Stress Testing and regulatory horizon scanning. The outputs from these processes inform areas for focus in the Group's strategic, financial and investment planning processes. Further information on C&E risk assessment can be found on the Sustainability Reporting section of the Annual Financial Report

## Material Risk Assessment (MRA)

The MRA is an annual top-down process, identifying the Group's material risks in line with the Group's Risk Management Framework, taking into account the Group's strategic objectives, in addition to internal and external risk sources including climate related and environmental factors. The MRA is a key input into the Group's risk management processes, including the Risk Appetite Statement (RAS), which sets out the maximum amount of risk the Group is willing to accept in pursuit of its strategic objectives.

## Risk & Control Assessments (RCAs)

The RCA process is the detailed bottom-up risk assessment identifying the risks arising from the Group's processes and business activities. The risks are recorded on SHIELD which is the Group's governance, risk and compliance system.

## Management and measurement

C&E Risk is actively managed through the C&E Risk Framework and Policy. The C&E Risk Framework sets out the principles, roles and responsibilities, governance arrangements and processes for C&E risk management across the Group. The Framework sits within the overall group risk architecture and is one of the material risk frameworks supporting the Group's Risk Management Framework.

The C&E Risk Framework is underpinned by the C&E Risk Policy, ensuring that C&E risk is managed in line with the Group's overall purpose, the five key strategic pillars, as well as the Group's strategic objectives. The C&E Risk Framework and Policy went live in Group on 1 March 2024, and was approved and adopted by subsidiaries during the year. Both were further updated and approved through appropriate governance fora in December 2024. The changes reflect the maturing approach to C&E Risk management providing greater clarity on roles and responsibilities, due diligence, monitoring and reporting.

Due to the pervasive nature of C&E risk and its impact on other principal risks, the C&E risk management aspects for these principal risks are incorporated within their relevant risk frameworks and policies. In 2024, a number of updates were made across the principal risk policies and frameworks to enhance the management, measurement, mitigation and reporting of C&E Risks. These updates covered financial risk, model risk, regulatory compliance, operational risk (both own operations and third party providers) and credit risk. These include additional requirements for C&E Risk information and enhancements to systems to processes to enable systematic capture of this data.

(k) Definitions,
methodologies and
international standards
on which the
environmental risk
management
framework is based

Climate risk is defined as the potential negative impacts due to climate change on the Group. This includes risks posed by direct exposure to climate change, and indirect exposure through customers and suppliers. Climate Risk includes the impacts that the Group and its customers and suppliers have on the climate and the impact from the climate on the Group and its customers and suppliers.

Environmental risk is defined as the potential negative impact of the activities or actions of the Group, its customers or suppliers, directly or indirectly to the naturally occurring living and non-living components of the Earth, together constituting the biophysical environment. Changes in the state of nature (quality or quantity), may act as drivers on the Group's financial performance through risk events and could result in changes to the capacity of nature to provide social and economic functions.

The Group has identified three sub-risks related to Climate and Environmental Risk (C&E Risk) risks:

• Physical risk is defined as the potential negative financial impact to the Group of a changing climate, including more frequent extreme weather events and gradual changes in climate, as well as environmental degradation, such as air, water and land pollution, water stress, biodiversity loss and deforestation. Physical risk is categorised as acute when it arises from extreme events including droughts, floods and storms, and chronic when it arises from progressive shifts, such as increasing temperatures, a rising sea level, water stress, biodiversity loss, land use change, habitat destruction and resource scarcity. This can directly result in damage to property or reduced productivity, or indirectly lead to subsequent events, such as the disruption of the Group's supply chains.

- Transition risk is defined as the potential negative financial impact to the Group that can result, directly or indirectly, from the process of adjustment towards a lower-carbon and more environmentally sustainable economy. This could be triggered by the adoption of policies and legal requirements including regulations on products and services as well as policy support for low carbon alternatives. It encompasses the risks associated with implementing technological advancements to replace existing products with lower emission options as well as changes in market sentiment relating to customer demands and preferences
- Liability Risk is defined as the potential negative financial impact arising from physical risks, transition risk and non-compliance of regulations stemming directly or indirectly from legal claims or regulatory enforcement. This impact could be seen in a number of ways, including but not limited to misclassification of products, services or policies, non-compliance with regulations (climate and environmental related) and or financing or engaging with activities in our upstream or downstream value chain which have adverse ESG impacts.

As part of the regulation review eight regulations related to C&E risks were identified as being key or priority, noting that the below is not an exhaustive list of applicable regulation. These include the following regulations:

- European Central Bank Guide on Climate and Environmental Related Risks
- European Banking Authority ("EBA") Report on management and supervision of ESG risks for credit institutions and investment firms
- EBA Guidelines on Loan Origination and Monitoring
- EBA Final Draft for implementing technical standards on prudential disclosures on ESG risks in accordance with Article 449a CRR
- Prudential Regulation Authority Supervisory Statement on enhancing banks' and insurers' approaches to managing the financial risks from climate change ("PRA SS3/19")
- Task Force on Climate related Financial Disclosures
- Sustainable Finance Disclosures Regulation
- ECB Guide on Climate-Related Stress Testing

(I) Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels

As outlined in (j) the Group undertake an annual MRA, identifying the Group's material risks in line with the Groups Risk Management Framework. The MRA is an annual top-down process, identifying the Group's material risks in line with the Group's Risk Management Framework, taking into account the Group's strategic objectives, in addition to internal and external risk sources including climate related and environmental factors. The main outputs of the 2024 transmission channel analysis are set out in out AFR and were incorporated into the MRA. The MRA is a key input into the Group's risk management processes, including the Risk Appetite Statement (RAS), which sets out the maximum amount of risk the Group is willing to accept in pursuit of its strategic objectives.

The Risk Control Assessment ("RCA") process is the detailed bottom-up risk assessment identifying the risks arising from the Group's processes and business activities. Climate and Environmental risk is also assessed within other risk management tools including the Physical Risk, Transition Risk and Environmental Risk heatmaps. The Group uses these heatmaps to align its business practices with sustainable and environmentally standards and to identify the short (<3 years), medium (>=3-10 years), and long-term (10+ years) risks that are facing the Group.

As outlined in (d) an ESG Questionnaire has been incorporated into the credit application process, for customers in those sectors deemed to be high risk (from a transition risk perspective), who meet certain criteria on new lending over €/£1m, which have been identified as carrying increased transitional environmental, social and governance related risk. A transition risk heat-map is used to identify the high risk sectors in scope for the questionnaire. The questionnaire has both generic and sector specific questions on a range of topics from Climate & Environmental risk specific matters to social considerations such as human rights and diversity to determine an ESG risk rating. The questionnaire gets a better understanding of the ESG risk associated with the borrower and creates awareness among customers of the data that will be required from them around where they are in their ESG journey and plans going forward.

The management of climate and environmental risk is integrated into AIB's overall approach to risk management, as set out in the Risk Management section of the Annual Financial Report 2024.

In line with our Group strategy and to meet regulatory expectations on our sustainability practices, we at AIB Group continue to improve our reporting against the targets we have set across all elements of ESG as part of our strategic growth. Since 2016, we have engaged with our stakeholders to identify the issues that are material to them and have reported in line with those issues. In 2023, we carried out a 'double materiality' assessment in advance of the incoming Corporate Sustainability Reporting Directive. The final results were then brought through –and challenged by – appropriate governance, culminating in review by the Sustainable Business Advisory Board ("SBAC"). For more information, please refer to the Detailed Sustainability report. In 2024, we began a new three-year strategic cycle and our Climate Capital segment became fully operational. We reviewed the DMA, as required by European Sustainability Reporting Standard, and concluded that the foundational work from 2023 continues to provide a reliable basis for our sustainability reporting and strategic decision-making processes. Through the 2024 review, we identified 'Own workforce (Equal treatment & opportunities for all)' as an additional material topic. We also merged two environmental topics, 'Responsible lending and investment' and 'Climate change adaptation' into one topic, 'Climate change', and two social topics, 'Financial inclusion and well-being' and 'Customer banking experience' into one topic, 'Financial well-being'.

The impact of C&E risk is incorporated in the Group's stress testing framework by conducting comprehensive scenario analyses to evaluate the potential impact of various climate-related events on the Group's credit and treasury portfolios, operations and overall financial position. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but also transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. As well as participating in the ECB Climate Stress Tests in early 2022, in 2024, the Group participated in the 'Fit-for-55' climate risk scenario analysis exercise (run by the European Banking Authority (EBA) along with the other European Supervisory Authorities and the ECB), which assessed the resilience of the financial sector in line with the EU's 'Fit-for-55' plan for green transition.

The Group has identified that flooding is the most material physical risk to the Group. The Group is exposed to the risk that flooding could adversely affect the value of properties collateralising the Group's lending, which could lead to an increase in credit provisioning to compensate. An enhanced flood-risk model to support the quantification of flood-related risks was developed and rolled out during 2024. The newly developed model represents a significant step forward, in terms of both granularity and flexibility relative to previous approaches.

Transmission channel analysis is conducted annually and is used to assess how different C&E risk drivers transmit through micro and macroeconomic factors to impact the Group's material risks. The analysis considers he Group's geographical footprint, such as credit, market and third party providers, economic sectors and different asset classes, which is overlaid with the intelligence gathered through the Business Environment Scan, heatmaps and other internal research to map the Group's material risks to C&E Risk drivers. For each of the C&E Risk drivers, the micro and macro transmission channels are identified, and first and second-order impacts are assessed.

(m) and exposures contributing to mitigate environmental risks

Activities, commitments | The investment required to finance the global transition to a low carbon economy will need to increase to about \$9 trillion a year to 2030 according to estimates from the Climate Policy Initiative. The International Monetary Fund estimates the cost for Ireland will amount to c.€20 bn per annum over the next decade, much of which will come from the private sector. Recognising the importance of climate finance in funding the transition, AIB has been rapidly growing its green lending portfolio. We are driving positive change through our decarbonisation ambition to reach net zero across our own operations by 2030 and in our customer lending portfolio by 2050, while protecting our planet and contributing to society. We were the first Irish bank to set this commitment, and in 2020, our Board also approved an ambition for 70% of AIB's new customer lending to be green or transition by 2030. These targets take into account the overall Group strategy and are embedded in our financial planning process.

> Since 2019, we have provided €16.6bn of green lending, and in 2024 35% of our new lending was classified as green. Delivering for our customers whilst steering finance towards green and transition activities is an important way in which we can support the transition to a more sustainable future. Our validated SBTi targets set a trajectory linked to our green lending ambition and science-based target requirements.

In recent years the Group's ESG bond issuance has supported €6.4bn of green and social collateral, with €0.65bn of that issued in 2024. Of the €6.4bn in ESG Bonds issued to date, €4.65bn of these are green bonds These proceeds contribute to the financing of projects with clear environmental and climate action benefits, while further strengthening the Bank's capital position. Our Socially Responsible Investment (SRI) Bond portfolio funds domestic and international projects aimed at global sustainability, carbon emissions reduction and social improvement, all under the overarching themes of ESG. AIB promotes and supports the transition to a more sustainable global economy and contributes to positive environmental and social change via investment in green, social and sustainable bonds. The SRI Bond portfolio reached €2.67bn at year-end 2024. Our performance measures are integrated into our Climate and Environmental Dashboard, Strategic Outcomes report, CFO and CRO reports and GSC reporting. Progress towards achieving our targets will also help us mitigate C&E risks and reach our net zero ambition. Over time we will steadily increase our new sustainable lending activities to reach our 70% green and transition lending target by 2030.

Given the growing importance and complexity of infrastructure and energy requirements in the transition to a low-carbon economy, AIB has established the Climate Capital segment, which centralises our green energy related activities across the Group to increase our capability, support business growth and demonstrate our position as a driving force in the transition to a sustainable future. Our new Climate Capital segment is a fast growing part of the bank's lending book, and with a strong focus on renewable energy assets that displace fossil fuel-fired generating assets, will help deploy AIB's €30bn Climate Action Fund and will play a key role in underpinning the Group's Green Bond offerings. AIB continues to fund renewable energy assets and ESG infrastructure either on a bilateral or co-funding basis. These assets are located across Ireland, the UK, the EU and North America, and include technologies such as onshore and offshore wind and solar generation.

We want to encourage our customers to go green and have a suite of green products and propositions which support our customers in building a sustainable future. We offer Green Mortgages across AIB, EBS and Haven, which means our lowest mortgage interest rates are available for energy-efficient homes. All three entities provide Green Mortgages to homes with a Building Energy Rating (BER) of between A1 and B3, to new and existing mortgage customers including customers seeking to switch their mortgage. AIB is a preferred finance provider to Electric Ireland Superhomes, a One Stop Shop which looks after all the key stages of a home energy retrofit and through them they offer the AIB Green Personal Loan. Customers who are building their own home can chose from the full range of mortgage products, including one of the lowest Green rate mortgages in the market (where compliance with nearly Zero Energy Building (nZEB) standards is demonstrated). In 2024, the government, in partnership with the Strategic Banking Corporation of Ireland (SBCI) launched the new low cost Home Energy Upgrade Loan Scheme for homeowners. AIB is one of the finance providers approved to participate in this scheme. Customers can borrow between €5,000 and €75,000 per property, for up to three properties, up to a maximum of €225,000 in total. Furthermore, up to 25% of the loan can be used for non-energy upgrades. Loans will be available up to 31 December 2026 or until the scheme is fully subscribed.

We are committed to supporting businesses of all sizes. Through our partnership with the SBCI, we offer the Growth and Sustainability Loan Scheme. This is a long-term, low-cost loan scheme to support our customers in business and agriculture. There are two loans offered under the SBCI Growth and Sustainability Loan Scheme. The 'Climate Action & Environmental Loan' is available to businesses who qualify as a green enterprise or are investing in green measures. The 'Growth and Resilience Loan' is for long-term investments in the business' growth and resilience. The SBCI operates the scheme, which benefits from a guarantee from the European Investment Bank Group and support from the Department of Enterprise, Trade and Employment and the Department of Agriculture, Food and the Marine. We continue to be focused on the longterm sustainability of our business customers. In 2024 we launched our new Transition Finance Guidance to assist with the classification of financing as transition and is complementary to our SLF in supporting our corporate customers.

Educating customers is central to supporting their transitions, as well as deploying our Climate Action Fund, achieving our green and transition lending targets, our financed emissions reduction targets and reducing C&E risk. We also have dedicated educational resources, available on our website, to support our customers in building a more sustainable future, such as: Sector Sustainability Guides and the AIB Green Living Hub. Additionally, our commitment to educating our customers is reflect in our 'SME Steps to Sustainability' resource for SME businesses to guide them to take sustainable action. We developed this in 2024 following conversations with SME customers and in partnership with many colleagues supporting SMEs across AIB. We also publish reports on our website of research carried out, such as the AIB Homes Retrofit Report, which highlights retrofit options, generous grants and competitively priced loans available to consumers wishing to improve their homes' energy efficiency. This year at our Sustainability Conference, we announced the €20m investment in sustainability education and research, with €10m allocated to a new AIB Trinity Climate Hub in Trinity College Dublin and a €10m commitment as founding partner of Innovate for Ireland.

AIB will continue to support transition efforts that are aligned with our strategy and decarbonisation ambitions and engage with organisations to ensure we can support positive change. To help drive this agenda, we have joined a multitude of voluntary organisations, including the Carbon Disclosure Project (CDP), Science Based Targets Initiative (SBTi), Net Zero Banking Alliance (NZBA), UN Global Compact, and the World Banking Council for Sustainable Development (WBCSD). AIB is a founding signatory of the UNEP FI Principles for Responsible Banking (PRB). The Principles are a framework for ensuring that signatory banks' strategy and practice align with the vision society has set out for its future in the Sustainable Development Goals and the Paris Climate Agreement. They aim to promote a sustainable banking system and helping the banking industry to demonstrate how it makes a positive contribution to society. PRB requires banks to align their strategy to support challenges for the societies in which they operate, with a focus on the areas where they can have the most significant impact. AIB also supports the United Nations Sustainable Development Goals (SDGs) and considers these as part of wider sustainability strategy.

We also participate in and provide thought leadership and knowledge sharing sessions. The eighth AIB Sustainability Conference opened Climate Finance Week in November 2024. With 11,481 hybrid attendees, it was the largest event to date, hosting impactful conversations with global figures. AIB's customer panel discussions also provided an opportunity for our customers and other attendees to understand how they can act, regardless of size or industry, and be part of the solution. We also collaborate with our customers by advising them on their transition pathway through dedicated sustainability champions, an in-house Sustainability Research function, customer events and webinars and an enhanced sustainability advisory services offering via Goodbody Clearstream.

For more information on activities, commitments and exposures contributing to mitigate environmental risks, please see responses 1(b) and 1(c) above.

for identification, measurement and management of environmental risks

Implementation of tools | The impact of C&E risk is incorporated in the Group's stress testing framework by conducting a comprehensive scenario analysis to evaluate the potential impact of various climate-related events on the Group's credit and treasury portfolios, operations and overall financial position. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. As well as participating in the ECB Climate Stress Tests in early 2022, in 2024, the Group participated in the "Fit-for-55" climate risk scenario analysis exercise (run by the European Banking Authority ("EBA"), the ECB and other European Supervisory Authorities), which assessed the resilience of the financial sector in line with the "Fit-for-55" EU plan for green transition.

> The Business Model, the Capital Adequacy Framework and the Stress Testing Policy integrate C&E risks into the Group's stress testing operations. The Group's Stress Testing Policy sets out the key processes, governance arrangements and roles and responsibilities around stress testing in general, including C&E risk impacts.

> The climate stress testing approach and associated models consider the impact of physical and transition risks across a range of scenarios on the Group's Credit exposures. The initial scope of climate stress testing activities and climate modelling in the Group is primarily focused on the credit risk implications for the loan portfolio via both transition and physical risk. This is where the most material impact of climate stresses impacts the Group with the approach covering all customer loans and advances on the balance sheet. As such, aside from the indirect macro impact stemming from the climate scenarios (e.g. interest rate trajectories) direct transmission channels (via other material risks) or direct upstream impacts (e.g. via our suppliers) are excluded from these stress scenarios.

> The Group has identified that flooding is the most material physical risk to the Group. The Group is exposed to the risk that flooding will adversely affect the value of properties collateralising the Group's lending, requiring an increase in credit provisioning to compensate. Following the development of an enhanced flood-risk model to support the quantification of flood-related risks, this was rolled out during 2024 and associated impacts derived. The newly developed model represents a significant step forward in terms of both granularity and flexibility relative to previous

> As a first step, the new model locates individual properties and overlays a series of flood maps corresponding to river, coastal and surface water flood events. This is repeated for multiple return periods (1-in-20-year, 1-in-1000 year) allowing for a probability distribution of flood levels to be calibrated for each property. The damage to each property for a given level of flooding is estimated based on building type and flood type. Estimates of rebuild costs are applied to calculate the cost of repair. Using this approach, the model can be used to quantify flood-damage impacts across a probability distribution of flood severities and, from this, estimate "Expected Annual Damage" as the probability-weighted-average of flood-damage costs. This approach can be applied to reflect current climate conditions or projected climate conditions under a variety of science-based scenarios developed by the IPCC (Intergovernmental Panel on Climate Change). The scenarios currently available are Representative Concentration Pathway ("RCP") 2.6, 4.5, 6.0 and 8.5 at 5year intervals out to 2100. RCP8.5 assumes by far the greatest CO2 concentration and temperature anomalies, whereas RCP2.6 has a far lower amount. RCPs work intuitively – the greater the RCP value, the stronger the physical risk signal will be for the scenario. Some RCPs map closely to the Network for Greening of the Financial System (NGFS) scenarios being used by regulators for climate stress testing.

In this way, the model is used to quantify flood risk under a range of climate scenarios including high-emissions scenarios for horizons out to 2055. Consequently, the model supports the Group's Internal Capital Adequacy Assessment Process ("ICAAP") and stress testing more generally which, in turn, informs assessments of the materiality of flood risk in the short, medium and long term such that, if required, mitigating actions can be taken in a timely manner. The ICAAP is the Group process to ensure adequate capital resources are maintained at all times, having regard to the nature and scale of its business and the risks arising from its operations. It is the process by which the Group performs a formal and rigorous assessment of its balance sheet, business plans, risk profile and risk management processes to determine whether it holds adequate capital resources to meet both internal objectives and external regulatory requirements.

A known constraint of the new model is that, while it can estimate the probabilities of a given level of flooding for individual properties, it cannot estimate the joint probability of a given level of flooding for multiple properties. This limitation is overcome by stressing the flood risk of individual properties in a way that is consistent with a plausible stress-scenario narrative characterized in geographic terms.

The new flood-risk model's "layered" approach to quantifying flood damage impacts facilitates analysis of key risk drivers and their relevance to the Group's exposure. For example, acute scenario impacts can be decomposed by flood-type, building-type, customer-type and geographic location.

The Group is exposed to risk through the potential negative impact on the creditworthiness of its customers associated with the uncertainties and challenges associated with a transition to a more sustainable low-carbon economy. The Group quantifies this potential impact using transition risk models centred on carbon emissions charges. Following the development of two new transition risk models, one for Retail (Mortgages) and one for Non-Retail, these models were implemented and rolled out in 2024.

Climate scenarios for Transition risks are focused on a forecast of macroeconomic drivers of risk, used in stress testing models, to assess a climate-focused 3 year forecast under the ICAAP structure. Two scenarios are used to assess transition risk in the short to medium term.

- The first, Paris Aligned, assumes that governments pursue incentives to reduce carbon emissions. They do this in a carefully structured way, with incentives geared towards a structured reduction systematically implemented.
- In the Sudden Realisation scenario, it's assumed that a limited number of actions have taken place, with the "shock" coming from unstructured & significant implementation of carbon-reduction levies and taxes. The resultant volatility is caused by the sudden implementation of climate-positive policies to "make up" for time when they weren't in place.

In these scenarios, forecasts of factors which drive increased risk in Group credit portfolios have been made. These factors are implemented in the ICAAP credit stress testing engine and applied to the group balance sheet, with business plans integrated into growth forecasts in credit exposures and existing IFRS9 risk parameters.

Both "stressed" Climate Risk economic forecast scenarios focus on the impacts of additional (hypothetical) carbon emissions charges caused by changes to market conditions and through government policy & incentives.

• For the Retail model, this tax would affect disposable incomes for Retail customers which may present challenges for customers and the Group, depending on how unexpected they are and how punitive the taxes. The stress test output is an analysis of the potential impacts of this scenario to the mortgage book, where charges are applied based on the carbon emissions of homes which leverages data on property Building Energy Ratings. For Non-Retail customers, the model reflects the borrower's affordability by reducing profits & increasing costs. Charges are applied in this model based on the scope of carbon emissions of the NACE sector in which the borrower operates. The stress test output provides an analysis of the potential impacts of this scenario to the Non-Retail borrowers.

The stress tests described above were included in the ICAAP process (which was approved in 2024) which provided assurance that bank had adequate capital to withstand these risks. For more information on how AIB integrates of short-, medium- and long-term effects of environmental factors and risks in the risk framework, please see response 1(j) above.

(o) Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile

The Group participated in the European Central Bank Climate Stress Tests in early 2022 where it was evident that the scale of the economic shocks applied were modest compared to Severe scenarios applied for Internal Capital Adequacy Assessment Process and Expected Credit Loss ("ECL") calculations, for those portfolios included in the test. In 2024, the Group also participated in the European Banking Authority ("EBA") "Fit-for-55" climate risk scenario analysis exercise, which aims to assess the resilience of the financial sector in line with the "Fit-for-55" EU plan for green transition.

The Business Model, the Capital Adequacy Framework and the Stress Testing Policy integrate C&E risks into the Group's stress

testing operations. The Group's Stress Testing Policy sets out the key processes, governance arrangements and roles and responsibilities around stress testing in general, including C&E risk impacts.

The impact of climate risk was considered as part of the ECL governance process at 30th June 2024 and it was deemed that insufficient evidence of the likely loss impacts from climate events is available to adjust ECLs materially but that the Group's approach to individual counterparty risk assessment adequately captures climate risk where appropriate. The impact of climate risk continued to be monitored in 2024 to ensure ECLs appropriately reflect latent risk from potentially emerging climate risks.

(p) Data availability, quality and accuracy, and efforts to improve these aspects

The management of C&E data is essential to support progress and drive impact for both the achievement of AlB's strategic imperatives and our regulatory obligations. We report certain value chain and quantitative metrics by relying on data derived indirectly through third-party data providers or sector average value. This information may be estimated using estimation factors which may significantly affect the reported information. The Group cannot influence estimates and assumptions made by a third-party data provider. As real data becomes available and calculation methods develop, the quality of data will improve gradually. This means that figures may change over the coming years, and there may also be changes in figures from previous ESG reports. New guidance, industry standards and scientific research are anticipated, and we reserve the right to periodically review and update targets, methodologies and approaches and to restate baselines as necessary.

### Physical Risk Data

In relation to physical risk, heat maps have been developed and implemented to determine the risks and impact with flood risk being identified as the most significant physical risk for the Group. Flood risk assessment tools have been developed to measure the Group's exposure to flood risk. In addition, AIB conducts flood sensitivity analysis to measure potential impact from future flood scenarios by reviewing JBA flood hazard location data. Outputs of these works are reported in template 5 of our Pillar 3 ESG risk disclosures and have been included in our Climate & Environmental Dashboard to enable the ongoing monitoring of AIBs exposure to NFCs sensitive to flood risk secured on immovable property.

#### Transition Risk Data

In Republic of Ireland, AIB has a significant reliance and dependency on the Sustainable Energy Authority of Ireland (SEAI) providing Financial Institutions with access to their database on Building Energy Rating. Currently, AIB is prevented from accessing this database and whilst engagement is ongoing through the BPFI any change to that exclusion is not expected until at least 2027.

## A. Energy Efficiency Data

The importance of reducing reliance on proxies and collecting more real data on energy efficiency for the Residential Real Estate (Mortgages) back book is fully understood and endorsed by AIB. However it is not without challenge given there is a complete reliance on our mortgage customers to provide this data and limited incentivisation for them to do so. Mortgage customers, particularly those with older homes or those who have been in their home for a number of years, are unlikely to have a valid BER/EPC Certificate and providing same to AIB will result in additional cost which cannot be forced on customers.

## Residential Real Estate

- Mandatory provision across all AIB Group Brands of BER/EPC Certificate for all new mortgage customers including First Time Buyers, Movers, Switchers, Top-ups, PDH & BTL from 24 January 2025;
- Reliance on the European Union (Energy Performance of Buildings) Regulations which came into force on 1 November 2019 which states that new homes will be required to achieve a minimum BER of A2. Where date of construction is held and is post 01 November 2019, the home will be determined to be a BER of A2;
- Continued engagement with BPFI/SEAI to progress access to the SEAI BER Cert database (ROI Only);
- Review of RRE back book to determine customer cohorts and identification and analysis of treatment strategies:
- Identification of 'always on' opportunities for customer engagement; and
- Consideration of any internal and external factors, lessons learnt from the front book exercise and customer sentiment.

## Commercial Real Estate

- Mandatory provision of BER/EPC for all new term and committed RCF lending (including refinancing) from 31 January 2025;
- Analysis of CRE back book to determine scale and identify any immediate opportunities;
- Interrogation of the SEAI Non-Residential BER Cert database to identify, collect and store asset level energy efficiency data;
- Interrogation of the gov.uk/find-energy-certificate and Scottish Energy Performance Certificate Register to identify, collect and store asset level energy efficiency data;
- Consideration to capturing alternative building energy efficiency sources where a BER/EPC certificate is not a legal requirement e.g. Energy audits, BREEAM assessment, LEED credentials;
- Investigation and development of solution for multiple BER/EPC ratings against one CRE exposure; and
- Investigation and development of solution for 'portfolio' exposures.

The importance of the collection, storage and accessibility to energy efficiency data for new Commercial Real Estate (CRE) business in the context of C&E Risk is fully understood and endorsed by AIB. However it is not without challenge given the national weaknesses in energy efficiency data availability and integrity across all sectors and geographies; the absence of legal obligations for some customers to provide the data; the relative immaturity of the supporting infrastructure (assessor availability v demand) and the downstream customer impacts including cost and delays in making finance available. These factors have been considered in developing an approach that supports AIB's management of C&E risk in our credit risk management processes.

AIB is fully committed to collecting and storing energy efficiency data for in scope CRE new lending (incl. refinancing). There are nuances that require further investigation including individual CRE exposures with multiple BER/EPC ratings e.g. an exposure to a hotel with several BER/EPC ratings; an exposure to shopping centre with multiple outlets with different BER/EPC ratings. Further investigation is required to solve for 'portfolio' exposures such as social housing, student accommodation, apartment blocks which can have several hundred assets with a range of energy efficiency data. These investigations have been built into the strategy to collect more real data on energy efficiency for the CRE back book.

Overall progress on energy efficiency data will be measured, monitored and reported through relevant executive governance fora including Group Sustainability Committee. In addition to energy efficiency data, focus will also be placed on the collection of Eircode/Postcode data e.g. through the use of an Eircode/Postcode database provider e.g. ECAD the National Database for Eircodes.

#### R GHG Data

At a global level, poor GHG data availability and quality is forcing market participants to rely on industry benchmarks, governmental authority data and large international data. We have reviewed the availability of the availability of GHG emissions data for a sample of our counterparties based publicly available company reports. At this stage, no emissions data is readily available in the majority of cases. At this stage, we have a three-pronged approach to GHG emission data collection and storage strategy:

- 1. We collect where we can at this time, a manual data collection process has been created to collect reported Electricity Generation data at origination and on an ongoing basis.
- 2. We source available data from third party provider AIB already has an existing automated process in place (since May 2023) to procure emissions data from a third-party provider (ICE Data Services). Collected data is based on published data at counterparty level with estimated emissions data based on NACE Sector activities relevant to the counterparty. All data collected is stored in AIB's Enterprise Data Warehouse (EDW). In addition, AIB has sourced its Agri emissions data from Teagasc (the national Agriculture and Food Development Authority), which are more reflective of borrowers in the dairy and beef sub-sectors.
- Overtime implement a strategic solution to the collection and storage of GHG emissions
  data relevant ESG emissions data elements. In line with the evolution of the data emissions market
  and reporting environment, AIB will further enhance the existing data collection and storage
  processes.

Availability of reported emissions data for counterparties is expected to increase over time as more counterparties come into scope for reporting their emissions due to various sustainability disclosure/reporting requirements e.g. CSRD. In addition, data collection will improve over time as XBRL expands to include CSRD reporting.

Although there has been a strong focus on embedding ESG data into BAU activities, there exists data availability and/or limitation challenges which will require further remediation to ensure a systematic approach to reduce reliance on proxy information and collect the relevant data required.

Approach taken to proxy estimation of GHG emissions data

GHG finance emissions reporting requires proxy methodology in the absence of actual counterparty emissions data. Proxy methodologies include a top-down approach using emissions data provided by an external supplier, ICE:

- GHG Emissions are calculated by taking Counterparty Emissions (NACE Intensity Value x Counterparty Revenue) x Attribution Factor (Drawn Balance / Total Assets).
- Three-year mean Teagasc emissions data assumed for both Agri Dairy and Beef (source: Teagasc Sustainability Report 2023).
- ICE (December 2022) for all other cases except Electricity Generation (Power) based on actuals where the data is sourced from the counterparty.

## **Next Steps**

In line with our three-pronged approach outlined above we will undertake the following:

- Continue to collect reported Electricity Generation data at origination and on an ongoing basis as a tactical solution until a strategic IT solution is implemented.
- Continue to monitor the availability of emissions data for our counterparties along with working collaboratively with our third-party provider to further enhance our data collection and storage process.
- Over time implement a strategic solution to collect and store GHG emissions data including consideration of feasibility of ESG emissions data collection in Transition Finance and ESGQ due diligence processes.
- Continued focus on data quality to enhance the accuracy and use of GHG emissions data.

(q) Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits

As noted in (I) and (m), AIB has an excluded activities list in place since 2020, which sets out a range of business activities that do not align with our Group strategy. From a sustainability perspective, excluded activities include the exploration, extraction and upgrading of oil sands projects, nuclear power generation, nuclear waste transportation, and the decommissioning and/or final disposal of high level nuclear waste. Our rules apply to all business customers with a Gross Connected Exposure of >£/€300k and who are relationship managed, prohibiting us from providing them with new money when their activities are covered by this list. The list of excluded activities is publicly available at www.aib.ie/sustainability.

As outlined in section 1(j), C&E Risk is actively managed through the C&E Risk Framework and Policy. The C&E Risk Framework sets out the principles, roles and responsibilities, governance arrangements and processes for C&E risk management across the Group. The Framework sits within the overall group risk architecture and is one of the material risk frameworks supporting the Group's Risk Management Framework.

### Monitoring, escalating and reporting

C&E risk is monitored through internal and external reporting across the Group. The primary internal risk report, the CRO report, dedicates a section to C&E risk providing the GRC and the BRC with relevant updates on the C&E risk profile. The profile section encompasses the key developments around the risk, planned initiatives and also reports on the Group's performance against risk appetite and against other Key Risk Indicators.

Monitoring and reporting of the C&E quantitative RAS metrics is conducted monthly. The escalation process, as stipulated under the RAS policy, is commenced in the event of a breach of either the RAS watch trigger or limit for any of the metrics. This ensures the Group's Board and Regulator are notified within an approved timeframe, when appropriate.

In addition to RAS metrics, C&E Key Risk Indicators (KRIs) have been considered, across all material risk categories, based upon the impacts identified in the Transmission Channel Analysis and how these impacts would manifest. These KRIs are approved, reported and escalated through the appropriate governance pathways for the relevant material risk. A number of enhancements to C&E KRIs were approved in 2024, which will be reported in 2025. These include new KRIs for financial risk, operational risk and credit risk.

Key Performance Indicators (KPIs) monitors the C&E risk drivers aligned to the C&E materiality assessment. The materiality assessment focus efforts on managing C&E risks with particular regard to credit and operational risk. These are reported and monitored via the Strategic Outcome Report, Climate Dashboard and ExCo Scorecards. The KPIs are cascaded to business lines and subsidiaries as appropriate. The KPIs sit on the Climate & Environmental Dashboard and roll-up into the Strategic Outcomes Report and cascade to the ExCo Scorecards. The Group actively monitors the progress of achieving the Board approved sustainability targets via the Climate Dashboard. The metrics contained in the dashboard are reported in the CRO report, to the GSC and the SBAC. The Group continues to work on integrating the processes, controls and procedures to monitor, manage and oversee material IROs within the specific Executive and Board committees and internal functions.

(r) Description of the link (transmission channels) between environmenta risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework

Climate and Environmental ("C&E") Risk is actively managed through the C&E Risk Framework and Policy. The C&E Risk Framework sets out the principles, roles and responsibilities, governance arrangements and processes for C&E risk management across the Group. The Framework sits within the overall group risk architecture and is one of the material risk frameworks supporting the Group's Risk Management Framework. The C&E Risk Framework is underpinned by the C&E Risk Policy, ensuring that C&E risk is managed in line with the Group's overall purpose, the five key strategic pillars, as well as the Group's strategic objectives. The C&E Risk Framework and Policy went live in Group on 1 March 2024, and was approved and adopted by subsidiaries during the year. Both were further updated during 2024 and approved through appropriate governance in December 2024. The changes, effective immediately, reflect the maturing approach to C&E Risk management providing greater clarity on roles and responsibilities, due diligence, monitoring and reporting.

Due to the pervasive nature of C&E risk and its impact on other principal risks, the C&E risk management aspects for these principal risks are incorporated within their relevant risk frameworks and policies. In 2024, a number of updates were made across the principal risk policies and frameworks to enhance the management, measurement, mitigation and reporting of C&E Risks. These updates covered financial risk, model risk, market risk, regulatory compliance, operational risk (both own operations and third party providers) and credit risk. These include additional requirements for C&E Risk information and enhancements to systems to processes to enable systematic capture of this data.

Transmission channel analysis is conducted annually and is used to analyse how different C&E risk drivers transmit through micro and macroeconomic factors and impact the Group's material risks. The analysis considers the Group's geographical footprint from the perspective of credit, market and third party providers, economic sectors and different asset classes which is overlaid with the intelligence gathered through the Business Environment Scan, heatmaps, and other internal research to map the Group's material risk to C&E risk drivers. For each of the C&E risk drivers, micro and macro transmission channels are identified, and first and second order impacts are assessed. The Group's Materiality Matrix (GMM) is used to determine the materiality of the impact on individual risk types, which considers reputational and regulatory impacts, as well as financial losses and impact on business objectives. The 2024 assessment considered 16 drivers including transition, physical and environmental risk, and was completed over the short (<1 years), medium (1-10 years) and long term (10+ years) to recognise changing impacts of C&E risk drivers over different time horizons and their impact on each of the principal risks listed in the Risk Management section of the AFR.

As referenced above, the impact of climate risk under various climate scenarios is assessed as part of the stress testing process within the Group. It is noted however that the impacts are not expected to manifest in the short-term and therefore no requirement to make any related adjustments to the financial statements.

For more detail on mapping of physical and transition risk across other AIB principal risks (conduct and culture risk, model risk, business model risk and regulatory compliance risk) please refer to the Risk Management section of the Annual Financial Report.

# 80: Table 2 - Qualitative information on Social risk

As per Article 449a CRR, the following table describes the integration of social risks in AIB Group's business strategy and processes, governance and risk management.

Row number		Qualitative information
Hamber		Business strategy and processes
(a)	Adjustment of the institution's business strategy to integrate social factors and risks taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning	AlB continues to support the transition to a low carbon future, building long-term resilience and sustainability for our business, economy and society through our purpose of empowering people to build a sustainable future. Our sustainability strategy is integrated with our overall Group strategy, with Sustainable Communities as a core strategic pillar. It aligns with the Group's three strategic areas of focus, which place an enhanced focus on serving our customer across the Group, greening our business and driving greater operational efficiency. Along with aligning to the Group's strategic ambition, AlB's sustainability strategy is in line with best practice and aligned to requirements of the new Corporate Sustainability Reporting Directive ("CSRD") as well as material topics identified through a DMA process. The financial impact associated with our sustainability strategy is considered as part of business and financial planning, ensuring that our strategy and business model are compatible with the transition to a sustainable economy and in line with the Paris Agreement aim to limit global warming to 1.5°C. We require each AlB business area to consider how meeting these targets will impact its projected revenues, costs and margins.
		Our Societal and Workforce Progress pillar as part of our sustainability strategy is a foundational pillar aiming to make a positive economic contribution and to be a positive influence on society, improving the lives of people and their communities and helping to build a brighter and fairer future. Our areas of focus include:  Put our customers first, always treating them fairly and with respect.  Continue to proactively contribute to a robust and sustainable economy and society.  Empower our workforce and foster a safe, inclusive and supportive work environment.  Support our communities and local initiatives in a sustainable way.
		Customer First continues to be at the centre of our Strategy. We invest in developing tailored financial products that meet our customers' needs and support their financial well-being. We strive to deliver simplicity, agility, speed and self-service while safeguarding the accessibility and equality of opportunities to access financial services for all. We offer advisory services via Goodbody Clearstream and specialist advice for our clients on their sustainability journey, from advisors across AIB Group. We also provide financial literacy programmes and have additional supports in place to take extra care of our vulnerable customers.
		We recognise our role in supporting with social challenges such as access to housing. We fund new developments and support social and affordable housing programmes, seeking to improve the availability and affordability of housing for our customers and the wider community. Our people know and serve our customers. To promote equal treatment and opportunities for our own workforce, we have dedicated policies and actions in place to support diversity and inclusion as well as training and skill development. We have dedicated sustainability resources, including an in-house ESG research function, AIB Sustainability Champions and AIB Sustainability Academy which is a hub for all ESG learning, sustainability resources and education opportunities. We continuously engage with product owners and frontline staff when developing new green and transition products. Overall, stakeholder engagement is key to advance our strategic ambitions. Our Sustainability Conference brings together exceptional international and Irish trailblazers, each providing their unique perspective to help demystify the global transition to a more sustainable future. We continued with our contribution to the wider community and society, through the annual AIB Community €1 Million Fund, part of the €11.3m Community Investment.
		In 2023, we carried out a DMA ("DMA") process to identify and assess our material sustainability matters from an impact and financial materiality perspective. From an impact materiality perspective, we define impacts as the positive or negative effects we have or could have on people and the environment, connected with our own operations and our upstream and downstream value chains across short, medium-, or long-term. Impacts are linked to our products and services, as well as to our direct and indirect business relationships, for example through our clients' value chains. From a financial materiality perspective, we define risks and opportunities as the financial effects that affect, or could reasonably be expected to affect, our financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium and long term. Collectively the impacts, risks and opportunities are referred to as IROs.
		In 2024, we began a new three-year strategic cycle and our Climate Capital segment became fully operational. We reviewed the DMA, as required by the ESRS, and concluded that the foundational work from 2023 continues to provide a reliable basis for our sustainability reporting and strategic decision-making processes.

Through the 2024 DMA annual review exercise, we identified 'Own workforce (Equal treatment & opportunities for all)' as an additional material topic. We also merged two environmental topics, 'Responsible lending and investment' and 'Climate change adaptation' into one topic, 'Climate change', and two social topics, 'Financial inclusion and wellbeing' and 'Customer banking experience' into one topic, 'Financial wellbeing'.

Our three material social topics were identified – Financial Wellbeing, Housing, and Equal Treatment and Opportunities for All (in own workforce) – refer to response 2(b) for further details on these. Details of the associated IRO's are available within our Sustainability Reporting section of our 2024 AFR.

AIB carries out an annual Material Risk Assessment ("MRA") where Principal Risks such as Climate & Environmental are identified, assessed, managed, monitored and reported upon. The MRA is a top down process performed on at least an annual basis for the Group which identifies the key principal risks such as the Climate & Environmental Risks and the identification of emerging and evolving risks. This assessment makes use of horizon scanning and takes into account the Group's strategic objectives and incorporates both internal and external risk information. The Board is responsible for the annual approval of the Group material risk assessment. Additionally, the transmission channel analysis is conducted annually to analyse how different C&E risk drivers transmit through micro and macroeconomic factors and impact on the Group's principal risks. In addition to the MRA, the Group has other risk management processes such as the Internal Capital Adequacy Assessment Process ("ICAAP") and the Internal Liquidity Adequacy Assessment Processes ("ILAAP"), both of which consider climate related factors in assessing capital adequacy and liquidity. The outcomes of risk management processes such as the MRA are an important input factor to the DMA process, informing alignment and calibration of results. The Group is continuously working on integrating the DMA process, including the identification of risks and opportunities, in the overall planning, risk management and internal controls as applicable.

Objectives, targets and (b) limits to assess and address social risk in short-term, mediumterm and long-term, and performance assessment against these objectives, targe and limits, including forward-looking information in the design of business strategy and processes

Our first Societal and Workforce material topic is financial wellbeing. Customer First remains at the centre of our strategy. In July 2024, AIB has appointed a Chief Customer Officer who will support the Group's ambition to be at the heart of customers' financial lives by comprehensively and sustainably meeting their personal and business life stage needs and by further driving a customer centric culture across the enterprise. We want our customers to understand, have access to, and effectively manage their own money, so they can achieve the life they are after. We also take extra care of the most vulnerable in society. Along our value chain we support consumers, SMEs and large corporates, through our products, services, and through our direct and indirect business relationships. While the banking landscape in Ireland is ever-changing, we continue to rise to the challenge and we strive to do better for them. Ensuring the financial wellbeing of our customers is key to achieving this. This includes activities such as ensuring equal opportunities to access financial services, as well as providing financial education to our customers, including vulnerable groups, so they can make informed decisions. It also includes enhancing the customer experience, through simplicity, agility, safety and self-service, and effective management of customer relations.

Financial well-being In line with our strategy, we put customers first and their financial wellbeing is at the heart of what we do. We aim to continually adapt our service and product offering to meet the needs of our customers, throughout their life-stages, while always being fair, transparent, and accessible, and consistently delivering the best value we can offer. Every day, the Group supports our customers to make financial decisions and we aim to improve our customer experience and the financial products and services we

### **Tailored Financial Products**

We support our customers through different financial and life stages from the beginning of their education to planning for and entering into retirement. We offer tailored financial products along those life stages, which include our student lending products, and AIB Advantage accounts for our older customers. In supporting our customers through their life stages, we aim to continually improve their banking experience with us. We track the effectiveness of this within our Customer Experience surveys.

We have AIB life which offers a full suite of Protection, Investment and Pension products to support the financial wellbeing of our customers. We aim to inform our customers on how to build financially secure futures for themselves, their families and their businesses via our dedicated Financial Advisors, who provide advice and guidance on how to make our customers' futures more secure. A financial consultation provides a comprehensive review of each customer's financial circumstances and goals which identifies appropriate protection, investment and retirement planning solutions to deliver a sustainable financial future for that customer.

We promote access to education through our student loan offering, which allows full-time third level students to access loans at a discounted student rate when they open a Student Plus account. For students who need assistance covering their Student Contribution Charges and other fees, we also offer specific tailored loans. In 2024 we provided 9% more Student Plus loans than the previous year.

Our older customers (aged 66 and over) are eligible for our AIB Advantage account which provides banking free with no maintenance or transaction fees.

The Product and Propositions Risk Policy sets out our approach for managing and mitigating risks in relation to the development of products, propositions, services and customer solutions, and we do this in line with our Group Risk strategy and Risk Appetite (note Goodbody have a separate Product Governance Model in place).

### Customers in vulnerable circumstances

We recognise that every customer is different, and some require additional care, support or protection to meet their day-to-day banking needs. Vulnerability can affect any of us, at any time, when periods of stress or difficulty compromise our ability to cope, manage our finances and make decisions. We consider someone to be a vulnerable customer, when, due to their personal circumstances, they require additional care or support to prevent poor or unfair customer outcomes. This can include customers with an accessibility need, a language barrier, customers facing a time of stress and difficulty, or our younger

## **Customer Vulnerability Guidelines**

Our Customer Vulnerability Guidelines support us in managing conduct risk relating to customers in vulnerable circumstances. The guidelines are a key supporting document to the Group Conduct Risk Policy, for both personal and business customers. The guidelines recognise that when our customers are experiencing vulnerable circumstances, they may be significantly less able to represent their own interests and more likely to suffer harm, and therefore require additional support.

The guidelines are owned by the Head of Customer Vulnerability, and sponsored by the Consumer Strategy, Proposition and Enablement Director.

Under our Conduct Risk Policy, each ExCo member is responsible for the effective implementation of Customer Vulnerability processes in their business and for monitoring their effectiveness.

We are committed to ensuring that all our customers are enabled to make better-informed financial decisions. AIB has a positive impact by promoting financial literacy through education initiatives and ensuring that our communication is clear and straightforward. We believe that all forms of customer communications, including our advertising, should be clear, fair, accurate, and not misleading. Our actions to use clear, fair and accurate communication in promoting financial literacy, are aligned with and supported by our Group Conduct Risk Policy.

#### Our performance measures

AlB life is our unique proposition which offers the general market a full suite of protection, investment and pension products. Last year, there were 31,808 Financial Planning consultations carried out by our qualified advisors. All financial planning consultations are recorded on a dashboard. A four eye review for all figures is performed and recorded. No judgements or estimations are applied. With the appointment of our Chief Customer Officer in 2024, we will continue to track our progress in customer service along with the volume of finance provided through our tailored financial products. We will also consider further developing how we measure our impact with other aspects of financial wellbeing for our customers, including those who are most vulnerable and require additional support. Our focus is now on identifying additional initiatives and actions to better equip our customers to make informed decisions, manage their finances and use banking products and services responsibly.

As an Irish mortgage provider, we are attuned to the unique complexities facing the Irish housing sector and the needs of our customers. Access to housing is a critical issue for our communities, wider society and future generations. We help to improve the availability and affordability of housing through several key initiatives and actions. These include supporting social and affordable housing programmes, and funding new developments. We also support our retail customers to have access to more environmentally friendly and economically efficient housing through different green products, such as our green mortgage offerings, which are detailed in the Environmental chapter of the Sustainability Reporting section of the AFR.

Housing is a strategic priority for AIB, representing 51% of our loan portfolio. We lend to first time buyers and finance social and affordable housing that benefits the wider community. This in turn supports people's ability to achieve financial stability and security, influencing their quality of life and well-being. We contribute to meeting the national need for housing by financing housing developments, and offering finance to purchase homes, in societies in which we operate. Through our Customer First and Sustainable Communities strategic pillars in particular, our housing strategy contributes to a robust and sustainable economy and society. Also some of the funding we provide to Approved Housing Bodies (AHBs), authorised scheme providers under the mortgage-to-Rent scheme, and to borrowers under the First Home Scheme (FHS) and Local Authority Affordable Purchase Scheme (LAAPS) are included in our social

Our main policies governing our provision of finance for residential mortgages and residential developments, including Build-to-Rent (BTR), Private Rented Sector (PRS) and social housing developments, are outlined below. The policies cover all our customers in Ireland and the UK (as applicable). In line with Risk Policy governance requirements, we review each policy periodically, so that we can continue to meet our customers' housing needs and support Government-led initiatives. These reviews also incorporate key stakeholders' interests and feedback from across the organisation.

- Group Residential Mortgage and Development Policies
- Commercial Investment Policy
- **Social Housing Policy**
- Social Bond Framework

For more information on these Policies please see the Societal and Workforce section of the AFR.

### Our performance measures

We currently track the performance measures set out below and AIB continue to track and monitor finance provided for social and affordable housing in Ireland and social Housing in the UK. We will also consider developing other metrics over time, to measure our performance within the housing value chain in Ireland

# First-time buyers

We have made a commitment to deliver more than €6bn of cumulative new lending to first-time buyers in the Republic of Ireland ("ROI") by 2026. Our Housing performance measure was guided by our internal target setting process which involved results from an internal scenario analysis being considered by internal senior management teams and relevant governance fora to ensure alignment with our broader Group and Sustainability Strategy. In 2024, we made substantial progress by providing €2.79bn in new lending to first-time buyers in ROI.

(ii) Social and Affordable Housing
AlB supports the national housing agenda directly through various Government-led initiatives and
support for social housing through Approved Housing Bodies and to Affordable Housing in Ireland and registered providers of social housing in the UK. We currently track the performance measures set out below and AIB continue to track and monitor finance provided for social and affordable housing in Ireland and social Housing in the UK. We will also consider developing other metrics over time, to measure our performance within the housing value chain in Ireland. AIB provided €135m in new lending to fund social and affordable housing in ROI and £112m in new lending to fund social housing in the UK.

### Increased housing stock

AlB continued to support residential property development throughout the year, providing total facilities of €366m to support the development of new homes in Ireland and the UK. In terms of large-scale housing developments, the Group offer discounted loans to residential developers who adhere to an Irish Green Building Council (IGBC) benchmark that sets higher green building standards than those required under current building regulations.

Our social pillar also considers the importance of our people, who support our customers' financial needs and ambitions, and who also have their own needs that must be met. Our ability to operate and deliver our strategic commitments is closely tied to ensuring equal treatment and opportunities for our own workforce, with talent attraction and retention as a key risk. By having sustainability at the forefront of our plans, investing in employee development and fostering an inclusive workplace, we align our people strategy with our business goals to achieve long-term success and resilience.

We understand the importance of creating a workplace where all of our colleagues, irrespective of their origins, backgrounds, personality, life experiences and beliefs, feel empowered at work. Striving for equal treatment and opportunities for all of our colleagues means that we have a positive influence on:

- gender equality and equal pay for work of equal value;
- training and skills development;
- employment and inclusion of people with disabilities;
  - measures against violence and harassment in the workplace; and,
- diversity among our colleagues.

The Group continued to cultivate a culture of universal inclusion in 2024, through the implementation of our Inclusion & Diversity (I&D) strategy. The I&D Code recognises that we should respect, develop and harness the uniqueness of our workforce as well as embracing and celebrating our differences, in order to promote equal treatment and opportunities for all. The Code sets out the principles we live by and underpins our related I&D policies, handbooks, and a year-round employee engagement calendar of awareness and educational events. Our I&D council oversees the governance of I&D activity aligned to the strategy.

AIB has an ongoing target for Board of a minimum of 40% female representation. These targets have been reviewed by Board. AIB have maintained a gender balanced Board, ExCo and management in 2024. The Group's I&D code is publicly available at www.aib.ie/sustainability and the Board diversity policy targets are available at www.aib.ie/investorrelations.

Creating a culture of learning and development is part of our commitment to our colleagues, helping to attract and retain a talented workforce who share the same values. Providing our staff with training and skills development empowers them along their career journey, which ultimately helps us meet our decarbonisation ambitions and put our customers first.

We achieve this by creating a culture that promotes a sustainable work-life balance and universal inclusion, introducing variable pay for employees, and helping colleagues to develop and progress their careers, which has a positive impact on them.

If we fail to recruit and retain talent with specialised skills, or do not provide the necessary training and skills development for front-line staff, there is a risk we may not meet our sustainability commitments, such as the transition of our loan book. This may also affect our ability to serve our customers. Conversely, a rigorous approach to sustainability, such as our transition plan and actions to reduce carbon emissions, can help us to attract and retain a talented workforce that shares our values. We are pursuing this opportunity, which is integrated into our strategy via our Operational Efficiency pillar.

#### Our performance measures

- (i) Gender Diversity:
- One area of our I&D Code relates to gender. Having been an early signatory of Ireland's first Women in Finance Charter, we aim to have a gender-balanced ExCo, management and Board each year. Specifically, we target between 40% and 60% of female representation in ExCo and management, which is underpinned by the Equileap annual Gender Equality Global Report and Ranking's definition of 'gender balance'. In addition, AIB has an ongoing target for Board of a minimum of 40% female representation. We have maintained a gender balanced Board, ExCo and management in 2024.
- The Gender Pay Gap (GPG) is the difference in the hourly pay of men and women across the organisation. Our annual GPG report for AlB ROI, based on our snapshot date of 30 June 2024, shows a mean GPG of 17.8%. Since our previous GPG report in December 2023, there has been a 1.1 percentage point improvement. We also published a report for AlB UK, based on legislative snapshot date of 5 April 2024, with a mean GPG of 27%. Since our previous report in 2023, there has been a 1.3 percentage point improvement. Similar to last year, the primary reason for our GPG remains our organisational shape, with a significantly larger number of females in lower level roles, and higher numbers of males in more senior roles
- The highest-paid individual in our organisation is our CEO. The median annual total compensation for all employees (excluding the CEO) for 2024 was €60,406 and, the ratio of the annual total compensation of our CEO to the median annual total compensation of all employees (excluding the CEO) was 10.66.
- (ii) Training and skills development
- To support our colleagues in improving their sustainability knowledge, a completion rate of 90% is required each year for the mandatory 'Sustainability and AIB' training. The figure of 90% is derived from and aligned with the limit included in the RAS, which is reviewed annually by the Risk Compliance team and the Board Risk Committee and approved by the Board.
- The 'Sustainability and AIB' training course had a 94% completion rate in 2024. This includes all AIB employees and contractors, but not Payzone, Goodbody and AIB staff on long-term leave.
- (iii) Family Leave

In 2024, 100% of AIB employees are entitled to take family-related leave, with 19% doing so (23% of females and 13% of males).

Employees who took multiple types of family related leave during 2024 were only counted once. This avoids double-counting but means that the figures are a conservative view of how much family-related leave our employees took during 2024. These figures exclude Payzone and Goodbody.

For more information regarding characteristics of employees, and incidents, complaints and severe human rights, please refer to the Societal and Workforce Progress section of the Sustainability Reporting section of the AFR.

Our Societal Progress and Workforce Progress ambitions are enabled by AIB's Sustainability Strategy. We have made good progress in furthering our Social impact across our stakeholder community. Key deliverables include AIB's Social Bond Framework, supporting customers in financial difficulty, supporting vulnerable customers and enhancements to employee supports. Notwithstanding the progress we have made, our Societal & Workforce ambition, fuelled by stakeholder expectations, is to do more to meet both our strategic priorities and external obligations. Works are ongoing in this respect.

For more information please refer to the Societal and Workforce progress section of the Sustainability Report.

(c) Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities

As per Table 1 (d) an ESG Questionnaire is used in credit applications for borrowers identified as carrying increased transitional, environmental, social and/or governance related risk where the new lending is over  $\P$ /E 1 million. An ESG sectoral heat-map is used to identify the high risk sectors in scope for the questionnaire. The questionnaire has both generic and sector specific questions on a range of topics from Climate & Environmental risk specific matters to social considerations such as human rights and diversity to determine an ESG risk rating and also covers their supply chains. The questionnaire gets a better understanding of the ESG risk associated with the borrower and creates awareness among customers of the data that will be required from them around where they are in their ESG journey and plans going forward.

The Group Responsible Supplier Code sets out our expectation that our suppliers conduct their business in a fair, lawful, and honest manner with all their stakeholders, employees, subcontractors and any other third parties. It sets out our expectations of suppliers and the minimum standards they must meet on human rights, health and safety, supply chain, inclusion and diversity, and responsible and sustainable business. AlB suppliers must adhere to all legal obligations in each jurisdiction in which they operate or provide services, as well as any specific requirements included in our own policies. Key suppliers must attest annually to key policies (or clauses in them that are relevant to our supply chain). These include our Code of Conduct, Conflicts of Interest policy, Anti-Bribery & Corruption policy, Data Protection policy, Speak Up policy and our Human Rights Commitment. Our code was endorsed by our Chief Executive Officer. It is publicly available on our suppliers portal at www.aib.le/suppliers.

The Group's Credit Risk team develop and maintain policies designed to establish responsible lending practices. Core principles are also enshrined in policies for customers in arrears and the management of distressed credit to ensure that customers are treated fairly, objectively, sympathetically, and consistently. Key credit risk policies governing the funding we provide for housing finance include our Group Residential Development Policy, our ROI Residential Mortgage Policy (PDH and BTL), the UK Residential Mortgages Policy and our Social Housing Policy.

Our approach to protecting and preserving human rights is underpinned by our Human Rights Commitment. This commitment has been shaped by the United Nations Guiding Principles on Business and Human Rights and it is fundamental in guiding our strategic vision, operations and relationships with stakeholders. Our Human Rights Commitment operates alongside AlB's Code of Conduct and AlB's Responsible Supplier Code, and our commitments are aligned with those laid out in the laws applicable to the jurisdictions in which we operate, the European Convention on Human Rights and for our business in Ireland the EU Charter of Fundamental Rights. It was introduced in 2021, when it was approved by ExCo, and reviewed by SBAC and Board. In line with our Code of Conduct, we actively avoid causing, financing or contributing to any business activity that is known to breach human rights or fair practices, including taking steps to address any situations we come aware of where this has occurred. We will also, where practicable, align ourselves to the provisions of international treaties and other internationally accepted declarations and principles intended to protect human rights. We have due diligence processes in place to help us identify any material negative impacts or risks in relation to human rights, and same are an input to the DMA process. The Chief Strategy and Sustainability Officer is ultimately responsible for implementing our Human Rights Commitment, with the Sustainability Team providing support for designing and improving it. It is publicly available at www.aib.ie/sustainability.

AlB's Code of Conduct sets out clear expectations for how we behave and how we do business. The code guides our behaviours and emphasises our commitment to acting ethically, honestly and with integrity while demonstrating trustworthiness. It applies to anyone working in AlB. All employees are required to adhere to our code and complete a declaration of compliance with our code annually. In addition, annual e-learning on the code is mandatory for all employees. In addition, our wider policy suite exists to protect our employees and respect their rights. Additional supporting policies include: our Inclusion & Diversity Code; Anti-Bullying & Harassment Policy; Domestic Abuse Handbook; Whistleblowing Policy; and Grievance Policy. Our code was approved by our Board Audit Committee. Our Code of Conduct can be found publicly at www.aib.ie/sustainability.

We report annually on our approach to tackling modern slavery in our Modern Slavery Statement. The statement explicitly addresses trafficking in human beings, forced labour and child labour. Our statement was approved by our Board It is available at https://aib.ie/group/modern-slavery-statement

In 2023, AIB created a new Continuing Professional Development (CPD) Certificate in 'Understanding ESG for Business Customers' in association with the Institute of Bankers (IOB). The purpose of this training is to empower our colleagues to take action and build on their ESG knowledge and gives an overview of the particular challenges and opportunities facing businesses. On social issues, the course equips AIB teams with information on salient human rights considerations, social regulations, voluntary international standards, and explains how these topics may impact AIB customers.

Our Inclusion & Diversity ("I&D") Code recognises that we should respect, develop and harness the uniqueness of our colleagues as well as embracing and celebrating our differences, in order to promote equal treatment and opportunities for all. The Code sets out the principles we live by and underpins our related I&D policies, handbooks, and a year-round employee engagement calendar of awareness and educational events. Our I&D council oversees the governance of I&D activity aligned to our strategy. The Code outlines the scope of I&D and details what we expect from those who work at AIB and our suppliers. It highlights how to raise concerns and points to policies such as our Whistleblowing Policy and Grievance Policy, which support our Code of Conduct. The Code specifically covers the following grounds of discrimination: race (including colour, nationality, ethnic and national origin), religion or belief, age, disability, gender and gender reassignment, sexual orientation, marriage or civil partnership, pregnancy or maternity, family status and membership of the Travelling Community. We do not have specific monitoring in place; but our Whistleblowing and Grievance procedures allow colleagues to report behaviours contrary to the Code. Our code was approved by our Executive Committee. It is publicly available at www.aib.ie/sustainability

AIB Group Financial Crime Policy and related standards encompass anti-money laundering, countering the financing of terrorism, fraud, anti-bribery and corruption and sanctions. We have embedded the policy and standards in our operating procedures and we verify their content at least annually to ensure they are kept up to date. Any material updates require Board approval. We make all employees and Directors aware of our policies and standards and provide mandatory and bespoke training. Our statement on the Financial Crime Policy can be found on our website.

We communicate with our stakeholders on material topics, and there are remediation processes and channels for them to raise their concerns. In line with the specific requirements of ESRS S1, S3 and S4, AlB have processes in place to engage with our colleagues, our customers and the wider society and community regarding material impacts. Customers and the wider community can engage with us through our complaint management process, where their grievances are treated with confidentiality and respect. More details of this can be found in the Sustainability reporting section of the AFR.

#### Governance

(d) Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties' approaches to:

- Activities towards the community and society
- Employee relationships and labou standards
- Customer protection and product responsibility
- (iv) Human rights

Our strong governance structures are key to delivering our sustainability commitments. Our governance framework provides clear oversight and ownership of the Group's sustainability strategy and the management of Impacts, Risks and Opportunities (IROs) at Board and Executive levels.

This response outlines the roles and responsibilities of these bodies in relation to sustainability matters and business conduct, including their relevant skills and expertise. The Governance Report in the AFR provides details of their overall roles and responsibilities, composition and diversity as well as representation of employees (pages 124 to 135 and 155).

#### AIB Group Board

The Board is responsible for promoting the Group's long-term sustainable performance. It approves the Group's strategy and our financial and investment plans, which includes considering sustainability factors. The Board approves our sustainability targets as part of the strategic planning process. These targets then form part of the financial planning process across our core operating segments. The Board receives regular updates on the execution of the Group's sustainability strategy, enabling it to monitor performance against the sustainability targets. These reports include regular updates on People &Culture and bi-annual sustainability updates. The Board is also responsible for overall business conduct as detailed on page 130 of the Governance Report in the AFR. Our Board approved Code of Conduct supports the Group's values and helps us to deliver on our Group strategic purpose.

#### **Board Committees**

The Board is supported in discharging its duties by a number of Board and Advisory Committees. Part of their role is to oversee and challenge the Group's sustainability strategy and performance, while the Board retains ultimate responsibility, ensuring a robust approach. In relation to sustainability matters, the Board Audit Committee (BAC) oversees the quality and integrity of the non-financial disclosures, internal controls and mechanisms through which employees and contractors may raise concerns, in line with the scope of the Whistleblowing Policy. The Board Risk Committee (BRC) oversees and fosters sound risk governance across the Group, including ESG-related risks. The Sustainability Business Advisory Committee (SBAC) assists the Board in overseeing sustainability matters and supports the execution of the Group's sustainable business strategy, in accordance with the Group Strategic and Financial Plan. The Technology and Data Advisory Committee (TDAC) supports with the review and challenge of the strategy, governance and execution of matters relating to technology, data including cybersecurity, areas aligned to our material topics. The Nomination and Corporate Governance Committee (NomCo) ensures that the Board and Executive Committee are equipped with the necessary skills and diversity to effectively guide the group towards sustained success. The Remuneration Committee (RemCo) oversees the Remuneration Policy, including the variable remuneration scheme. Each Committee operates under Terms of Reference approved by the Board, as detailed in the Governance Report.

### AIB Group Executive Committee (ExCo)

ExCo is led by the Chief Executive Officer (CEO) and includes the managing directors of our four core operating segments. It provides input on the design, development and delivery of our purpose, strategy and values, and is responsible for our day-to-day operations. ExCo ensures we have an effective organisational structure, including the selection, motivation and direction of senior management, and oversees the execution of the strategy agreed with the Board, as well as the operational management, compliance and performance of all of the Group's businesses. ExCo is also responsible for maintaining an effective internal governance and control framework that includes a clear organisational structure and independent risk management, compliance and audit functions. In addition, it evaluates the effectiveness of the systems that ensure the integrity of our financial and sustainability information, as well as the soundness and effectiveness of risk management and internal controls.

ExCo operates under defined Terms of Reference and has full authority to delegate any of its powers, authority or activities to identified executives or to one or more of its sub-committees. In line with this, ExCo has established several sub-committees. The Chair of each sub-committee reports to ExCo on the key aspects of its work. ExCo oversees the sub-committees and regularly evaluates their effectiveness.

Group Sustainability Committee (GSC)
The GSC is chaired by our Chief Sustainability Officer. Its remit includes the effective fulfilment of strategic objectives and regulatory obligations, and our data strategy as it relates to ESG disclosures. It reviews and assesses current and emerging ESG risks, interacting with the Group Risk Committee (see below) on relevant matters. It also maintains relationships with key sustainability stakeholders, and ensures that the Group's portfolio of ESG products aligns to its sustainability agenda and strategy. The GSC oversees internal and external communications with stakeholders on the Group's approach to ESG matters. The SBAC receives updates on sustainability matters including the sustainability strategy, from Management, following review and recommendation from GSC. Additionally, the GSC manages and oversees the DMA process. The outcome of the DMA and any subsequent updates to it are communicated to SBAC and BAC on an annual basis.

#### Group Risk Committee (GRC)

The GRC is the senior management risk committee and is accountable to ExCo for setting policy and monitoring all risk types across the Group, to enable delivery of the Group's risk strategy. As part of this process, it receives updates on the effectiveness of the Group's policies and programmes related to identifying, managing and mitigating the Group's ESG risks, including Climate & Environmental (C&E) Risk, and ensuring compliance with regulatory requirements and industry standards. The GRC also approves the Climate and Environmental Policy. The BRC receives updates from the ExCo members following review at GRC, including the effectiveness of policies and programmes, which relate to identifying, managing and mitigating ESG risks, in connection with the Group's operations and ensuring compliance with regulatory requirements and industry standards.

#### Group Disclosure Committee (GDC)

The GDC oversees material Group disclosures. This includes recommending the disclosures in the sustainability statement for review to the BAC, ahead of recommendation to the Board for approval. As part of this, the GDC reviews the key judgements and estimates applied to sustainability disclosures, following their consideration by the GSC, as well as the clarity and consistency of the GSC's recommended response to new legal and regulatory requirements impacting Group ESG disclosures. To ensure completeness, sustainability disclosures are also shared with SBAC for information and feedback.

### **Group Conduct Committee (GCC)**

The GCC is responsible for oversight of issues in the Group. It seeks to promote and sustain a customer centric culture to demonstrate and evidence consideration of customer outcomes and to ensure that products and propositions are consistent with the Risk Strategy and Risk Appetite of the Group.

### Data, Analytics and Technology Committee (DATC)

The DATC is responsible for the governance, oversight and approval of all material aspects of the Group's data and technology activities, including the technology, data and analytics strategy, data quality, cyber, ethics and privacy standards.

Please see below for an overview of the policies in place for our three material topics under the Societal and Workforce pillar – Financial Wellbeing, Housing and Own Workforce (Equal Treatment and Opportunities for all).

### Financial Wellbeing

The Policies described in the Financial Wellbeing section of the AFR include our Product and Propositions Risk Policy and our Customer Vulnerability Guidelines, which are a key supporting document to the Group Conduct Risk Policy, for both personal and business customers. These policies apply to all employees, contractors, consultants, agents and third parties throughout the Group, in all jurisdictions who have direct or indirect access to our information or systems. They are applicable to all legal entities and subsidiaries in AIB Group, including Goodbody and. where relevant, our suppliers within our value chain. Payzone is not covered by these policies as it maintains its own suite of policies.

#### Housing

Policies governing our provision of finance for residential mortgages and residential developments, including Build-to-Rent (BTR), Private Rented Sector (PRS) and social housing developments. The policies cover all our customers in Ireland and the UK. We review each policy periodically, so that we can continue to meet our customers' housing needs and support Government- led initiatives. Each property lending policy adheres to relevant credit risk principals. They also comply with all relevant regulatory requirements, including the Consumer Protection Code, the Credit Reporting Act 2013, the SME Lending Regulations, the CBI Guidance on the Central Credit Register, the EBA Guidelines on Loan Origination & Monitoring, the Lending Standards Board Standards of Lending Practice (UK) and the Competition and Markets Authority's limitation on bundling (NI).

### Own Workforce (Equal Treatment and Opportunities for all)

Own Workforce (Equal Treatment and Opportunities for all)
The Policies described in the Financial Wellbeing section of the AFR include the Inclusion and Diversity
(I&D) Code, The Family Leave Handbook and Carer's Policy and the Anti-bullying and Harassment Policy.
Our I&D Code recognises that we should respect, develop and harness the uniqueness of our colleagues, as well as embracing and celebrating our differences, in order to promote equal treatment and opportunities for all. The Code sets out the principles that we live by and underpins our related I&D policies, handbooks, and a year-round employee engagement calendar of awareness and educational events. Our I&D council oversees the governance of I&D activity aligned with our strategy. The Code outlines the scope of I&D and details what we expect from those who work at AIB and our suppliers. It highlights how to raise concerns and points to policies such as our Speak Up Policy and Grievance Policy, which support our Code of Conduct.

More detail on all of the policies outlined above can be found in the Societal and Workforce section of

Our Board committees are kept regularly informed on material sustainability matters by relevant ExCo committees. This supports them in fulfilling their oversight and management responsibilities for our material IROs.

The Board and ExCo and/or their committees discussed a broad range of sustainability matters in 2024, including:

- Sustainability transformation and targets
  Mobilisation of CSRD and readiness for implementation
- DMA refresh exercise Development of the Social Agenda, including vulnerable customers
- ESG propositions Diversity & inclusion
- AIB's environmental footprints
- Regulatory engagement and expectations Employee communications on sustainability matters
- Sustainability Reporting
- Board succession planning, renewals, composition and diversity
- Stakeholder engagement Whistleblowing and the Code of Conduct
- Climate and environmental risk
- Conduct risk and Culture risk
- Cyber risk
- Corporate Governance
- Variable remuneration
- Operational efficiency & resilience
- Collaboration with community partners

(e) Integration of measures Our Board Committees are regularly informed by Management and ExCo subcommittees as detailed in to manage social factors response (d) above. and risks in internal governance Oversight of material sustainability matters Our Board Committees are regularly informed by Management and ExCo subcommittees as detailed above. This supports them in fulfilling their oversight and management responsibilities for our material arrangements, including the role of committees, IROs. As detailed in the topical sections within the Sustainability Statement in the AFR, we manage the the allocation of tasks material IROs that cut across our core operating segments through dedicated controls and procedures, including policies, actions, metrics and targets. For example, as the sponsors or owners of particular and responsibilities, and the feedback loop from risk management to the policies, Management and ExCo members are responsible for overseeing their effectiveness in addressing impacts and risks. We also manage and monitor impacts through our enhanced due diligence management body processes, as detailed below and in the Governance & Responsible Business section of the AFR. Our Principal risks are effectively managed through our risk management framework and internal controls, in accordance with the Three Lines of Defence (3LOD) model. More information on the 3LOD model can be found in section 2(f) below. The Board of Directors is ultimately responsible for the effective management of risks and for our system of internal controls as detailed from page 165 to 171 in the Governance Report in the AFR. The Board has delegated a number of risk governance responsibilities to various committees. Further details can be found from page 176 to 183 of the Risk Management section in the AFR. Opportunities are considered as part of strategic planning, including financial and investment plans. SBAC ensures that the DMA results frame our approach to developing our sustainability strategy, including major decisions and transactions. The Group monitors progress towards the Board-approved sustainability targets via the Climate & Environment Dashboard, which is reported quarterly to GSC and SBAC. The Group continues to work on integrating the processes, controls and procedures to monitor, manage and oversee material IROs within the specific Executive and Board committees and internal (f) Lines of reporting and The Group operates a three lines of defence model which defines clear responsibilities and frequency of reporting accountabilities and ensures effective independent oversight and assurance activities take place covering relating to social risk key decisions. The first line of defence lies with the business line who are required to have effective governance and control frameworks in place for their business and to act within the risk appetite parameters set out. The second line of defence comprises the Risk function, and oversees the first line, providing independent constructive challenge, setting the frameworks, policies and limits, consistent with the risk appetite of the Group. The third line of defence comprises Group Internal Audit who provide an independent view on the key risks facing the Group, and the adequacy and effectiveness of governance, risk management and the internal control environment in managing these risks. An update on the social agenda is provided to GSC and SBAC at a minimum on an annual basis to facilitate the oversight of the social agenda from a Group perspective. Please see 2(d) and 2(e) for more information on the lines of reporting and frequency of reporting relating to social risk. (g) Alignment of the In 2023, AIB established a variable remuneration scheme based on company performance. The scheme remuneration policy in comprises of three financial measures accounting for 60% of the outcome, and three non-financial line with institution's measures accounting for 40% of the remuneration calculation. The non-financial measures relate to social risk-related gender balance, customer satisfaction and green finance. Each component has an equal weighting of objectives 13.33%. The three non-financial measures align with our material topics, with green finance as the climate related consideration. Currently, performance is not assessed against GHG emission reduction targets. As part of the DMA ("DMA") we have identified a positive impact on our colleagues in relation to the variable remuneration scheme as evidenced in our equal treatment and opportunities for all material topic. Further details on variable remuneration are included in the Governance Section of the AFR. 2024 was the first year of variable remuneration payments to colleagues and healthcare benefits also became available during the year. In line with the easing of some Government restrictions in December 2022 and the Group's return to majority private ownership, we updated our Remuneration Policy to reflect our provision of healthcare benefits for all AIB employees from January 2024 and the introduction of a measured variable remuneration scheme, based on performance targets across the business in 2023, made payable in the

remuneration policy, including the variable remuneration scheme.

first half of 2024. The new benefits and updated Group remuneration policies and practices promote long-term success for our organisation. The Remuneration Committee (RemCo) oversees the

### Risk management

Definitions, (h) methodologies and international standards on which the social risk management framework is based

Our DMA identified the sustainability matters which we believe have the most impact for our stakeholders, including the risks and opportunities arising from our strategy and business model. Under the ESG strategic pillar of Societal and Workforce, the Group has identified the below as areas of focus for 2024-2026

- Put our customers first, always treating them fairly and with respect.
- Continue to proactively contribute to a robust and sustainable economy and society.
- Empower our workforce and foster a safe, inclusive and supportive work environment.
- Support our communities and local initiatives in a sustainable way.

To ensure progress is made against the Sustainability agenda, the Group has set clear targets and objectives which are actively monitored and measured and set out annually in the Sustainability Report. Our material topics under societal and workforce progress are highlighted below:

- Housing
- Financial wellbeing

 Own Workforce (Equal reatment and opportunities for all)
 Our societal and workforce pillar is aligned with the UN Sustainable Development Goals 1, 4 and 11.
 More detail on these material topics can be found in 2(a) and (b) above and in the societal and workforce section of the AFR

We also comply with the UK Modern Slavery Act and publish a statement on an annual basis outlining how we mitigate Human Rights breaches in our Supply Chain.

The purpose of our Social Bond Framework is to enable AIB, or its subsidiaries, to issue social bond instruments, which may include covered bonds, senior bonds (preferred or non-preferred), subordinated bonds and medium term notes, to finance and/or refinance social eligible loans with a positive societal benefit. Our Framework is based on the ICMA Social Bond Principles 2021, including the updated Appendix I of June 2022, and defines the portfolio of loans eligible to be funded by the proceeds of Social Bonds issued by AIB. The Group Sustainability Committee approves material Social Bond Framework updates, as well as social bond allocation and impact reports. Our Framework is approved by both the Group Sustainability Committee and Treasury Management Risk Board and is publicly available at https://aib.ie/investorrelations/debt-investor

Socially Responsible Investment Bond Framework
Socially Responsible Investment (SRI) Bond portfolio funds domestic and international projects aimed at
global sustainability, carbon emissions reduction and social improvement, all under the over-arching
themes of ESG. We will look more favourably upon issuers who actively engage in the world of socially responsible investment and demonstrate strong environmental, social and governance practices. We will also look favourably upon issuers whose issuing frameworks reference the UN Sustainable Development Goals (SDGs). It is publicly available at www.aib.ie/sustainability

### Sustainable Lending Framework

The SLF provides transparency on the criteria that we employ when classifying and reporting on green, transition and social lending, to help us achieve our ambition that 70% of new lending should be green or transition by 2030. The policy is a Group-wide framework and is available on the AIB website. Lending across all of our business units and geographies is within the scope of the SLF. It supports our sustainable lending to further energy efficiency and renewable energy development. We developed and implemented the SLF in July 2021 to comply with the EBA guidelines on Loan Origination and Monitoring. The guidelines defined in the SLF, to classify new lending as Green or Transition lending, aim to be aligned to the greatest extent possible with the technical criteria outlined in the EU Taxonomy regulation for relevant activities. As further work is completed to consider the full implications of reporting under the EU Taxonomy and, in particular the Green Asset Ratio, we expect our approach to evolve and mature.

### **Equator principles**

In October 2021, AIB signed up to the Equator principles. As a signatory to the Equator Principles, all lending under AIB's Group Project Finance Policy is required to comply with the Equator Principles, and, therefore, the applicable procedures have been updated for in-scope project-related finance transactions to consider all aspects of Equator Principles in the identification, assessment, categorisation, management, and reporting requirements of the principles. Under the Equator Principles, projects can be categorised into A, B+, B or C. Projects that are deemed to be a Category A & B+ are projects with potential significant environmental and social risk, whereas Category B & C projects have limited adverse and minimal adverse environmental and social risk, respectively. AlB successfully implemented the Equator Principles across the relevant business units in the bank and submitted an Implementation Plan to the Equator Principles Association in July 2023.

# **Human Rights Commitment**

Our approach to protecting and preserving human rights is underpinned by our Human Rights Commitment, which is available on our website. This commitment has been shaped by the United Nations Guiding Principles on Business and Human Rights and it is fundamental in guiding our strategic vision, operations and relationships with stakeholders. Our Human Rights Commitment operates alongside AIB's Code of Conduct and AIB's Responsible Supplier Code, and our commitments are aligned with those laid out in the laws applicable to the jurisdictions in which we operate, the European Convention on Human Rights and, for our business in Ireland, the EU Charter of Fundamental Rights. It was introduced in 2021, when it was approved by ExCo, and reviewed by SBAC and Board.

Our disclosures with reference to the Global Reporting Initiative (GRI) framework, United Nations Environment Programme Finance Initiative (UNEP-FI) Principles for Responsible Banking and the Equator Principles can be found on our website.

(i) Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels

The Group uses a comprehensive risk management approach across all risk types. This is outlined in the Group's risk management framework, including the key practices that are implemented in managing risks, both financial and non-financial. The framework is reviewed, updated and approved by the Board at least annually to reflect any changes to the Group's business or consideration of external regulations, corporate governance requirements and industry best practice. The Group's independent Risk function designs and maintains the framework. The Risk function is led by the Chief Risk Officer who provides oversight and monitoring of all risk management activities.

AIB carries out an annual Material Risk Assessment (MRA) where risks such as Climate & Environmental (C&E) Risk are identified, assessed, managed, monitored and reported upon. The MRA is an annual top-down process, identifying the Group's material risks in line with the Group's Risk Management Framework. Please see the Risk Management Report in the AFR and 2(a) above for more details on this process.

Regular monitoring of ESG-related regulatory and legal developments is in place across different areas of the Group to ensure suitable consideration and appropriate action is taken and the Regulatory Compliance team is responsible for independently identifying and assessing current and forward-looking compliance obligations, including regulation and guidelines in relation to ESG-related matters.

ESG Sectoral Risk Heatmap is a qualitative approach to identifying priority risk sectors areas for ESG impact assessment. The Group has incorporated an improved ESG questionnaire into our risk assessment process, covering also their supply chains. The ESG Questionnaire is used in credit applications for borrowers identified as carrying increased transitional, environmental, social and/or governance related risk where the new lending is over €/£ 1 million. The ESG sectoral heat-map is used to identify the high risk sectors in scope for the questionnaire. The questionnaire has both generic and sector specific questions on a range of topics from Climate & Environmental risk specific matters to social considerations such as human rights and diversity to determine an ESG risk rating. The ESG questionnaire output is an additional factor for consideration in the credit decisioning process.

In 2022 we broadened the parameters of our human rights due diligence pilot to cover Retail banking, HR, and IT alongside Corporate Lending and Procurement, recognising our responsibilities as an employer, procurer and provider of banking services. Information was gathered about potential human rights impacts documentation. Over a series of workshops, surveys and interviews with internal and external stakeholders a long list and then a short list of human rights issues was developed. In 2023 we incorporated an improved ESG Questionnaire into our supplier risk assessment and, in 2024, into our ESG risk assessment of larger business customers.

In line with our Group strategy and to meet regulatory expectations on our sustainability practices, we at AIB Group continue to improve our reporting against the targets we have set across all elements of ESG as part of our strategic growth. Since 2016, we have engaged with our stakeholders to identify the issues that are material to them and have reported in line with those issues. In 2023, we carried out a 'double materiality' assessment and the final results were then brought through –and challenged by – appropriate governance, culminating in review by the Sustainable Business Advisory Board ("SBAC"). In 2024, we began a new three-year strategic cycle and our Climate Capital segment became fully operational. We reviewed the DMA, as required by ESRS, and concluded that the foundational work from 2023 continues to provide a reliable basis for our sustainability reporting and strategic decision-making processes. Through the 2024 review, we identified 'Own workforce (Equal treatment & opportunities for all)' as an additional material topic. We also merged two environmental topics, 'Responsible lending and investment' and 'Climate change adaptation' into one topic, 'Climate change', and two social topics, 'Financial inclusion and well-being' and 'Customer banking experience' into one topic, 'Financial well-being'.

The SLF provides transparency on the criteria that we employ when classifying and reporting on green, transition and social lending, to help us achieve our ambition that 70% of new lending should be green or transition by 2030. The policy is a Group-wide framework and is available on the AIB website.

Our Socially Responsible Investment (SRI) Bond portfolio funds domestic and international projects that are aimed at global sustainability, carbon emissions reduction and social improvement, all under the overarching themes of ESG. AlB promotes and supports the transition to a more sustainable global economy and contributes to positive environmental and social change via investment in green, social and sustainable bonds. The SRI Bond portfolio reached €2.67bn at year-end 2024.

AIB will continue to support transition efforts that are aligned with our strategy and decarbonisation ambitions and engage with organisations to ensure that we can support positive change. To help drive this agenda, we have joined a multitude of voluntary organisations, including the Carbon Disclosure Project (CDP), SBTi, Net Zero Banking Alliance (NZBA), UN Global Compact, and the World Banking Council for Sustainable Development (WBCSD).

and assets contributing to mitigate social risk

Activities, commitments | The following examples demonstrate the Group's activities and commitments to mitigate social risks:

Supporting Housing

Housing is a strategic priority for AIB, representing 51% of our loan portfolio. We lend to first time buyers and finance social housing that benefits the wider community. This in turn supports people's ability to achieve financial stability and security, influencing their quality of life and well-being. We contribute to meeting the national need for housing by financing housing developments, and offering finance to purchase homes, in societies in which we operate. Through our Customer First and Sustainable . Communities strategic pillars in particular, our housing strategy contributes to a robust and sustainable economy and society.

AIB supports the national housing agenda directly through various Government-led initiatives and support for social housing through Approved Housing Bodies and to affordable Housing in Ireland and registered providers of social housing in the UK. In 2024, AIB provided €135 in new lending to fund social and affordable housing in the ROI and €112 in new lending to fund social and affordable housing in the UK. AIB have made a commitment to deliver more than €6bn of cumulative new lending to first time buyers by 2026. In 2024 we made substantial progress by providing £2.79bn in new lending to first time buyers. AIB continued to support residential property development throughout the year, providing total facilities of €366m to support the development of new homes in Ireland and the UK.

#### Customers in Vulnerable circumstances

Our Customer Vulnerability Guidelines support us in managing conduct risk relating to customers in vulnerable circumstances. The guidelines are a key supporting document to the Group Conduct Risk Policy, for both personal and business customers. The guidelines recognise that when our customers are experiencing vulnerable circumstances, they may be significantly less able to represent their own interests and more likely to suffer harm, and therefore require additional support.

We aim to continue to have a positive impact on our customers in vulnerable circumstances. The support we offer include:

- A dedicated additional support helpline for customers and carers which received 10,511 calls in 2024.
- An additional support flag system which assists us in providing continuous assistance to customers in need.
- A dedicated internal vulnerable customer support team.
   Automated Teller Machine ("ATM") accessibility, which we implemented across our ATM network, with voice-guided functionality enabled on all our ATMs, and cash and cheque lodgement machines, supporting cash withdrawals, balance enquiries, mini statements and PIN services
- A full annual training and awareness programme for colleagues, covering customers in vulnerable circumstances with 42334 number of hours of training completed.
- We accept calls from sign language interpretation services, IRIS in Ireland and SignLive in UK.
- Providing bank statements in braille or large print in Ireland and UK, with additional services for customers with sight and hearing difficulties expanded to the UK via our partnership with SignLive, and to Northern Ireland in partnership with the Royal National Institute of Blind People to provide braille and large print offerings. In the UK customers who are deaf, hard of hearing or with a speech impairment can contact us using the Relay UK Service
- A language translation and interpretation service, which we implemented in 2024, providing ondemand branch access to an interpreter in over 120 languages.
- Inclusive banking, with AIB proud to be JAM Card Friendly in Ireland and UK, and Dementia Inclusive in Ireland. In addition, in 2024, we obtained Autism Friendly Accreditation for several of our AIB branches.
- Gambling block, which we implemented in 2024, allowing customers in Ireland and the UK to request a block on debit cards and credit cards in Ireland for gambling transactions through the Additional Support Helpline.
- AIB UK domestic abuse supports, which has provided a Domestic Abuse Exception Process since 2023 to support existing personal customers and staff who may have a poor credit score due to a domestic abuse situation.

In 2021, AIB became the first Irish bank to publish a Social Bond Framework. In 2022, we became the first Irish bank to issue a social bond and have since issued another in January 2023, raising a total of €1.75bn. Social bond proceeds are allocated to financing projects with clear social benefits, such as social and affordable housing and healthcare infrastructure.

### Financing Healthcare

Healthcare is a sector of strategic and social importance to AIB with dedicated healthcare teams in our ROI and UK businesses. Regularly publicly awarded and recognised for excellence in healthcare financial services delivery, AIB teams are focused on providing financial solutions that are helping to address healthcare needs and service access within our communities. AIB provides loans and services to support hospitals, primary care centres, residential care for the elderly and citizens with challenged healthcare

# Supporting Businesses and Entrepreneurship

We are committed to supporting businesses of all sizes. Through our partnership with the SBCI, we offer the Growth and Sustainability Loan Scheme. This is a long-term, low-cost loan scheme to support our customers in business and agriculture. There are two loans offered under the SBCI Growth and Sustainability Loan Scheme. The Climate Action & Environmental Loan's available to businesses who qualify as a green enterprise or are investing in green measures. The 'Growth and Sustainability Loan'scheme is for long-term investments in the business' growth and resilience. The SBCI operates the scheme, which benefits from a guarantee from the European Investment Bank Group and support from the Department of Enterprise, Trade and Employment and the Department of Agriculture, Food and the Marine. We continue to be focused on the long-term sustainability of our business customers. In 2024 we launched our new Transition Finance Guidance to assist with the classification of financing as transition and is complementary to our SLF in supporting our corporate customers.

Universal inclusion

We continued to cultivate a culture of universal inclusion in 2024, through the implementation of our I&D strategy.

- We delivered mandatory online I&D training, to help our employees to understand the
- behaviours we expect and how they can raise an issue.

   We also provided specialist training on I&D for our ExCo and their senior management teams, supported by coaching sessions, to facilitate consistent awareness of I&D considerations and empower senior leaders to support our I&D goals.
- We held our third annual Universal Inclusion Campaign, to promote an inclusive workplace in AIB, one where diversity is embraced and everyone can reach their full potential. This included a keynote interview with the CEO of Special Olympics International, Mary Davis. Teams across AIB also held discussions on I&D and made a commitment to progress I&D actions in the year ahead.
- AIB has an Inclusion & Diversity Council, made up of leaders from across the organisation and chaired by an ExCo member, that helps coordinate and implement Inclusion & Diversity efforts and deliver on our commitment to a culture where all employees can perform at their best and reach their potential.
- Our leadership programme had a 53% female participation in 2024. It has an inclusive leadership module that fosters an environment conducive to progress regarding gender and all groups at risk of
- To better understand the barriers to female progression and what the culture is like for women in AIB, we conducted a Women in Leadership diagnostic. The research included interviews with key stakeholders and larger focus groups from various levels and areas of the Bank. As a result, we compiled a roadmap of short-, medium-, and long-term actions, which we will continue to develop and embed in our people strategy for 2025 – 2026.

#### Employee networks

Our range of networks, as follows, celebrate the diversity of our colleagues and play an important role in fostering an inclusive workplace by promoting awareness, support, and collaboration among employees.

- With the support of our Women's+ Network, we have targeted programmes to empower women at all levels in AIB. The programmes focus on developing leadership, technical skills and career progression strategies. For example, our Mentor Her programme helps mentees to better command their own career path through their mentor's support and contacts across the broader mentee group. Our 2024 programme featured 194 mentors and mentees.
- We updated our Origins+ Network Ally pack in May 2024. This Ally pack and the I&D Guides support our colleagues in having open conversations. The Network raises awareness of the experiences of people from ethnic minority groups and celebrates all our employees' heritage.
- Our Pride+ Network organised a variety of events for our colleagues, such as a panel discussion with members of the Pride+ network on their lived experiences, and a workshop delivered by Belong To LGBTQ+ Youth Ireland, which helped us understand the things we can do in the workplace, at home or with friends to be better allies.
- Our Abilities+ Network raised awareness around several global initiatives, such as using Autism Awareness Month in April to roll out volunteering opportunities and education for AIB employees, to improve accessibility for both our customers and our people. During ADHD Awareness Month in October, a colleague shared his experience of living with ADHD and the support that is available. Many other events were highlighted, such as World Down Syndrome Day, International Day of Sign Languages, World Sight Day and the UN International Day of Persons with Disabilities.
- Our Life & Family+ Network partnered with Family Carers Ireland to provide a support package to our working carers, including one-to-one access to expert guidance and support. In 2024 the Network supported them in hosting a panel discussion on caring for older persons and family members with an intellectual disability and on how to recognise carer burnout.

### Family Leave

We have also continued to enhance our progressive policies that support inclusion and gender balance. In August 2024, the Irish Government increased the statutory parent's leave entitlement from seven to nine weeks for each parent. AIB topped this up to full pay for employees in both ROI and the UK. To launch this, we organised interviews with both a male and female colleague on their experiences of this leave, how they used it and what it meant for them and their family. In addition, a positive change in Irish legislation in 2024 means that employees who are on maternity leave and require treatment for a serious medical reason can now postpone all or part of their leave for a period of up to 52 weeks. AIB also extended this to include surrogacy leave, so that that employees will not have to use their leave during treatment and can use it at a later date.

# Trainings and skills development

AIB has several initiatives in relation to training and skills development.

- We support the further education of our employees by covering eligible fees and study leave
  where necessary. This includes support for various courses, including post-graduate programmes and
  role-specific qualifications, such as the Professional Certificate/Diploma in Financial Advice (APA/QFA), Chartered Banker Institute courses in the UK, and ACCA or CIMA courses for accountants.
- We offer Continuing Professional Development (CPD) Certificates accredited by the Institute of Bankers (IOB). In particular, 'Understanding ESG for Business Customers' empowers our client-facing colleagues to take action and build their ESG knowledge.

  • Our colleagues have access to the AIB Sustainability Academy, which is a hub for all ESG learning,
- signposting sustainability resources and education opportunities. It aligns with our purpose to empower colleagues to build a sustainable future and equips them to more effectively engage with and support customers and suppliers as they navigate their sustainability journey.
- In 2024, we enhanced our Invest in You celebration of career development, increasing its frequency from a once a year to three times a year. This year's theme was 'Pave Your Pathway', aiming to help all employees to drive their careers and development plans. The virtual and in-person events included sessions on Building Your Confidence, Emotional Intelligence and Career Sessions

For more information please refer to the Societal and Workforce progress section of the Sustainability Report.

for identification and management of social

Implementation of tools ESG Risk Identification & Assessment Tools

MRA and DMA

AlB considers ESG risk drivers and how they impact our business model. Risk is identified and assessed in the Group through a combination of top-down and bottom-up risk assessment processes. Top-down and bottom-up views of risk come together through a process of upward reporting of, and management response to, identified and emerging risks. This ensures that the Group's view of risk remains sensitive to emerging trends and common themes. In addition, the Group also uses heatmaps, scenario analysis and stress testing to inform the risk identification process and understand the short and long-term risks to the business model for a selection of ESG risk drivers. A range of quantitative and qualitative tools and metrics are used to monitor our exposure to ESG risks. The nature and depth of these tools and metrics are expected to evolve and mature over time. Please refer to section 2(i) for more details on the processes to identify, measure and monitor activities and exposures sensitive to social risk.

In 2023, we carried out a DMA ("DMA") process to identify and assess our material sustainability matters from an impact and financial materiality perspective. From an impact materiality perspective, we define impacts as the positive or negative effects we have or could have on people and the environment, connected with our own operations and our upstream and downstream value chains across shortmedium-, or long-term. Impacts are linked to our products and services, as well as to our direct and indirect business relationships, for example through our clients' value chains. From a financial materiality perspective, we define risks and opportunities as the financial effects that affect, or could reasonably be expected to affect, our financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium and long term. Collectively the impacts, risks and opportunities are referred to as IROs. Three social topics were identified, namely: Financial Wellbeing, Housing, and Equal Treatment and Opportunities for All (in own workforce). Details of the associated IRO's are available within our Sustainability Statement in our 2024 AFR.

United Nations Environment Programme Finance Initiative ("UNEP FI") Portfolio Impact Analysis

The United Nations Environment Programme Finance Initiative ("UNEP FI") Portfolio Impact Analysis Tool is used to help Bank's to identify the areas in which they have the most significant impact. It takes into consideration national needs across twenty impact areas. As Ireland is our most significant location of operation, we focused on the national needs of Ireland. The impact analysis completed points to a lack of housing supply to buy or rent in the private sector, high cost of building, and affordability of house prices as a high need nationally and has led to negative economic and social implications for Ireland, as lowincome people, youth and non-homeowners are most affected. Considering the impact areas with highest or very highest need for Ireland, along with the profile of our business, we determined that where AIB can make the most significant impact, include climate change and housing. Under PRB we set two SMART targets - one for climate and the other for housing. Our housing target relates to providing lending approvals that support the provision of social housing in Ireland.

Whistleblowing Policy

Under our Whistleblowing Policy, our colleagues are encouraged to speak up when they have a genuine belief that an actual or suspected wrongdoing may have occurred, is occurring or will occur at work, either in or for AIB. Employees can raise concerns with their People Leader in the first instance or through confidential Speak Up channels, such as the AIB Integrity Line, a secure web-based system hosted by an independent third-party. The Whistleblowing Policy applies to all those working in or for AIB Group in any jurisdiction. All issues raised are treated promptly and with the highest confidentiality. The effectiveness of the policy and the processes are monitored and reviewed by BAC. For more details, please refer to page 105 in the Governance & Responsible Business section of this statement.

Grievance Mechanisms

Those who are directly employed by AIB can also raise concerns in relation to personal grievances, employment-related concerns, bullying and harassment complaints, or complaints as a customer through the appropriate channels, namely, the Grievance Policy, and the Anti-Bullying & Harassment Policy, with the Customer Care team, or directly with their People Leader. The Chief People Officer is ultimately responsible for the implementation of the Grievance Policy, which is available on AIB's website Our Workforce Performance Team is responsible for monitoring and tracking formal grievance complaints. The HR Policy team and the Workforce Performance Team review the Grievance Policy regularly, in consultation with stakeholders, to address regulatory, legislative, business, management and best practice requirements. The Grievance Policy complies with the codes of practice in Ireland, Great Britain and Northern Ireland. To facilitate the effectiveness of the Grievance process, we take the following

- 1. Formal grievances are recorded on a personal case register.
  2. A dedicated Grievance & Disciplinary decision-maker panel facilitates the independence and effectiveness of the channel. All appeals are heard by either the CEO or their appointed nominee for
- 3. The investigator is assigned a dedicated case manager, who oversees that the process is followed correctly and that fair procedures are adhered to. AIB employees and contractors in Ireland and the UK are required to complete annual training on the Code of Conduct, which includes key responsibilities related to the Grievance Policy. The Group Accountability & Performance team issues reminders and People Leaders regularly communicate with their teams on the importance of understanding and complying with the Code of Conduct.
- **Human Rights Risk Identification tools** We are currently updating our training modules, policies and procedures to enhance our human rights processes. We will systematically engage stakeholders and conduct periodic reviews to risk map potential issues, as new information on potential impacts becomes available.

AIB will continue to support transition efforts that are aligned with our strategy and decarbonisation ambitions and engage with organisations to ensure we can support positive change. To help drive this agenda, we have joined a multitude of voluntary organisations, including the Carbon Disclosure Project (CDP), Science Based Targets Initiative (SBTi), Net Zero Banking Alliance (NZBA), UN Global Compact, and the World Banking Council for Sustainable Development (WBCSD).

(I) Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits

The Group Credit Risk Policy includes a list of excluded business activities that are considered to be incompatible with Group strategy due to, amongst other things, negative social impacts associated with animal welfare, healthcare/genetic engineering, adult entertainment and surveillance/arms-related/military. The policy rule prohibits providing new money for any lending facilities to businesses, or any of their subsidiaries, involved in the excluded business activities. This rule applies to all business customers with a Gross Connected Exposure of > €/£300k and who are relationship managed. Our policy was approved by our Board. The list of excluded activities is publicly available at ww.aib.ie/sustainability.

Refer to response (b) for details of the key performance measures associated with the Societal and Workforce pillar of our Sustainability Strategy and response (k) for details of the risk identification and escalation mechanisms in place.

(m) Description of the link (transmission channels) between social risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework

Enhanced risk management of climate, environmental and wider ESG risks is an important component of the sustainability strategy. As outlined in response (a) and (k) the Group undertakes risk assessment activities on an annual basis with the outcomes of risk management processes such as the MRA are an important input factor to the DMA process, informing alignment and calibration of results. The Group is continuously working on integrating the DMA process, including the identification of risks and opportunities, in the overall planning, risk management and internal controls as applicable. Details of the connectivity between our DMA and MRA processes are detailed with the Sustainability Reporting section of the AFR

In 2023, we carried out a DMA process to identify and assess our material sustainability matters from an impact and financial materiality perspective. From an impact materiality perspective, we define impacts as the positive or negative effects we have or could have on people and the environment, connected with our own operations and our upstream and downstream value chains across short-, medium-, or long-term. Impacts are linked to our products and services, as well as to our direct and indirect business relationships, for example through our clients' value chains. From a financial materiality perspective, we define risks and opportunities as the financial effects that affect, or could reasonably be expected to affect, our financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium- and long-term.

#### DMA Process

Step 1 – The Group analysed our strategy and business model to inform the context for the DMA, including the key markets in which we operate and the sector exposures associated with our financial products and services. We mapped our value chain by considering the direct and indirect business relationships that we depend on and identified key internal and external stakeholders. In line with the ESRS guidance we categorised them as affected stakeholders or users of the sustainability statement. Understanding these relationships helped us identify and assess the impact of these stakeholders in our value chain and the risks and opportunities posed to our business, as developed in the following steps.

Step 2 – Identification of the list of sustainability matters The ESRS provides a list of sector-agnostic sustainability matters to consider. To ensure a comprehensive assessment that took the nature of our business into account, we examined additional inputs to identify potential sector and entity-specific topics across different categories. These inputs were: 1. Peers and competitors; 2. ESG-focused regulations relevant for AIB; 3. ESG frameworks; 4. Media; 5. Industry publications; 6. Company documents. For each category, we scored topics based on their frequency and relevance to our business. This resulted in a list of 24 preliminary material sustainability topics across our ESG pillars, which were challenged and reviewed by Sustainability Transformation Steering Committee.

Steps 3 & 4 – Assessing impact and financial materiality Through desktop research, we identified the IROs for each of the 24 topics identified in step 2. The desktop results were complemented by input from our colleagues. Identifying impacts - we categorised all identified impacts as positive or negative, actual or potential. Social impacts were informed by company documentation, insights from the due diligence process and existing stakeholder engagement output. We considered impacts on our employees associated with our operations. In relation to our customers and the wider society and community, we considered the direct and indirect impacts associated with our lending and investment activities. Environmental impacts relate to climate change, pollution, water and marine resources, biodiversity and ecosystems, and resource use and circular economy. To understand how they relate to our business activities, sector exposures and geographical locations, we consulted company documents and publicly available databases such as UNEP-FI. We also consulted representatives of non-governmental organisations representing the views of affected stakeholders, and those regarding nature. Impacts related to business conduct were considered in relation to our own operations and the associated impacts for stakeholders along the value chain. They were mainly informed by the regulatory framework in place. The correlation between negative impacts and risks was considered, particularly their potential to trigger regulatory and reputational risks for the Group

### Identifying risks and opportunities

After identifying impacts across the ESG pillars, we considered risks and opportunities, including factors that could trigger them, such as impacts, or dependencies on business relationships and natural resources. For example, the impact of transitioning our business model to support a low-carbon economy could lead to transition risks associated with exposure to high GHG-emitting sectors. At the same time, this transition presents opportunities to develop and finance green products, thereby growing our business.

Opportunities were mainly informed by desktop research and strategic documentation. The outcome of the DMA, including opportunities identified, inform the strategic orientation for the Group.

Risks were considered in relation to physical and transition channels related to our operations and value chain. To ensure overall alignment, the existing risk management processes were an important input factor to the DMA. We conducted the analysis through desktop research, including analysis of the Material Risk Assessment (MRA) framework (see page 57 for more details), Annual Reports, Pillar 3 disclosures and credit rating reports.

Assessing the materiality of IROs

After the IROs were identified, our colleagues from across different areas, including subsidiaries and entities, assessed them based on the impact and financial materiality parameters prescribed by the ESRS. The scoring methodology was defined on a scale of 0-5, ranging from not material to critical, including a time horizon lens of short-, medium and long-term.
In line with impact materiality parameters, impacts were assessed based on:

- Scale: we assessed how grave the negative impact is, or how beneficial the positive impact is, for people or for the environment.
- Scope: we assessed how widespread the negative or positive impacts are. For environmental impacts, the scope may be understood as the extent of environmental damage or a geographical
- perimeter. For impacts on people, the scope may be understood as the number of people affected.

   Irremediable character of the impact: for negative impacts, we assessed whether, and to what extent, we could remediate the impacts by restoring the environment or affected people to their prior state.
- Likelihood: for potential impacts, we assessed how likely the impact is to occur. In line with financial materiality parameters, risks and opportunities were assessed based on:

  Magnitude of the financial effect: the potential current or anticipated financial effect of the risks
- and opportunities.
- Likelihood: how likely a risk or opportunity is to occur.

### Assessing human rights impacts

For human rights impacts, the severity of the impact takes precedence over its likelihood. While we identified certain potential negative impacts, their severity scored below our materiality threshold. Severity comprises scale, scope and the irremediable character of the impact. However, the right to privacy is recognised by the Universal Declaration of Human Rights and falls within 'Cyber security and data protection', which is a material topic for AIB. Our Human Rights Commitment also compels us to safeguard our customers' right to privacy.

#### Consolidation of results

To arrive at a prioritised list of material topics, the input received by our colleagues and the input received by our stakeholders was consolidated. The consolidated results were validated through a series of working sessions. We prioritised material topics, and their corresponding IROs, based on their final score and materiality threshold.

Step 5 – Validation and sign-off In terms of the decision-making process and the related internal controls procedures, the overall process is overseen by our senior management through the GSC, which reviews, challenges and validates the results of the DMA. Prior to review by the GSC, the consolidated results were validated by our colleagues and approved by the Sustainability Transformation Steering Committee. We also organised separate validation sessions with representatives of external stakeholder groups, as detailed above. As a final step, the DMA results were noted by SBAC, BAC and the Board.

As a result of the DMA process we have identified seven material topics:

- Climate change, Own workforce (Equal treatment & opportunities for all), and Cyber security & data protection are material from both impact and financial (risk and opportunity) perspectives
- Culture & reputation is material from a financial perspective only (risk).
   Financial wellbeing, Housing and Governance, ethics & accountability are material from an impact perspective only. Details on the corresponding material IROs for each topic are included in Our Material Impacts, Risks and Opportunities on pages 58 to 61 within the Sustainability Statement in the

Where material risks and opportunities were identified through the DMA process, further analysis was conducted to determine whether they resulted in current financial effects. As noted above, the right to privacy is recognised by the Universal Declaration of Human Rights and falls within 'Cyber security and data protection'.

Cyber risk is a top and emerging risk for the Bank during 2024, due to its constantly evolving nature as well as the increased frequency, sophistication, impact and severity of cyber threats. In 2024, our overall cyber security spending was 10.33% of our total IT spending which is a subset of the Total Operating Expenses. For more detail, please refer to note 10 to the Consolidated Financial Statements in the AFR.

# Management of Material Sustainability Matters

We manage the material IROs that cut across our core operating segments through dedicated controls and procedures, including policies, actions, metrics and targets. For example, as the sponsors or owners of particular policies, Management and ExCo members are responsible for overseeing their effectiveness in addressing impacts and risks. We also manage and monitor impacts through our enhanced due diligence processes, as detailed below and in the Governance & Responsible Business. Details of all policies that are used to manage and mitigates the IROs are detailed in the 'Our Policies' section for each of our material topics in the Sustainability Statement in the AFR.

Some key policies and frameworks that support the day to day management of the interaction between social factors and credit risk, liquidity risk, market risk and operational risk are detailed below.

The Group Credit Risk Policy includes a list of excluded business activities that are considered to be incompatible with Group strategy due to, amongst other things, negative social impacts associated with animal welfare, healthcare/genetic engineering, adult entertainment and surveillance/arms-related/military. The policy rule prohibits providing new money for any lending facilities to businesses, or any of their subsidiaries, involved in the excluded business activities. This rule applies to all business customers with a Gross Connected Exposure of > €/£300k and who are relationship managed. Our policy was approved by our Board. The list of excluded activities is publicly available at ww.aib.ie/sustainability. The ESG Questionnaire is used in credit applications for borrowers identified as carrying increased climate and environmental, social and/or governance related risk where the new lending is over €/£/\$ 1 million. Work has continued on the ESG Questionnaire to further enhance and refine it, broadening the scope of coverage at both customer and sector level, whereby it is also used for annual reviews for Borrowers in high and moderate risk sectors with an exposure  $> \notin / £/\$10m$  and for material waiver requests for Borrowers in high risk sectors with an exposure  $> \notin / £/\$1m$ . In addition, ESG risk commentary is required in all credit applications for customers of our Capital Markets and Climate Capital segments.

AIB has focused on social outcomes beyond climate for social lending, as articulated in our Sustainable Lending Framework ("SLF"). The key themes included in social lending are:

• Access to healthcare (public and private)

- Affordable/social housing
- Education (public and private)
- Access to essential services and affordable infrastructure
- Access to finance for disadvantaged group

Cyber risk interacts with our material risks to varying degrees, and up to the end of 2024, we defined it as a sub-risk within our Operational Risk framework. From 1st January 2025, we have deemed Information Security (including Cyber) Risk to be a principal risk to the Group and no longer include it as a sub-risk of Operational Risk (please find more details in our Risk Management section of the AFR). This followed our review of the materiality of sub-risks within Operational Risk, as part of the MRA process. We considered a number of factors, including the impact on our capital, historical loss events in AIB, external loss events sourced from the Operational Risk data eXchange Association (ORX) network, Risk & Control Assessment (RCA), our assessment of emerging risks and consideration of the regulatory horizon.

As noted in the 'Financial effects' section above, in 2024, our overall cyber security spending was 10.33% of our total IT spending which is a subset of the Total Operating Expenses.

(iii) Funding and liquidity
The Green and Social Bond programmes support the AIB's Capital and Minimum Requirements for own
Funds and Eligible Liabilities ("MREL") issuance programmes - aligning our funding and liquidity plans
with the AIB's sustainability agenda and having a Debt Capital Markets offering for socially responsible investors. The Green and Social Bond Frameworks commit that an amount equal to the net proceeds from Green and Social Bond instruments issued by AIB will be used to finance and/or refinance a portfolio of eligible loans as defined by the eligibility criteria of each framework respectively. AIB review, challenge and, where required, update the composition of our pools, to align with evolving standards. Since 2020, AIB has issued six Green Bonds, totalling €4.65bn.

#### Market Risk

Interaction between social and market risk is managed via our Socially Responsible Investment Bond Framework. The purpose of our Socially Responsible Investment Bond Framework is to fund domestic and international projects aimed at global sustainability, carbon emission reduction, and social improvement, all under the over-arching themes of ESG. In order to ensure we maintain a strong presence in the sustainable bond market, and continue to fund positive impact projects, it is our continued ambition to grow the SRI Bond Portfolio to at least 14% of AIB's total Investment Securities in the medium-term. The SRI Bond portfolio reached €2.67bn and AIB's Investment Securities totalled €18.67bn which equates to 14.5% at year-end 2024.

#### Reputational Risk

Reputational Risk is pervasive across all risk types and its exposure is considered to be an outcome that arises in the event of any of the bank's material risks emerging across key business activities. AIB's Reputational Risk Framework, implemented in 2024, formalises and standardises the approach in identifying, assessing, measuring and managing business activity that elevates the Group's exposure to Reputational Risk. The Group's Materiality Matrix (GMM) is used to determine the materiality of the impact on individual risk types, which considers reputational and regulatory impacts, as well as financial losses and impact on business objectives

# 81: Table 3 - Qualitative information on Governance risk

As per Article 449a CRR, the following table describes the integration of governance risks in AIB Group's governance and risk

Row		Qualitative information
number		Governance
(a)	Institution's integration in their governance arrangements of the governance performance of the counterparty, including committees of the highest governance body, committees responsible for decisionmaking on economic, environmental, and social topics	Counterparty Management The Group continues to adapt its credit risk management processes and policies to monitor ESG risks. Sector specific rules and limitations are incorporated into credit policies within a defined climate-related and environmental risk appetite. The ESG Questionnaire continues to be used in credit applications for borrowers identified as carrying increased climate and environmental, social and/or governance related risk where the new lending is over €/£ 1 million. It is also used for annual reviews for Borrowers in high and moderate risk sectors with an exposure >€/£/\$10m and for material waiver requests for Borrowers in high risk sectors with an exposure >€/£/\$1m From a due diligence perspective, we have incorporated an improved ESG questionnaire into our risk assessment process, covering also the customer's understanding of ESG risks in their supply chains. This sector specific approach includes updates that are relevant to the governance performance of counterparties in higher risk sectors. The ESG Questionnaire initiates engagement with customers on ESG risks, including Governance, to instigate consideration of risk mitigation and transition to net zero.
		The Group Credit Risk Policy includes a list of excluded business activities that are considered to be incompatible with Group strategy due to, amongst other things, negative environmental impacts associated with deforestation, nuclear power generation, natural gas fracking and the exploration, extraction or refining of oil or coal. The policy rule prohibits providing new money for any lending facilities to businesses, or any of their subsidiaries, involved in the excluded business activities. The list of Excluded activities is a key negative screening tool used across the Group and prohibits lending >€300K to sectors recognised globally as being the highest carbon emitting sectors as well as various activities that are detrimental to ecosystems or animal welfare.
		ESG risk commentary is required in all credit applications for customers of our Capital Markets and Climate Capital segments. In addition, Group Credit Review provide reasonable and independent assurance on the management of credit risk, and its associated control environment, across the first and second lines of defence, on a risk prioritised basis.
		Responsible Supplier Code By implementing responsible and sustainable business practices across our own operations and supply chain, we seek to contribute to the wider environmental protection and social wellbeing. Our suppliers refer to any third-party organisation that provides goods or services to or on behalf of AIB Group. This definition does not include individual contractors, agents, or intermediaries. We employ a broad range of suppliers across multiple categories, with 4,003 active suppliers on our database, and we transacted with 2,528 of them in 2024. Active suppliers are all suppliers that have been paid within the last 12 months. The largest cohort of our suppliers are based in Ireland (66%). A further 26% are based in the UK, and the remaining 8% are in other locations, mostly other European countries, the USA and India. We segment our supplier base into five tiers, based on the risk and criticality of the service they provide. We then manage them accordingly, with the closest management accorded to Tier 1 suppliers who provide critical services to us, while Tier 5 suppliers typically provide low-value transactional goods and services. We use market intelligence, specific selection criteria and best-in-class selection tools to help us choose the most appropriate suppliers. Our due diligence reflects the nature, value, complexity, and criticality of the service we are procuring. For high-value/risk services, we perform specific due diligence checks on the supplier and their proposed service model. We subject lower-value and/or lower-risk suppliers to routine company financial and sanction scanning checks.
		Our Responsible Supplier Code sets out our expectations of our suppliers and the minimum standards they must meet regarding human rights, health and safety, supply chains, inclusion and diversity, and responsible and sustainable business. The Code uses the term 'Supplier' to refer to the suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with us, or who seek to do business with us as part of our upstream value chain. We will only do business with suppliers that adhere to our Code. We require evidence that they have an ESG plan or are working on putting one in place, and require all successful suppliers to join a Supplier Financial Qualification System, which provides a standardised process for collecting and managing their compliance and assurance information. We also encourage our suppliers to report their carbon emissions through the CDP. In 2024, the number of suppliers who participated in reporting to the CDP was 65, which represented 50% of the AIB suppliers invited. Our suppliers must adhere to all legal obligations in each jurisdiction in which they operate or provide services, as well as meeting any specific requirements in our own policies. Our key suppliers must attest annually that they have complied with our policies (or clauses in them that are relevant to our supply chain). These policies include our Code of Conduct, Conflicts of Interest Policy, Anti-Bribery & Corruption Policy, Data Protection Policy, Whistleblowing Policy and our Human Rights Commitment.
(b)	Institution's accounting of the counterparty's highest governance body's role in non- financial reporting	The general governance arrangements of counterparties are assessed by the Group through the mechanisms outlined in (a) in addition to standard credit reviews on an ongoing basis. At present, this does not include a detailed review of a counterparty's committee or functional position that formally reviews and approves the organisation's sustainability report and ensures that all material topics are covered. The Group will continue to monitor regulatory and industry developments and will improve processes as appropriate.

(c) Institution's integration in governance arrangements of the governance performance of their counterparties including (i) Ethical considerations (ii) Strategy and risk management (iii) Inclusiveness (iv) Transparency (v) Management of conflict of interest (vi) Internal communication on

critical concerns

Supplier Relationship Management (SRM) Standard.
Our SRM Standard encapsulates best practice SRM, which promotes mutually beneficial relationships, coupled with effective risk management, to deliver the following objectives:

- Identifying where to focus SRM resources to maximise the benefit for us.
   Introducing a consistent and systematic approach to SRM across AIB.
- 3. Encouraging cross-functional communication and knowledge sharing to drive productive supplier
- 4. Applying best-practice SRM techniques through practical approaches and relevant training for Accountable and Business Owners, such as recent training on their obligations under changing regulations.

In November 2024, we welcomed our top 100 suppliers to a Supplier Summit in Molesworth Street. The purpose of the Summit was to strengthen collaboration, align our suppliers with our purpose, and reinforce their critical role in helping us achieve our strategic goals across Customer First, Greening the Business and Operational Efficiency.

We inform suppliers of our Responsible Supplier Code at onboarding and at each transaction via Purchase Order communications. The Code is also an agenda item during Annual Strategic Reviews and is documented through meeting minutes. This reinforces the Code's message and ensures that the supplier is aligned. In addition to meeting the requirements of our Code, we expect our suppliers to maintain similar levels of compliance throughout their own value chain, including any suppliers or approved subcontractors that they work with to supply goods and services to us. These principles form part of our supplier selection process and we continuously monitor them. We require our Accountable Owners and Business Owners to be familiar with the Code. Business Owners represent us when dealing with the supplier, while Accountable Owners line-manage the Business Owner and control or authorise the budget. We expect suppliers to take appropriate measures to secure and protect all confidential information related to their relationship with us, and to use it only for the purpose authorised under our contractual agreement with them

Third Party Management Process; ESG Questionnaire

ESG factors are increasingly important for our own performance, and for our relationships with suppliers. The ESG Questionnaire covers a broad range of ESG areas, and requires responses and evidence from suppliers on their:

• journey to establishing or achieving their Net Zero targets;

- annual sustainability reports;
- Scope 1,2 and 3 GHG emissions;
- consideration of physical risks from climate change;
   policies on discrimination, inclusion & diversity, health & safety, modern slavery, vulnerable persons, greenwashing, and speaking up;
- Code of Conduct and their Responsible Supplier Code for their own supply chain; and
- commitment to ongoing ESG-related training in their organisation.

By engaging with our suppliers through the ESG questionnaire during the selection process, we benefit in the following ways: 1. Aligning Our Values and Expectations Asking suppliers to complete an ESG Questionnaire communicates our ESG standards and expectations to them, and ensures that we work with partners that share our values. This can help to build trust and reputation, and avoid potential conflicts or controversies.

- 2. Identifying Risks and Opportunities The Questionnaire helps us to assess the ESG performance and risks of our suppliers and their supply chains, such as their environmental impact, social responsibility, human rights, labour practices, ethics, and governance. This helps us to identify and mitigate ESG risks, such as regulatory fines, reputational damage, operational disruptions, or legal liabilities. It also helps us to identify and leverage ESG opportunities, such as innovation, cost savings, customer loyalty, or market differentiation.
- 3. Providing a Baseline and a Roadmap The questionnaire provides a baseline for measuring and monitoring suppliers' ESG performance and progress, as well as a roadmap for improvement. By using a standardised ESG Questionnaire, we can benchmark and compare our suppliers, and track their ESG performance over time. It also allows us to provide feedback and guidance to our suppliers and encourages them to adopt best practices and achieve continuous improvement. Suppliers Portal Our Suppliers Portal creates transparency by providing information on how to become a supplier. It includes our policies, procedures, and our standard terms of purchase, which explains our payment terms for suppliers.

There are specific criterion of the counterparty assessed in the ESG Questionnaire to clients in highrisk climate sectors including ethical considerations, health and safety, inclusiveness, transparency etc. The output of the ESG Questionnaire, an ESG Commentary and the counterparty's strategy/risk management is included in the Credit paper to determine credit approval at the Group Credit Committee. The Credit Committee was established by and is accountable to the Group Risk Committee to perform the functions set out in its Terms of Reference.

- Credit / Counterparty: ESG Questionnaire
  (i) Sector specific ESG Questionnaires have been established covering a wide variety of sectors including Agriculture
- Food Manufacturing
- Non-Renewable Energy
- (iv) Transport
- Healthcare
- Retail & Wholesale, Hotels & Leisure
- Commercial Real Estate (vii)
- (viii) Land & Development Finance
- Renewable Energy (ix)
- Manufacturing (x)

Questions address each of the environmental, social and governance risk factors. Sector specific factors are considered in each questionnaire where relevant.

Topics addressed as part of the environmental risk section of the questionnaire include sector water, waste and pollution management, sustainability certifications, biodiversity impact, GHG emissions, the presence of emission targets and carbon transition plans.

Topics addressed as part of the social risk section of the questionnaire include health & safety, forced labour, workforce and respect for human rights.

Topics addressed as part of the governance risk section of the questionnaire include business ethics, ESG governance practices, supply chain management, reporting and third party verifications

(d) Institution's integration in risk management arrangements the governance performance of their . counternarties considering: (i) Ethical considerations (ii) Strategy and risk management (iii) Inclusiveness (iv) Transparency (v) Management of conflict of interest (vi) Internal communication on

critical concerns

### Risk management

Credit / Counterparty: ESG Questionnaire

The ESG Questionnaire rating and summary assessment is included in credit applications and is subject to 2LOD review and challenge. In circumstances where the ESG Questionnaire rating is high, it is a requirement of credit policies that this is adequately mitigated in the credit application.

Third Party Management (TPM) Process: ESG Questionnaire

Our TPM Framework, Policy and Standards require the completion of both a Service and Risk Assessment when onboarding new Third Party Providers (TPPs). For existing AIB TPPs, a Risk Assessment must be re-performed on a regular basis to ensure up to date due diligence is completed and maintained. The ESG questionnaire forms part of the Risk Assessment which when completed is reviewed and scored by the relevant SME's. This combined outcome of the service and risk assessment of the supplier determines whether they meet AIBs standards and if so, the level of time and resource invested in the management and oversight of the relationship is commensurate with the level of regulatory, commercial, and operational risk associated with the arrangement.

#### Other policies and frameworks

In addition to the ESG questionnaire referenced in (c) above AIB implements an anti-money laundering ("AML") and counter terrorist financing ("CTF") program that includes the following principles in all the jurisdictions in which AIB operates:

- written policies and procedures
- the appointment of a designated Money Laundering Reporting Officer ("MLRO")
- establishing the purpose of business relationships completing appropriate customer due diligence ("CDD") measures on customers and beneficial owners
- undertaking ongoing monitoring of customer relationships applying enhanced due diligence measures in relation to customers presenting a higher risk, including politically exposed persons ("PEPs")
- reporting to the relevant authority where there are reasonable grounds to suspect that a money laundering or terrorist financing offence has been, or is being, committed and co-operate with the authority
- retention of relevant records
- regular staff training
- prohibition on anonymous accounts and conducting business with 'shell' banks (as defined within the FATF 40 recommendations)

In our ongoing efforts to safeguard the integrity of our financial systems, we have established a series of proactive measures to prevent and mitigate financial crime and ensure the effective implementation of our Financial Crime and Conflict of Interest policies. The Group will continue to monitor regulatory and industry developments and will improve processes as appropriate.

#### 82: Template 1 - Banking book - Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

As per Article 449a CRR, the following template provides information on exposures to sectors that are more prone to the risks that institutions may face from the transition to a low-carbon and climate resilient economy. No material changes since June 2024. Lending to exposures in sectors contributing to climate change are subject to AIB policies and frameworks.

Exclusions from EU Paris- aligned benchmarks (column (b)):

In order to identify counterparties that are excluded from the EU Paris-aligned Benchmarks as specified in Article 12(1), points (d) to (g), the Group completed a review of the portfolio in line with the relevant revenue and emissions thresholds. As of publication of this disclosure, no significant testing against the Do No Significant Harm (DNSH) criteria has occurred and, as a result, Article 12(2) of Commission Delegated Regulation (EU) 2020/1818 exclusion criteria has not been taken into account during the counterparty identification process. The percentage of lending to non-financial corporates excluded from Paris-aligned benchmarks on this basis is <1% which is consistent with disclosure as at 31 December 2024.

- GHG financed emissions scope 1,2 and 3 (columns (i)-(k)):

   AIB's approach continues to evolve in line with industry developments and numbers may change with time. Reported GHG emissions are calculated on the economic activity of the borrower based on a third party emissions provider data. The sources used are as follows:

   Three-year rolling mean Teagasc emissions data assumed for both Agri Dairy and Beef (source: Teagasc Sustainability Report 2023 published Oct 24).

   ICE (Source date: December 2022) for all other cases, except Electricity Generation (Power) where the basis of compilation utilises power output projections and associated emissions based on individual counterparty data.

ſ																	
	Sector/subsector	a	b Gross carry	c ring amour	d ut (Min EUR)	e e	accumula fair valu		e changes in dit risk and	emission scope 2 a emissio counter tons	inanced s (scope 1, nd scope 3 ns of the party) (in of CO <sub>2</sub> valent)	k GHG	I	m	n	0	p
			Of which exposures towards companies excluded from EU Parisaligned Benchmark s in accordance with Article 12(1) points (d) to (g) and in accordance with Article 12(2) of Regulation (EU) 2020/1818	le (CCM)	stage 2 exposures	Of which non- performing exposures		Of which Stage 2 exposures	Of which non- performing exposures		Of which Scope 3 financed emissions	emission s (column i): gross carrying amount percenta ge of the portfolio derived from company -specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
1	Exposures towards sectors that highly contribute to climate change <sup>1</sup>	19,504	166	-	3,231	701	(618)			3,878,762	3,214,366	17.75 %	14,381	2,977	1,995	151	4
2	A - Agriculture, forestry and fishing	704	_	_	137	44	(18)	(6)	(11)	331,059	143,286	- %	353	157	194	0	6
3	B - Mining and quarrying	57	1	-	7	1	(1)	(0)	(1)	36,357	27,187	- %	47	9	0	0	3
4	B.05 - Mining of coal and lignite	-	-	_	-	_	_	-	_	_	_	- %	_	-	-	-	-
5	B.06 - Extraction of crude petroleum and natural gas	25	1	-	0	0	(0)		-	28,324	23,529	- %	25	ı	ı	ı	3
6	B.07 - Mining of metal ores	-	_	_	_	_	_	_	_	_	_	- %	_	_	ı		_
7	B.08 - Other mining and quarrying	32	1	_	7	1	(1)	(0)	(1)	8,033	3,659	- %	23	9	_	_	3
8	B.09 - Mining support service activities	-	-	_	-	-	-	-	_	-	_	- %	-	-	-	-	-
9	C - Manufacturing	3,059	0	-	383	41	(58)	(32)	(19)	1,460,176	1,275,395	- %	2,527	491	42	-	3
10	C.10 - Manufacture of food products	1,044	_	-	111	2	(20)	(16)	(1)	535,725	471,221	- %	896	127	21	-	2
11	C.11 - Manufacture of beverages	188	-	-	24	3	(3)	(2)	(1)	28,759	25,321	- %	115	72	1	1	4
12	C.12 - Manufacture of tobacco products	0	-	-	-	-	0	-	-	0	0	- %	0	_	-	-	-
13	C.13 - Manufacture of textiles	4	_	-	2	1	(0)	(0)	(0)	1,349	834	- %	3	1	0	-	3
14	C.14 - Manufacture of wearing apparel	-	_	-	-	_	_	-	-	-	-	- %	_	-	-	-	-
15	C.15 - Manufacture of leather and related products	-	-	_	_	-	-	_	-	_	-	- %	_	-	-		_
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	42	_	_	25	0	(2)	(2)	(0)	11,854	10,439	<b>-</b> %	36	5	0	-	3
17	C.17 - Manufacture of paper and paper products	55	-	_	19	4	(5)			22,793	15,022	- %	53	1	1	_	2
18	C.18 - Printing and reproduction of recorded media	20	_	_	4	3	(1)	(0)			5,671	- %	6	13	1	-	5
19	C.19 - Manufacture of coke and refined petroleum products	8	0	_	_	8	(-)	_	(-)	43,754	41,094	- %	8	_	-	_	1
20	C.20 - Manufacture of chemicals and chemical products	213	-	_	45	0	(3)				224,042	- %	204	9	0	_	2
21	C.21 - Manufacture of basic pharmaceutical products and pharmaceutical preparations	273	_	_	1	1	(1)	(-)	(0)	60,285	45,684	- %	273	1	-	_	3
22	C.22 - Manufacture of rubber products	_	_	_	_	_	_	_	_	_	_	- %	_	_	_	_	_

							()	(-1					1				
23	C.23 - Manufacture of other non-metallic mineral products	226	_	_	1	0	(1)	(0)	(0)	106,521	94,041	- %	169	56	1	-	3
24	C.24 - Manufacture of basic metals	_	-	-	_	-	-	-	-	-	-	- %	-	-	-	-	_
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	4	-	-	1	_	(0)	(0)	(0)	3,814	3,386	<b>–</b> %	4	1	_	-	2
26	C.26 - Manufacture of computer, electronic and optical products	332	_	-	5	0	(2)	(1)	(0)	47,162	39,259	- %	202	125	5	-	4
27	C.27 - Manufacture of electrical equipment	_	-	-	-	-	-	-	-	-	_	- %	-	_	_	-	-
28	C.28 - Manufacture of machinery and equipment n.e.c.	192	ı	-	44	8	(5)	(2)	(2)	177,547	174,958	- %	168	22	3	-	3
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers		I	_	-	_	-	_	_	_		— %	_	-		_	_
30	C.30 - Manufacture of other transport equipment	-	-	-	-	_	-	_	_	_	_	- %	_	_	_	_	_
31	C.31 - Manufacture of furniture	_	ı	_	-	-	-	-	-	_	_	- %	-	_	_	-	_
32	C.32 - Other manufacturing	458	ı	_	102	11	(15)	(5)	(9)	140,707	124,423	- %	390	58	10	_	2
33	C.33 - Repair and installation of machinery and equipment	-	-	_	-	-	-	_	_	-	1	- %	_	1	1	_	-
34	D - Electricity, gas, steam and air conditioning supply	4,861	157	-	209	3	(24)	(9)	(0)		97,242	71.23 %	2,192	948	1,571	151	8
35	D35.1 - Electric power generation, transmission and distribution	4,600	31	-	209	0	(23)	(9)	(0)	39,560	28,409	73.37 %	1,962	917	1,571	151	8
36	D35.11 - Production of electricity	4,246	1	-	202	-	(22)	(9)	-	30,131	20,340	79.46 %	1,822	756	1,518	150	8
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	261	126	_	-	3	(1)	(—)	(-)	77,772	68,833	33.51 %	230	31	-	_	3
38	D35.3 - Steam and air conditioning supply	-	-	-	-	-	-	-	-	-	-	- %	-	-	1	-	_
39	E - Water supply; sewerage, waste management and remediation activities	260	-	-	25	4	(6)	(4)	(1)	88,167	30,722	- %	260	0	-	-	2
40	F - Construction F.41 - Construction of	1,084 977	_	_	170 147	55 51	(65) (61)	(8) (7)	(21) (19)	126,487 96,423	118,317 89,946	- % - %	1,043 959	37 17	4	-	2
41	buildings			_												_	1
42	F.42 - Civil engineering F.43 - Specialised	71 36		_	15 8	3	(3)	(1)	(1)	18,006 12,058	16,587 11,784	- % - %	59 25	11 10	1	_	3
44	construction activities  G - Wholesale and retail trade; repair of motor vehicles and	1,859	8	-	287	55	(53)	(28)	(19)	1,385,264	1,346,340	- %	1,391	390	78	-	3
45	motorcycles H - Transportation and storage	1,645	0	-	140	72	(70)	(6)	(58)	269,185	114,362	- %	1,186	401	58	-	3
46	H.49 - Land transport and transport via pipelines	453	0	-	31	2	(4)	(1)	(1)	67,137	45,711	- %	211	191	51	-	5
47	H.50 - Water transport	372	_	-	56	67	(59)	(1)	(56)		24,750	- %	243	128	1	-	3
48	H.51 - Air transport H.52 - Warehousing	154 658	_	_	1 51	0	(1)	(—) (3)	(0)	64,090 36,498	13,385 30,309	- % - %	130 599	25 54	_ 5	_	3 2
49	and support activities for transportation																
50	H.53 - Postal and courier activities	7	ı	-	1	1	(0)	(0)	(0)	433	206	- %	3	4	0	-	5
51	I - Accommodation and food service activities	2,385	-	-	357	90	(65)	(25)	(22)	305,957	251,488	<b>–</b> %	1,847	406	132	-	4
52	L - Real estate activities	5,974		-	1,871	425	(321)	(160)	(141)	64,734	61,514	- %	5,382	543	49	0	2
53	Exposures towards sectors other than those that highly contribute to climate change <sup>1</sup>	14,377	0	18	1,897	187	(252)	(141)	(56)				9,477	2,961	1,754	185	5
54	K - Financial and insurance activities	6,554	1	_	753	11	(76)	(58)	(10)				4,021	1,065	1,327	140	5
55	Exposures to other sectors (NACE codes J, M - U)	5,438	0	18	787	86	(111)	(58)	(24)	4.40.	2.455.055	40.22.51	3,609	1,490	295	44	4
56	TOTAL	33,881	166	18	5,128	888	(870)	(394)	(326)	4,184,/19	3,465,853	10.22 %	23,857	5,938	3,750	336	4

<sup>1</sup>In accordance with the Commission Delegated Regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks-Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006. Additionally, sector I is not part of the Sectors that highly contribute to Climate Change, as specified in Recital 6 of the Commission Delegated Regulation (EU) 2020/1818.

### 83: Template 2 - Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

As per Article 449a CRR, this template shows the gross carrying amount, as referred to in Part 1 of Annex V to Implementing Regulation (EU) 2021/451, of loans collateralised with commercial and residential immovable property and of repossessed real estate collaterals, including information on the level of energy efficiency of the collaterals measured in terms of kWh/m2 energy consumption (columns (b) to (g) of the template), in terms of the label of the energy performance certificate (EPC) of the collateral as referred to in Article 2, point (12), of Directive 2010/31/EU for Member States, or as defined in any relevant local regulation for those exposures outside the Union, where a mapping to the Union EPC label exists (columns (h) to (n)).

Energy efficiency (column (b)-(g)):

Energy efficiency (column (b)-(g)):

Energy efficiency has been derived from EPC labels where available. Where an EPC label was not available the energy efficiency rating of the collateral has been estimated using data variables including year of construction, dwelling type and small area location e.g. neighbourhood to a high level of precision. Our approach continues to evolve in line with industry developments and numbers may change with time. There have been no material changes to output in comparison to 30 June 2024 disclosure.

EPC label of collateral (column (h)-(n)):

• The Group has used the latest EPC label available for collateral.

		а	b	С	d	е	f	g	h	i	j	k	ı	m	n	0	р
	Counterparty sector								oss carr	ying am	ount (in	MEUR)					
			Level	of energy	efficienc colla		e in kWh	/m² of	Leve	l of ene	gy effici	ency (EF	PC label	of collat	eral)		EPC label of lateral
			0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	А	В	С	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
1	Total EU area	43,630	10,221	14,924	9,821	2,141	1,757	3,571	6,612	3,188	2,186	1,004	585	209	217	29,628	95.97 %
2	Of which Loans collateralised by commercial immovable property	7,081	429	331	95	327	1,390	3,317	612	147	173	73	58	1	4	6,014	80.16 %
3	Of which Loans collateralised by residential immovable property	36,547	9,793	14,594	9,726	1,814	367	253	6,000	3,041	2,013	931	527	208	213	23,612	100.00 %
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	2	-	_	1	_	_	_	1	1		1		_	_	2	- %
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	28,433	3,365	10,626	8,152	1,574	1,483	3,232								28,433	100.00 %
6	Total non-EU area	3,889	699	599	1,225	514	210	472	345	699	489	402	192	50	11	1,702	90.04 %
7	Of which Loans collateralised by commercial immovable property	2,200	330	179	489	407	189	465	334	399	245	179	69	7	5	963	82.38 %
8	Of which Loans collateralised by residential immovable property	1,688	369	420	735	107	21	7	11	300	244	223	123	43	6	739	100.00 %
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties		_	_	_	_	_	_	_				_	_	_	_	_
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	1,532	40	117	736	162	114	362								1,532	100.00 %

### 84: Template 3 - Banking book - Indicators of potential climate change transition risk: Alignment metrics

As per Article 449a CRR, this template provides information on the Groups alignment efforts with the objectives of the Paris Agreement for a selected number of sectors. The disclosures on the alignment capture the extent to which financial flows are consistent with a pathway towards low greenhouse gas emissions and climate-resilient development as referred to in the Paris Agreement. The economic scenario that describes that decarbonisation pathway is the international Energy Agency (IEA) Net Zero Emissions by 2050 Scenario (NZE2050) and the Group have taken into account that scenario. Given that the IEA provides scenarios at global level and some specific metrics at European level, AIB measure the distance from the IEA scenario benchmarks at global level and, where the specific European level metrics are available, at European level.

The Electricity Generation portfolio (Power sector) is primarily comprised of renewable energy assets and is therefore starting at a low level of intensity of emissions. The Group commits to maintain the emissions intensity of its electricity generation project finance portfolio at or below 21 gCO<sub>2</sub>e/kWh from 2021 through 2030. The basis of compilation utilises power output projections and associated emissions based on individual counterparty data gathered as part of the project finance credit assessment process. Since the maintenance target was validated by the Science Based Targets Initiative (SBTi), Waste to Energy counterparties have been de-scoped as per SBTi guidance. The reason for this exclusion is that Waste to Energy facilities are not based on fossil fuels and electricity generation is not their main purpose and revenue generator. The financed emissions related to waste to energy will continue to be tracked against our maintenance target internally.

The Group's approach is to disclose portfolio alignment only for relevant sectors where AIB has existing Finance Emissions Targets in place. This results in disclosure for the Power sector only, which is based on AIB's SBTi validated targets for Electricity Generation. Except for Power, no targets are set for the other sectors due to immateriality of exposures.

	a	b	С	d	e	f	g
	Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric	Year of reference	Distance to IEA NZE2050 in % <sup>1</sup>	Target (year of reference + 3 years)
1	Power	D35	3,463	21 gCO₂e/kWh	2024	(86.53)%	21 gCO₂e/kWh
2	Fossil fuel combustion						
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production						
	Iron and steel, coke, and metal ore production						
8	Chemicals						
9	potential additions relavant to the business model of the institution						

<sup>&</sup>lt;sup>1</sup>Point in Time (PiT) distance to 2030 NZE2050 scenario in % (for each metric)

# 85: Template 4 - Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms

As per Article 449a CRR, this template provides aggregated and anonymised information on exposures (including banking book loans and advances, debt securities and equity instruments) towards the top 20 carbon-intensive companies in the world.

The Group used a number of data sources to investigate whether the Bank has any exposure to a top 20 carbon-intensive firm. Data sources used to confirm the list of top 20 carbon-intensive firms include; Carbon Disclosure Project (CDP), the Climate Accountability Institute Top 20 CO2 emissions table, S&P, Bloomberg and Refinitiv datasets.

The Group determined that it has no direct exposure to any top 20 carbon-intensive firm as at 31st December 2024. An exposure of less than €0.1m to a standalone joint venture to which one of the top 20 carbon-intensive firms is party to for the purposes of a non-Paris aligned benchmark activity was identified.

	а	b	С	d	е
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate) <sup>1</sup>	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	_	_	_	_	-

<sup>&</sup>lt;sup>1</sup>For counterparties among the top 20 carbon-intensive companies in the world.

#### 86: Template 5 - Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk

As per Article 449a CRR, this template provides information on exposures in the banking book, including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale, towards Non-Financial Corporates and Retail Residential Mortgages, on loans collateralised with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards. The Group have completed this template on a best efforts basis in line with Regulation (EU) 2022/2453.

The Group has exposures secured on Commercial immovable property of €7.2bn as at 31 December 2024, of which €0.18bn (2.6%) is sensitive to Physical Flood Risk. Template 5 was expanded to include Retail Residential Mortgages for the first time at 31 December 2024. The Group has exposures secured on Residential immovable property of €37.8bn as at 31 December 2024, of which €0.38bn (1.0%) is sensitive to Physical Flood Risk.

The gross carrying amount in column (b) is as defined in Part 1 of Annex V to Commission Implementing Regulation (EU) 2021/451 of those exposures towards non-financial corporates and Retail Residential Mortgages (including loans and advances, debt securities and equity instruments), classified under the accounting portfolios in the banking book according to that Regulation, excluding financial assets held for trading and held for sale assets. In addition, rows 10-12 of the template are not "of which" categories of rows 1-9 and should be viewed as standalone line items as per the guidance. For completeness, row 13 contains all other loans and advances, debt securities or equity instruments (including loans that are collateralised by immovable property and repossessed real estate collaterals) in non-financial corporates that have not been captured in the NACE codes across rows 1-9. All geographic areas in which AIB has exposures are covered by the template with material lending located in Ireland and United Kingdom.

In order to identify the appropriate climate change physical risk events for consideration in this disclosure, the Group were informed by internal climate risk heat maps. On that basis, it was determined that the portfolio was most sensitive to river and surface water flooding (acute) and coastal flooding (chronic). Other physical risks such as landslides, tsunamis, wildfires and extreme heat were identified as low risk for the portfolio and therefore discounted in the analysis.

The Group analysed sensitivity to impact from climate change physical risk (i.e. flood events) by reviewing JBA flood hazard location data, at return period 1-in-100yr under Representative Concentration Pathway (RCP) 8.5 climate scenario for year period 2031-2035. As required by the regulatory guidance, column h shows the gross carrying amount of exposures sensitive to impact from horinc risk only, column i shows the gross carrying amount of only the exposures sensitive to impact from both chronic and acute physical risk. As such the columns (h)-(j) are mutually exclusive and the sum of these rows shows the total gross carrying amount of exposures sensitive to impact from climate change physical risk.

Improved methodology due to a newly available internal flood data model at asset level allows for sensitivity to flood risk to be allocated at an Eircode level for columns (c)-(g) and (k)-(o). Consequently, the output for columns (c)-(g) and (k)-(o) is no longer applied on a pro-rata basis.

Group exposures unsecured by collateral have not been included in the "of which sensitive to risk" section of the disclosure template (columns (c)-(o)) given the lack of suitable data available to determine whether an unsecured exposure would be impacted by climate change physical risk. The Group will continue to monitor availability of relevant data via industry forums and engagement with third party data providers on an ongoing basis for future reporting periods.

	a	b	С	d	е	f	, a	h			k	1	m	n	0
	d	Ü	ι	u	е	ı ı	g		rying amount	(Min FUR)	K	ı ı	- ""	"	0
						of whi	ch exposur			climate char	ge physical e	events			
				Breakdow	n by maturi			of which exposures sensitive to impact from	of which exposures sensitive to impact from acute	of which exposures sensitive to impact both from chronic and	Of which Stage 2	Of which non-performing	accumu in fair v	nulated imp lated negati alue due to and provisio	ve changes credit risk
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity	chronic climate change events	climate change events	acute climate change events	exposures	exposures		of which Stage 2 exposures	Of which non- performing exposures
1	A - Agriculture, forestry and fishing	704	0	0	0	0	0	0	0	0	0	0	0	0	0
2	B - Mining and quarrying	57	0	0	0	_	0	0	0	0	0	0	0	0	0
3	C - Manufacturing	3,059	0	2	0	_	7	0	2	0	1	0	0	0	0
4	D - Electricity, gas, steam and air conditioning supply	4,861	0	0	0	0	1	0	0	0	0	0	0	0	0
5	E - Water supply; sewerage, waste management and remediation activities	260	0	0			0	0	0	0	0	0	0	0	0
6	F - Construction	1,084	1	0	0	_	0	0	1	0	0	0	0	0	0
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,859	0	3	0	_	8	0	3	1	2	0	0	0	0
8	H - Transportation and storage	1,645	0	0	0	_	8	0	0	0	0	0	0	0	0
9	L - Real estate activities	5,974	115	1	0	0	1	30	61	25	89	0	(7)	(7)	0
10	Loans collateralised by residential immovable property	37,846	26	54	143	155	17	97	171	109	26	15	(5)	(1)	(4)
11	Loans collateralised by commercial immovable property	7,181	171	10	7	0	3	32	113	44	95	3	(8)	(7)	_
12	Repossessed collaterals	2	1	_	_	_	_	_	_	_	_	_	_	1	_
13	Other relevant sectors ( breakdown below where relevant)	50,746	81	57	149	155	15	99	217	127	30	18	(6)	(1)	(4)
	I - Accommodation and food service activities	2,385	58	1	7	_	5	4	44	18	4	0	(1)	0	0
	J - Information and communication	1,463	_	_	_	_	_	_	_	_	_	_	_	_	_
	K - Financial and insurance activities	6,554	_	_	_	_	_	_	_	_	_	_	_	_	_
	M - Professional, scientific and technical activities	763	0	0	_	_	4	0	0	0	0	0	0	0	0
	N - Administrative and support service activities	527	0	_	_	_	0	0	_	_	_	0	0	_	0
	P - Education	162	_	3	_	_	9	_	3	_	_	3	0	_	0
	Q - Human health and social work activities	1,328	_	_	_	_	_	_	_	_	_	_	_	_	_
	R - Arts, entertainment and recreation	417	_	_	_	_	_	_	_	_	_	_	_	_	_
	S - Other services	778	0	0	_	_	5	0	0	0	0	_	0	0	_
	T - Activities of households as employers; undifferentiated goods- and services- producing activities of households for own use	36,369	22	54	143	155	17	95	170	109	25	15	(5)	(1)	(4)

# 87: Template 6 - Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures

As per Article 449a CRR, this template provides an overview of the KPIs calculated on the basis of templates 7 and 8, including the green asset ratio (GAR) as referred to in Commission Delegated Regulation (EU) 2021/2178. As required, this template discloses the GAR once, based on the turnover alignment of the counterparty for the general purpose lending part only. Note: December 2023 GAR has been restated from 5.9% to 4.4%.

		КРІ		% coverage (over total assets) <sup>1</sup>
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR Stock	4.27 %	<b>–</b> %	4.27 %	44.32 %
<b>GAR Flow</b>	2.07 %	<b>-</b> %	2.07 %	38.88 %

 $<sup>^1\!\%</sup>$  of assets covered by the KPI over banks' total assets

As per Article 449a CRR, this template provides information on gross carrying amount of institutions' loans and advances, debt securities and equity instruments on their banking book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real extate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regard to the environmental objectives of climate change mitigation and climate change adaptation as referred to in Article 9, points (a) and (b). of Regulation (E). Or Regulation (E). Or Regulation (E). Or Regulation (E).

The criteria for Utaxonomy is trict with many lending activities that contribute to the transition of a greener economy excluded as the activities do not meet this criteria. For AIB, EU Taxonomy aligned exposure identified materially comprises 1] lending to residential mortgages where the underlying assets meet the technical screening criteria for Climate Change Mitigation including an assessment of DNSH to Climate Change Adaptation and to a much less extent 2) lending to counterparties subject to the Non-Financial Reporting Directive (representing a small portion of total lending activity: c158, 10 material movements risce June 2024.

In determining alignment for residential mortgages we have utilised the Building Energy Rating (BER) or Energy Performance Certificate (EPC) of the property to identify assets contained in the Top 15% of national stock (constructed pre 2020) or aligned to the Nearly Zero Energy Building Standard - 10% (constructed post 2020). As in previous years, a screening exercise was performed to identify counterparties subject to the Non-Financial Reporting Directive and reporting for this cohort has been undertaken using 2024 published data by counterparties white relative to 2023 year end information. The EU Taxonomy regulation is a subject to organ publishes and reformance the includition of the CRA over time.

$\Box$		a	b	С	d	е	f	g	h	i	j	k	ı	m	n	0	р
							E	isclosure re	ference date	31/12/2024							
				Climate Chang	e Mitigation (CC	CM)				Change Adap				Total	(CCM + CCA)		
			Of which tow	ards taxonomy re	elevant sectors (	Taxonomy-el	ligible)	Of which	towards tax	onomy relev eligible)	ant sectors (T	axonomy-	Of which tow	ards taxonomy	relevant sectors	(Taxonomy-	eligible)
	Million EUR	Total gross carrying		Of which envi	ronmentally sus	tainable (Tax	onomy-		Of which en	vironmentall		(Taxonomy-		Of which env	ironmentally su	stainable (Ta	xonomy-
		amount			aligned)						ned)				aligned		
						Of which transitional	Of which enabling			Of which specialised	Of which adaption	Of which enabling			Of which specialised	Of which transitional	Of which enabling
L					lending	transitional	CHOOMING			lending	dauption	Chidoling			lending	/adaption	Citabiling
		ts in both numerator and	d denominator														
1	Loans and advances, debt securities and equity	63,206	39,280	4,150	4,132	_	18	6	_	_	_	_	39,287	4,150	4,132	_	18
-	instruments not HfT eligible for GAR calculation		***	,,_,,	,,									,,	,,,,,,,		
2	Financial corporations	19,953	_	-	-	-	_	-	_	-	-	_	_	_	-	-	_
4	Credit institutions  Loans and advances	13,399 5,928				-	_	_		_	_					-	_
5	Debt securities, including	7,471	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_
6	UoP Equity instruments	<u> </u>	_	_		_	_	_	_		_	_	_			_	_
7	Other financial	6,554	_	_	_	-	_	_	-	_	-	_	_	-	_	-	_
8	corporations of which investment	370	_	_	_	_	_	_	_	_	_	_	_		_	_	_
9	firms Loans and advances	370	_		_	_		_	_	_	_				_	_	_
10	Debt securities, including	370	_			_		_			_				<del>-</del>		_
11	UoP					<u> </u>	_	_								<u> </u>	_
12	of which management		_		_	_	_	_		_	_	_	_			_	_
13	companies	0			_	_	_	_	_	_	_	_	_			_	_
14	Debt securities, including	_				_	_	_		_	_					_	_
15	UoP	_	_	_		_	_	_	_		_	_				_	_
16	of which insurance	25	_	_	_	-	_	_	_	_	_	_	_	_	_	_	_
17	undertakings Loans and advances	25	_	_	_	_	_	_	_	_	_	_	_		_	_	_
18	Debt securities, including UoP	-	_	_	_	-	-	_	-	_	-	_	_	_	_	-	_
19		-	_	_		-	_	_	_		-	_	_			-	-
П	Non-financial corporations																
20	(subject to NFRD disclosure obligations)	882	200	18	_	0	18	6	_	_	_	_	206	18	_	-	18
21	Loans and advances	882	200	18	-	0	18	6	-	-	-	_	206	18	-	-	18
22	Debt securities, including UoP	-	-	-	-	-	_	-	-	-	-	-	-	_	-	-	-
23	Equity instruments Households	42,342	39,080	4,132	4,132			_			_	_	39,080	4,132	4,132	-	_
24	of which loans	42,342	39,000	4,132	4,132	_	_						39,080	4,132	4,132	_	_
25	collateralised by residential immovable	36,369	36,331	4,132	4,132	-	_						36,331	4,132	4,132	-	-
H	property of which building																
26	renovation loans of which motor vehicle	4	4	_	-	_	_						4		_	_	-
27	loans	827	827	-	-	-	-						827	-	-	-	-
28	Local governments financing	30	-	-	-	-	-	-	-	_	-	-	-	-	-	-	_
29	Housing financing	-	-	_	-	-	_	-	_	_	-	_	_	_	-	-	_
30	Other local governments financing	30	-	-	-	-	-	-	-	-	-	-	-	-	-	-	_
	Collateral obtained by taking possession:		_			_		_				-					
31	residential and commercial immovable properties	2	_	_	_	-	_	-	_	-	_	_	_	_	_	-	_
32	TOTAL GAR ASSETS	63,208	39,280	4,150	4,132	_	18	6	_	_	_	_	39,287	4,150	4,132	_	18
	Assets excluded from in the denominator	m the numerator for GA )	R calculation (cove	ered													
П	EU Non-financial corporations (not subject																
33	to NFRD disclosure	15,178															
34	obligations  Loans and advances	14,537															
35	Debt securities	640															
36	Equity instruments Non-EU Non-financial	1															
37	corporations (not subject	11,267															
	to NFRD disclosure obligations)																
38	Loans and advances	11,034															
39 40	Debt securities Equity instruments	232															
41	Derivatives	1,719															
42	On demand interbank loans	401															
43		664															
44		4,762															
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	97,199															
	Other assets exclude	ed from both the numer	ator and denomin	ator													
46	for GAR calculation	7,945															
47	Central banks exposure	7,945 36,904															
48		561															
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND	45,410															
	DENOMINATOR TOTAL ASSETS																
(50	IUIAL ASSEIS	142,608															

#### 89: Template 8 - GAR (%)

As per Article 449a CRR, this template uses the information included in template 7 to disclose the GAR as referred to in Delegated Regulation (EU) 2021/2178. As required, this template discloses the GAR once, based on the turnover alignment of the counterparty for the general purpose lending part only. No material movement since June 2024.

		a	b	c	d	e	f	8	h		j.	k	- 1	m	n	0	Р	q	r	s	t	u	v	w	×	У	z	23	ab	ac	ad	96	af
							Disclos	sure ref	erence date	31/12/2024	: KPIs on s	tock											Disclosu	re refer	ence date 3	1/12/2024	: KPIs on fl	ows					
		d	mate Ch	ange Mitiga	tion (CCM)			Climat	te Change A	daption (CC	A)			TOTAL (	CCM + CCA	)		ci	limate Cha	ange Mitig	ation (CCI	A)		Climate	Change Ad	aption (CC	A)		T	OTAL (CC	M + CCA)		
		Proportion o				relevant	Propo			ts funding t		Proport		ble assets evant sect	funding ta	xonomy			ortion of r	new eligible	e assets fu			ortion o	f new eligib	le assets f				w eligible		inding	_
			Of wh		mentally sust	tainable	1	Of wt	nich environ		stainable				nentally su	stainable	Proportion			h environm		stainable			h environm		stainable	ſ		hich envi	ronment	ally	Propo ion o
				Of which specialised lending	Of-white	Of			Of which specialised lending		Of which enabling			Of which specialis			of total assets covered			Of which		Of which enabling			Of which	Of which adaption	Of which			Of which speciali	Of which transiti	Of which enablin	new assets overe
the der	npared to total covered assets in nominator)			-					_					l										$\rightarrow$					- 1	ienang	n '	-	
1 G		40.41 %	4.27 %	4.25 %	- %	0.02 5	0.01 %	- %	- %	- %	- %	40.42 %	4.27 %	4.25 %	- %	0.02 %	44.32 %	28.14 %	2.07 %	2.07 %	- %	- %	- %	- %	- %	- %	- %	28.14 %	2.07 %	2.07 %	- %	- %	18.88
2 1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	62.15 %	6.57 %	6.54 %	- %	6 0.03 1	60.01 %	- %	- %	- ×	- %	62.16 %	6.57 %	6.54 %	- %	0.03 %	44.32 %	72.33 %	5.32 %	5.32 %	- %	- %	- %	- %	- %	- %	- %	72.34 %	5.32 %	5.32 %	- %	- %	38.88
3	Financial corporations	- %	- %	- %	- %	6 - 5	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	13.99 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	6.53
4	Credit institutions	- %	- %	- %	- %	5 - 5	- %	- %	- %	- %	- %	- %	- 9	- %	- %	- %	9.40 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.00
5	Other financial corporations	- %	- %	- %	- %	5 - 5	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	4.60 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	6.53
6	of which investment firms	- %	- %	- %	- %	6 - 5	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.26 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	1.00
7	of which management companies	- %	- %	- %	- %	6 - 1	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.00 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- 9
8	of which insurance undertakings	- %	- %	- %	- %	6 - 5	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.02 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.06
9	Non-financial corporations subject to NFRD disclosure obligations	22.68 %	2.03 %	- %	- %	2.03 1	6 0.69 %	- %	- %	- ×	- %	23.37 %	2.03 %	- %	- %	2.03 %	0.62 %	34.06 %	- %	- %	- %	- %	0.04 %	- %	- %	- %	- %	34.10 %	- %	- %	- %	- %	1.17
10	Households	92.30 %	9.76 %	9.76 %	- %	- 5	4					92.30 %	9.76 %	9.76 %	- %	- %	29.69 %	88.94 %	6.63 %	6.63 %	- %	- %						88.94 %	6.63 %	6.63 %	- %	- %	31.18
11	of which loans collateralised by residential immovable property	99.90 %	11.36 %	11.36 %	- %	1						99.90 %	11.36 %	11.36 %	- %	- %	25.50 %	99.98 %	8.71 %	8.71 %	- %	- %						99.98 %	8.71 %	8.71 %	- %	- %	23.74
12	of which building renovation loans	100.00 %	- %	- %	- %	6 - 5						100.00 %	- %	- %	- %	- %	0.00 %	100.00 %	- %	- %	- %	- %						100.00 9	- %	- %	- %	- %	0.02 1
13	of which motor vehicle loans	100.00 %	- %	- %	- %	6 - 5	4					100.00 %	- %	- %	- %	- %	0.58 %	100.00 %	- %	- %	- %	- %						100.00 9	- %	- %	- %	- %	1.79
14	Local government financing	- %	- %	- %	- %	6 - 5	4					- %	- %	- %	- %	- %	0.02 %	- %	- %	- %	- %	- %						- %	- %	- %	- %	- %	0.01
15	Housing financing	- %	- %	- %	- %	- 5	4					- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %						- %	- %	- %	- %	- %	-
16	Other local governments financing	- %	- %	- %	- %	6 - 5	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.02 %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %	0.01
17	Collateral obtained by taking possession: residential and commercial immovable	- %	- %	- %	- 9	- 1						- %	- %	- %	- %	- %	0.00 %	- %	- %	- %	- %	- %						- %	- %	- %	- %	- %	_

90: Template 10 - Other climate change mitigating actions that are not covered in the EU Taxonomy

As per Article 449a CRR, this template covers other climate change mitigating actions and includes exposures of the institutions that are not taxonomy-aligned as referred to in Regulation (EU) 2020/852 according to templates 7 and 8 but that still support counterparties in the transition and adaptation process for the objectives of climate change mitigation and climate change adaptation.

The Group has carried out its EU Taxonomy alignment assessment, the results of which has been disclosed in ESG Templates 6, 7 and 8. From the EU Taxonomy assessment conducted at 31st December 2024, c.€4.1 billion in lending was assessed as EU taxonomy aligned, with these assets being reported separately in ESG templates 6, 7 and 8. In line with the Dec 2023 restatement, additional household exposures have been included, that otherwise would have been disclosed in Template 6, 7 and 8.

	а	b	с	d	e	f
	Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1		Financial corporations	747	Yes		The green bonds held in AIB's Socially Responsible Investment (SRI) Bond Portfolio fund domestic, EU-based and international projects aimed at global sustainability and carbon emission reduction. The SRI Bond Portfolio is underpinned by our SRI Bond Framework which is publicly available (aib-sri-framework, add). The SRI Bond Framework explicitly sets out AIB's minimum investment criteria when considering green bonds in addition to other ESG bonds. The criteria ensures that only higher quality issuers, measured on key sustainability metrics, qualify for inclusion in AIB's SRI Bond Portfolio.
2	sustainable, sustainability-linked under standards other than the EU standards)	Non-financial corporations	135	Vec		Examples of eligible green projects being funded: Renewable energy, energy efficiency, green buildings, climate change adaption, pollution prevention and control, clean transportation, sustainable water management etc.
F		Of which Loans collateralised by	135	res	NO	
3		commercial immovable property	_	_	_	
4		Other counterparties	788	Yes	No	
5		Financial corporations	625	Yes		The information disclosed in this template consists of lending activity as per the Group's Sustainable Lending Framework (SLF), as at 31st December 2024. The SLF is an internal AlB Framework that outlines the key parameters on which a transaction can be classified as green or transitional and is
6		Non-financial corporations	6,867	Yes		available on our website (https://aib.ie/sustainability). In 2024, the definition was expanded and has been applied to all new relevant lending activity from 1 January 2024.
7	Loans (e.g. green, sustainable, sustainability-linked	Of which Loans collateralised by commercial immovable property	2,465	Yes		Exposures of c.E15.2 billion included in this template consist of the portion of the Group's green or transition lending, as defined in the SIF, that has not been assessed as EU Taxonomy aligned. An additional c.E4.1 billion of lending that has been assessed as EU Taxonomy aligned is disclosed in templates 6, 7 and 8.
8	under standards other than the FU	Households	7,688	Yes	No	AlB will use the Sustainable Lending Framework to classify new Green and Transition lending that reference to specific Use of Proceeds or General-Purpose criteria defined in the Framework. All new
9	, ,	Of which Loans collateralised by residential immovable property	7,657	Yes		lending requests shall be processed as part of the usual credit process, subject to AIBs credit policies and procedures.
10		Of which building renovation loans				
11		Other counterparties	_	_	_	
_						

Article 431 Article 431(1)		AIB Group compliance reference
Article 431(1)	Article 431 Disclosure requirements and policies	
	Institutions shall publicly disclose the information referred to in Titles II and III in accordance with the provisions laid down in this Title, subject to the exceptions referred to in Article 432.	AIB Group plc Pillar 3 Disclosures at 31 December 2024 ("P3").
Article 431(2)	Institutions that have been granted permission by the competent authorities under Part Three for the instruments and methodologies referred to in Title III of this Part shall publicly disclose the information laid down therein.	AIB will publicly disclose the relevant information under Title III Qualifying Requirements for the Use of Particular Instruments or Methodologies that AIB has been granted permission by the competent authority under Part Three for the instruments and methodologies. See Article 452 - 455 below for details.
Article 431(3)	The management body or senior management shall adopt formal policies to comply with the disclosure requirements laid down in this Part and put in place and maintain internal processes, systems and controls to verify that the institutions' disclosures are appropriate and in compliance with the requirements laid down in this Part. At least one member of the management body or senior management shall attest in writing that the relevant institution has made the disclosures required under this Part in accordance with the formal policies and internal processes, systems and controls. The written attestation and the key elements of the institution's formal policies to comply with the disclosure requirements shall be included in institutions' disclosures.  Information to be disclosed in accordance with this Part shall be subject to the same level of internal verification as that applicable to the management report included in the institution's financial report.  Institutions shall also have policies in place to verify that their disclosures convey their risk profile comprehensively to market participants. Where institutions find that the disclosures required under this Part do not convey the risk profile comprehensively to market participants, they shall publicly disclose information in addition to the information required to be disclosed under this Part.  Nonetheless, institutions shall only be required to disclose information that is material and not proprietary or confidential as referred to in Article 432.	Annual - Table EU CCRA – Qualitative disclosure related to CCR: Row (d).  The Group maintains a formal Pillar 3 disclosure policy which is reviewed annually and subject to approval within the Group's internal governance framework.  The Pillar 3 disclosures have been subject to internal review procedures and have not been audited by the Group's external auditors.  Introduction: Attestation that disclosures are in accordance with formal policies and internal processes, systems and controls.
Article 431(4)	All quantitative disclosures shall be accompanied by a qualitative narrative and any other supplementary information that may be necessary in order for the users of that information to understand the quantitative disclosures, noting in particular any significant change in any given disclosure compared to the information contained in the previous disclosures.	AlB will ensure all quantitative disclosures will be accompanied by a qualitative narrative and any other supplementary information that may be necessary in order for the users of that information to understand the quantitative disclosures, noting in particular any significant change in any given disclosure compared to the information contained in the previous disclosures.
		Annual - Table EU CCRA – Qualitative disclosure related to CCR: Row (d).
Article 431(5)	Institutions shall, if requested, explain their rating decisions to SMEs and other corporate applicants for loans, providing an explanation in writing when asked. The administrative costs of that explanation shall be proportionate to the size of the loan.	AlB provides explanations of ratings decisions to SMEs whose loan applications were declined in writing, if requested. AlB participates in a formal appeals process, overseen by a Government appointed Head of Credit Review. In the case of larger corporates, written explanations are not usually requested as direct discussions with relationship managers takes place.
Article 432	Article 432 Non-material, proprietary or confidential information	
Article 432(1)	With the exception of the disclosures laid down in point (c) of Article 435(2) and in Articles 437 and 450, institutions may omit one or more of the disclosures listed in Titles II and III where the information provided by those disclosures is not regarded as material.  Information in disclosures shall be regarded as material where its omission or misstatement could change or influence the assessment or decision of a user of that information relying on it for the purpose of making economic decisions.  EBA shall issue guidelines, in accordance with Article 16 of Regulation (EU) No 1093/2010, on how institutions have to apply materiality in relation to the disclosure requirements of Titles II and III.	AIB complies with all relevant disclosure requirements with regards to materiality.
Article 432(2)	Institutions may also omit one or more items of information referred to in Titles II and III where those items include information that is regarded as proprietary or confidential in accordance with this paragraph, except for the disclosures laid down in Articles 437 and 450.  Information shall be regarded as proprietary to institutions where disclosing it publicly would undermine their competitive position. Proprietary information may include information on products or systems that would render the investments of institutions therein less valuable, if shared with competitors.  Information shall be regarded as confidential where the institutions are obliged by customers or other counterparty relationships to keep that information confidential.  EBA shall issue guidelines, in accordance with Article 16 of Regulation (EU) No 1093/2010, on how institutions have to apply proprietary and confidentiality in relation to the disclosure requirements of Titles II and	AIB does not omit any information on the grounds that it may be proprietary or confidential.
	III.	
Article 432(3)	III.  In the exceptional cases referred to in paragraph 2, the institution concerned shall state in its disclosures the fact that specific items of information are not being disclosed and the reason for not disclosing those items, and publish more general information about the subject matter of the disclosure requirement, except where that subject matter is, in itself, proprietary or confidential.	Not applicable.

Article 433	Institutions shall publish the disclosures required under Titles II and III in the manner set out in Articles 433a, 433b and 433c.	This publication is in line with Article 433a.
	Annual disclosures shall be published on the same date as the date on which institutions publish their financial statements or as soon as possible thereafter.	The Pillar 3 disclosures are published as soon as possible after the publication of the financial report for the corresponding period on an annual and semi-annual basis. The quarterly Pillar 3 disclosures are published as soon as possible after the submission of the quarterly returns to the regulator.
	Semi-annual and quarterly disclosures shall be published on the same date as the date on which the institutions publish their financial reports for the corresponding period where applicable or as soon as possible thereafter.	. ,
	Any delay between the date of publication of the disclosures required under this Part and the relevant financial statements shall be reasonable and, in any event, shall not exceed the timeframe set by competent authorities pursuant to Article 106 of Directive 2013/36/EU.	
Article 433a	Article 433a Disclosures by large institutions	
Article 433a(1)	Large institutions shall disclose the information outlined below with the following frequency:	AIB Group as a large institution prepares disclosures in line with this article.
Article 433a(1)(a)	(a) all the information required under this Part on an annual basis;	See below for applicable disclosure requirements.
		Not Applicable. Annual Template EU INS1 Insurance participations. Article 49 is not applicable.
		Not Applicable. Annual Template EU INS2 Financial conglomerates - Information on own funds and capital adequacy ratio. AIB is not a financial conglomerate.
		Not Applicable. Annual Template EU MRB Qualitative disclosure requirements for institutions using the internal Market Risk Models. All market risk is treated under standardised approach.
Article 433a(1)(b)	(b) on a semi-annual basis the information referred to in:	See below for applicable disclosure requirements.
Article 433a(1)(b)(i)	(i) point (a) of Article 437;	Semi-annual - Template EU CC1 - Composition of regulatory own funds.
		Semi-annual - EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements.
Article 433a(1)(b)(ii)	(ii) point (e) of Article 438;	Not applicable. Semi-annual - Template EU CR10 - Specialised lending and equity exposures under the simple risk weighted approach. All does not use the simple risk weight approach for specialised lending or equity exposures.
Article 433a(1)(b)(iii)	(iii) points (e) to (I) of Article 439;	Semi annual - Template EU CCR1 – Analysis of CCR exposure by approach.
		Semi annual - Template EU CCR2 – Transactions subject to own funds requirements for CVA risk.
		Semi annual - Template EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights.
		Semi annual - Template EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale.
		Semi annual - Template EU CCR5 – Composition of collateral for CCR exposures
		Semi annual - Template EU CCR6 – Credit derivatives exposures.
		Semi annual - Template EU CCR8 – Exposures to CCPs.
Article 433a(1)(b)(iv)	(iv) Article 440;	Semi annual - Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer.
		Semi annual - Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer.

Article 433a(1)(b)(v)	(v) points (c), (e), (f) and (g) of Article 442;	Semi annual - Template EU CR1 - Performing and non-performing
, and the second	(7)	exposures and related provisions.
		Semi annual - Template EU CR1-A - Maturity of exposures.
		Semi annual - Template EU CR2 - Changes in the stock of non- performing loans and advances, ( Note at year end if publishing EU CR2-a, AIB will not publish EU CR2); Due to AIB Group plc NPL ratio being lower than 5% AIB publishes Template EU CR2.
		Not applicable. Annual & threshold - Template EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries. AlB Group plc's NPL ratio is lower than 5%.
		Semi annual - Template EU CQ1 - Credit quality of forborne exposures.
		Not applicable. Annual & threshold - Template EU CQ2 - Quality of forbearance. AIB Group plc's NPL ratio is lower than 5%.
		Annual - Template EU CQ3 - Credit quality of performing and non-performing exposures by past due days.
		Annual & threshold based (cols b and d); Semi annual (cols a, c, e, f and g only)- Template EU CQ4 - Quality of non-performing exposures by geography. Note column (b) and (d) are not applicable, because AIB Group plc's NPL ratio is lower than 5%.
		Annual & threshold based (cols b and d); Semi annual (cols a, c, e and f) - Template EU CQ5 - Credit quality of loans and advances by industry. Note column (b) and (d) are not applicable, because AIB Group plc's NPL ratio is lower than 5%.
		Not applicable. Annual & threshold - Template EU CQ6 - Collateral valuation - loans and advances. AIB Group plc's NPL ratio is lower than 5%.
		Semi annual - Template EU CQ7 - Collateral obtained by taking possession and execution processes.
		Not applicable. Annual & threshold - Template EU CQ8 - Collateral obtained by taking possession and execution processes – vintage breakdown. AIB Group plc's NPL ratio is lower than 5%.
Article 433a(1)(b)(vi)	(vi) point (e) of Article 444;	Semi annual - Template EU CR5 – standardised approach.
Article 433a(1)(b)(vii)	(vii) Article 445;	Semi annual - Template EU MR1 – Market risk under the standardised approach.
Article 433a(1)(b)(viii)	(viii) point (a) and (b) of Article 448(1);	Semi annual - Template EU IRRBB1 - Interest rate risks of non-trading
Article 433a(1)(b)(ix)	(ix) point (j) to (l) of Article 449;	book activities.  Semi annual - Template EU SEC1 - Securitisation exposures in the non-trading book.
		Not Applicable. Semi-annual - Template EU SEC2 - Securitisation exposures in the trading book. AIB does not have securitised exposures in the trading book.
		Not Applicable. Semi-annual - Template EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor. AIB does not act as originator or as sponsor.
		Semi annual - Template EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor.
		Not Applicable. Semi-annual - Template EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments. AlB does not have exposures securitised that are in default or have specific credit risk adjustments.
Article 433a(1)(b)(x)	(x) points (a) and (b) of Article 451(1);	Semi annual - Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures.
		Semi annual - Template EU LR2 - LRCom: Leverage ratio common disclosure.
		Semi annual - Template EU LR3 - LRSpl: Split-up of on-balance sheet exposures (excluding derivatives, SFTs and exempted exposures).
Article 433a(1)(b)(xi)	(xi) Article 451a(3);	Semi annual - Template EU LIQ2 - Net Stable Funding Ratio.
Article 433a(1)(b)(xii)	(xii) point (g) of Article 452;	Semi annual - Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range.
	(10)	Semi annual - Template EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale.
Article 433a(1)(b)(xiii)	(xiii) points (f) to (j) of Article 453;	Semi annual - Template EU CR3 — CRM techniques overview: Disclosure of the use of credit risk mitigation techniques.
		Semi annual - Template EU CR4 – standardised approach – Credit risk exposure and CRM effects.
		Semi annual - Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques.
		Semi annual - Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques.

Article 433a(1)(b)(xiv)	(xiv) points (d), (e) and (g) of Article 455;	Not applicable. Semi annual - Template EU MR2–A Market risk under the Internal Model Approach (IMA). All market risk is treated under standardised approach.
		Not applicable. Semi annual - Template EU MR3 IMA values for trading portfolios. All market risk is treated under standardised approach.
		Not applicable. Semi annual - Template EU MR4 Comparison of VaR estimates with gains/losses. All market risk is treated under standardised approach.
Article 433a(1)(c)	(c) on a quarterly basis the information referred to in:	See below for applicable disclosure requirements.
Article 433a(1)(c)(i)	(i) points (d) and (h) of Article 438;	Quarterly - Template EU OV1 – Overview of risk weighted exposure amounts.
		Quarterly - Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach.
		Not applicable. Quarterly - Template EU CCR7 – RWEA flow statements of CCR exposures under the IMM. AIB does not use the IMM and instead use SA-CCR for derivatives under counterparty credit risk.
		Not applicable. Quarterly - Template EU MR2–B - RWEA flow statements of market risk exposures under the IMA. All market risk is treated under standardised approach.
Article 433a(1)(c)(ii)	(ii) the key metrics referred to in Article 447;	Quarterly - Template EU KM1 - Key metrics template.
Article 433a(1)(c)(iii)	(iii) Article 451a(2).	Quarterly - Template EU LIQ1 - Quantitative information of LCR.
		Quarterly - Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1.
Article 433a(2)	By way of derogation from paragraph 1, large institutions other than G- SIIs that are non-listed institutions shall disclose the information outlined below with the following frequency:	Not applicable.
Article 433a(2)(a) &	(a) all the information required under this Part on an annual basis;	Not applicable.
(b)	(b) the key metrics referred to in Article 447 on a semi-annual basis.	
Article 433a(3)	Large institutions that are subject to Article 92a or 92b shall disclose the information required under Article 437a on a semi-annual basis, except for the key metrics referred to in point (h) of Article 447, which are to be disclosed on a quarterly basis.	Not applicable.
Article 433b	Article 433b Disclosures by small and non-complex institutions	Not applicable.
Article 433b(1)	Small and non-complex institutions shall disclose the information	Not applicable.
	outlined below with the following frequency:	
Article 433b(1)(a)	(a) on an annual basis the information referred to in:	Not applicable.
Article 433b(1)(a)(i)	(i) points (a), (e) and (f) of Article 435(1);	Not applicable.
Article 433b(1)(a)(ii)	(ii) point (d) of Article 438;	Not applicable.
Article 433b(1)(a)(iii)	(iii) points (a) to (d), (h), (i), (j) of Article 450(1);	Not applicable.
Article 433b(1)(b)	(b) on a semi-annual basis the key metrics referred to in Article 447.	Not applicable.
Article 433b(2)	By way of derogation from paragraph 1 of this Article, small and non- complex institutions that are non-listed institutions shall disclose the key metrics referred to in Article 447 on an annual basis.	Not applicable.
Article 433c	Article 433c Disclosures by other institutions	Not applicable.
Article 433c(1)	Institutions that are not subject to Article 433a or 433b shall disclose the information outlined below with the following frequency:	Not applicable.
Article 433c(1)(a)	(a) all the information required under this Part on an annual basis;	Not applicable.
Article 433c(1)(a)	(b) the key metrics referred to in Article 447 on a semi-annual basis.	Not applicable.
Article 433c(2)	By way of derogation from paragraph 1 of this Article, other institutions that are non-listed institutions shall disclose the following information on an annual basis:	Not applicable.
Article 433c(2)(a)	(a) points (a), (e) and (f) of Article 435(1);	Not applicable.
Article 433c(2)(b)	(b) points (a, (b) and (c) of Article 435(2);	Not applicable.
Article 433c(2)(c)	(c) point (a) of Article 437;	Not applicable.
Article 433c(2)(d)	(d) points (c) and (d) of Article 438;	Not applicable.
Article 433c(2)(e)	(e) the key metrics referred to in Article 447;	Not applicable.
Article 433c(2)(f)	(f) points (a) to (d), (h) to (k) of Article 450(1).	Not applicable.
Article 434	Article 434 Means of disclosures	
Article 434(1)	Institutions shall disclose all the information required under Titles II and III in electronic format and in a single medium or location. The single medium or location shall be a standalone document that provides a readily accessible source of prudential information for users of that information or a distinctive section included in or appended to the institutions' financial statements or financial reports containing the required disclosures and being easily identifiable to those users.	The Pillar 3 disclosures are published on AIB Group's website (https://aib.ie/investorrelations).
Article 434(2)	website, in any other appropriate location an archive of the information required to be disclosed in accordance with this Part. That	(https://aib.ie/investorrelations). Pillar 3 disclosures from previous years and Allied Irish Banks, p.l.c. disclosures are also available on
Article 434a	Article 434a Uniform disclosure formats	

Article 434a	EBA shall develop draft implementing technical standards specifying uniform disclosure formats, and associated instructions in accordance with which the disclosures required under Titles II and III shall be made. Those uniform disclosure formats shall convey sufficiently comprehensive and comparable information for users of that information to assess the risk profiles of institutions and their degree of compliance with the requirements laid down in Parts One to Seven. To facilitate the comparability of information, the implementing technical standards shall seek to maintain consistency of disclosure formats with international standards on disclosures.  Uniform disclosure formats shall be tabular where appropriate.  EBA shall submit those draft implementing technical standards to the	EBA published the final version of the ITS on 21/04/2021: Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council and repealing Commission Implementing Regulation (EU) No 1423/2013, Commission Delegated Regulation (EU) 2015/1555, Commission Implementing Regulation (EU) 2016/200 and Commission Delegated Regulation (EU) 2017/2295.  AIB is compliant with the amended version as per EU official journal.
	Commission by 28 June 2020.  Power is conferred on the Commission to adopt those implementing	
	technical standards in accordance with Article 15 of Regulation (EU) No 1093/2010.	
Article 435	Article 435 Disclosure of risk management objectives and policies	
Article 435(1)	Institutions shall disclose their risk management objectives and policies for each separate category of risk, including the risks referred to in this Title. Those disclosures shall include:	Annual - Table EU OVA - Institution risk management approach.  Annual - Table EU LIQA - Liquidity risk management.
Article 435(1)(a)	(a) the strategies and processes to manage those categories of risks;	Annual - Table EU ORA - Qualitative information on operational risk.  Annual - Table EU OVA - Institution risk management approach.
		Annual - Table EU LIQA - Liquidity risk management.
		Annual - Table EU CRA - General qualitative information about credit risk.
		Annual - Table EU MRA - Qualitative disclosure requirements related to market risk.
		Annual Table EU ORA - Qualitative information on operational risk.
Article 435(1)(b)	(b) the structure and organisation of the relevant risk management function including information on the basis of its authority, its powers	Annual - Table EU OVA - Institution risk management approach.
	and accountability in accordance with the institution's incorporation and governing documents;	Annual - Table EU LIQA - Liquidity risk management.  Annual - Table EU CRA - General qualitative information about credit
		risk.  Annual - Table EU MRA - Qualitative disclosure requirements related to market risk.
		Annual - Table EU ORA - Qualitative information on operational risk.
Article 435(1)(c)	(c) the scope and nature of risk reporting and measurement systems;	Annual - Table EU OVA - Institution risk management approach.
		Annual - Table EU LIQA - Liquidity risk management.  Annual - Table EU MRA - Qualitative disclosure requirements related to market risk.
		Annual - Table EU ORA - Qualitative information on operational risk.
Article 435(1)(d)	(d) the policies for hedging and mitigating risk, and the strategies and	Annual - Table EU OVA - Institution risk management approach.
	processes for monitoring the continuing effectiveness of hedges and mitigants;	Annual - Table EU LIQA - Liquidity risk management.
		Annual - Table EU CRA - General qualitative information about credit risk.
		Annual - Table EU MRA - Qualitative disclosure requirements related to market risk.
		Annual - Table EU ORA - Qualitative information on operational risk.
Article 435(1)(e)	<ul> <li>(e) a declaration approved by the management body on the adequacy of the risk management arrangements of the relevant institution providing assurance that the risk management systems put in place are adequate with regard to the institution's profile and strategy;</li> </ul>	Annual - Table EU OVA - Institution risk management approach.  Annual - Table EU LIQA - Liquidity risk management.
Article 435(1)(f)	(f) a concise risk statement approved by the management body succinctly describing the relevant institution's overall risk profile	Annual - Table EU OVA - Institution risk management approach.
	associated with the business strategy; that statement shall include:	Annual - Table EU LIQA - Liquidity risk management.  Annual - Table EU CRA - General qualitative information about credit
Autiala #25/43/5/0	(i) how ratios and flavore and the same	risk.
Article 435(1)(f)(i)	<ul><li>(i) key ratios and figures providing external stakeholders a comprehensive view of the institution's management of risk, including how the risk profile of the institution interacts with the risk tolerance set by the management body;</li></ul>	Annual - Table EU OVA - Institution risk management approach.  Annual - Table EU LIQA - Liquidity risk management.
Article 435(1)(f)(ii)	<ul> <li>(ii) information on intragroup transactions and transactions with related parties that may have a material impact of the risk profile of the consolidated group.</li> </ul>	Annual - Table EU OVA - Institution risk management approach.  Annual - Table EU LIQA - Liquidity risk management.
Article 435(2)	Institutions shall disclose the following information regarding governance arrangements:	Annual - Table EU OVB - Disclosure on governance arrangements.
Article 435(2)(a)	(a) the number of directorships held by members of the management	Annual - Table EU OVB - Disclosure on governance arrangements.
Article 435(2)(b)	body;  (b) the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise;	Annual - Table EU OVB - Disclosure on governance arrangements.
Article 435(2)(c)	(c) the policy on diversity with regard to selection of members of the management body, its objectives and any relevant targets set out in that policy, and the extent to which those objectives and targets have been achieved:	Annual - Table EU OVB - Disclosure on governance arrangements.
Article 435(2)(d)	(d) whether or not the institution has set up a separate risk	Annual - Table EU OVB - Disclosure on governance arrangements.
	committee and the number of times the risk committee has met;	

Article 435(2)(e)	(e) the description of the information f low on risk to the management body.	Annual - Table EU OVB - Disclosure on governance arrangements.
Article 436	Article 436 Disclosure of the scope of application	
Article 436	Institutions shall disclose the following information regarding the scope of application of this Regulation as follows:	See below for applicable disclosure requirements.
Article 436(a)	(a) the name of the institution to which this Regulation applies;	AIB Group plc.
Article 436(b)	(b) a reconciliation between the consolidated financial statements prepared in accordance with the applicable accounting framework and the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One; that reconciliation shall outline the differences between the accounting and regulatory scopes of consolidation and the legal entities included within the regulatory scope of consolidation where it differs from the accounting scope of consolidation; the outline of the legal entities included within the regulatory scope of consolidation where it be legal entities included within the regulatory consolidation where it is different from the accounting consolidation method, whether those entities are fully or proportionally consolidated and whether the holdings in those legal entities are deducted from own funds;	Annual - Template EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity).  Annual - Table EU LIA - Explanations of differences between accounting and regulatory exposure amounts.
Article 436(c)	(c) a breakdown of assets and liabilities of the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One, broken down by type of risks as referred to under this Part;	Annual - Template EU LI1 — Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories.
Article 436(d)	(d) a reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation as defined in Sections 2 and 3 of Title II of Part One, and the exposure amount used for regulatory purposes; that reconciliation shall be supplemented by qualitative information on those main sources of differences;	Annual - Template EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements.  Annual - Table EU LIA - Explanations of differences between accounting and regulatory exposure amounts.
Article 436(e)	(e) for exposures from the trading book and the non-trading book that are adjusted in accordance with Article 34 and Article 105, a breakdown of the amounts of the constituent elements of an institution's prudent valuation adjustment, by type of risks, and the total of constituent elements separately for the trading book and non-trading book positions;	Annual - Template EU PV1 - Prudent valuation adjustments (PVA).
Article 436(f)	<ul> <li>(f) any current or expected material practical or legal impediment to the prompt transfer of own funds or to the repayment of liabilities between the parent undertaking and its subsidiaries;</li> </ul>	Annual - Table EU LIB - Other qualitative information on the scope of application.
Article 436(g)	<ul><li>(g) the aggregate amount by which the actual own funds are less than required in all subsidiaries that are not included in the consolidation, and the name or names of those subsidiaries;</li></ul>	Annual - Table EU LIB - Other qualitative information on the scope of application.
Article 436(h)	(h) where applicable, the circumstances under which use is made of the derogation referred to in Article 7 or the individual consolidation method laid down in Article 9.	Annual - Table EU LIB - Other qualitative information on the scope of application.
Article 437 Article 437	Article 437 Disclosure of own funds  Institutions shall disclose the following information regarding their own funds:	See below for applicable disclosure requirements.
Article 437(a)	(a) a full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and the filters and deductions applied to own funds of the institution pursuant to Articles 32 to 36, 56, 66 and 79 with the balance sheet in the audited financial statements of the institution;	Semi annual - Template EU CC1 - Composition of regulatory own funds.  Semi annual - Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements.
Article 437(b)	(b) a description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the institution;	Annual - Template EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments.
Article 437(c)	(c) the full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Annual - Template EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments.
Article 437(d)	(d) a separate disclosure of the nature and amounts of the following:	Semi annual - Template EU CC1 - Composition of regulatory own funds.
Article 437(d)(i)	(i) each prudential filter applied pursuant to Articles 32 to 35;	Semi annual - Template EU CC1 - Composition of regulatory own funds.
Article 437(d)(ii)	(ii) items deducted pursuant to Articles 36, 56 and 66;	Semi annual - Template EU CC1 - Composition of regulatory own
Article 437(d)(iii)	(iii) items not deducted pursuant to Articles 47, 48, 56, 66 and 79;	funds. Semi annual - Template EU CC1 - Composition of regulatory own
Article 437(e)	(e) a description of all restrictions applied to the calculation of own funds in accordance with this Regulation and the instruments, prudential filters and deductions to which those restrictions apply:	funds.  Semi annual - Template EU CC1 - Composition of regulatory own funds.
Article 437(f)	(f) a comprehensive explanation of the basis on which capital ratios are calculated where those capital ratios are calculated by using elements of own funds determined on a basis other than the basis laid down in this Regulation.	Semi annual - Template EU CC1 - Composition of regulatory own funds.
Article 437a	Article 437a Disclosure of own funds and eligible liabilities	Not applicable.
Article 437a	Institutions that are subject to Article 92a or 92b shall disclose the following information regarding their own funds and eligible liabilities:	Not applicable.
Article 437a(a)	(a) the composition of their own funds and eligible liabilities, their maturity and their main features;	Not applicable.
Article 437a(b)	(b) the ranking of eligible liabilities in the creditor hierarchy;	Not applicable.
Article 437a(c)	(c) the total amount of each issuance of eligible liabilities instruments referred to in Article 72b and the amount of those issuances that is included in eligible liabilities items within the limits specified in Article 72b(3) and (4);	Not applicable.
Article 437a(d)	(d) the total amount of excluded liabilities referred to in Article 72a(2).	Not applicable.
Article 438	Article 438 Disclosure of own funds requirements and risk-weighted exposure amounts	
Article 438	Institutions shall disclose the following information regarding their compliance with Article 92 of this Regulation and with the requirements laid down in Article 73 and in point (a) of Article 104(1) of Directive 2013/36/EU:	See below for applicable disclosure requirements.

Article 438(a)	(a) a summary of their approach to assessing the adequacy of their internal capital to support current and future activities;	Annual - Table EU OVC – ICAAP information.
Article 438(b)	(b) the amount of the additional own funds requirements based on the supervisory review process as referred to in point (a) of Article 104(1) of Directive 2013/36/EU and its composition in terms of Common Equity Tier 1, additional Tier 1 and Tier 2 instruments;	Annual disclosure requirement on Template EU KM1 – Key metrics template.
Article 438(c)	(c) upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process;	Annual - Table EU OVC – ICAAP information.
Article 438(d)	(d) the total risk-weighted exposure amount and the corresponding total own funds requirement determined in accordance with Article 92, to be broken down by the different risk categories set out in Part Three and, where applicable, an explanation of the effect on the calculation of own funds and risk-weighted exposure amounts that results from applying capital floors and not deducting items from own	Quarterly - Template EU OV1 – Overview of total risk exposure amounts.  Additional explanation is currently not relevant.
Article 438(e)	funds;  (e) the on- and off-balance-sheet exposures, the risk-weighted exposure amounts and associated expected losses for each category of specialised lending referred to in Table 1 of Article 153(5) and the on- and off-balance-sheet exposures and risk-weighted exposure amounts for the categories of equity exposures set out in Article 155(2);	Not applicable. Semi-annual - Template EU CR10 - Specialised lending and equity exposures under the simple risk weighted approach. AlB does not use the simple risk weight approach for specialised lending or equity exposures.
Article 438(f)	(f) the exposure value and the risk-weighted exposure amount of own funds instruments held in any insurance undertaking, reinsurance undertaking or insurance holding company that the institutions do not deduct from their own funds in accordance with Article 49 when calculating their capital requirements on an individual, subconsolidated and consolidated basis;	Not applicable. Annual - Template EU INS1 - Insurance participations. Article 49 is not applicable.
Article 438(g)	(g) the supplementary own funds requirement and the capital adequacy ratio of the financial conglomerate calculated in accordance with Article 6 of Directive 2002/87/EC and Annex I to that Directive where method 1 or 2 set out in that Annex is applied;	Not applicable. Annual- Template EU INS2 - Financial conglomerates - Information on own funds and capital adequacy ratio. AIB is not a financial conglomerate.
Article 438(h)	(h) the variations in the risk-weighted exposure amounts of the current disclosure period compared to the immediately preceding	Quarterly - Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach.
	disclosure period that result from the use of internal models, including an outline of the key drivers explaining those variations.	Not applicable. Quarterly - Template EU CCR7 – RWEA flow statements of CCR exposures under the IMM. AIB does not use the IMM and instead use SA-CCR for derivatives under counterparty credit risk.
		Not applicable. Quarterly - Template EU MR2–B - RWEA flow statements of market risk exposures under the IMA. All market risk is treated under standardised approach.
Article 439 Article 439	Article 439 Disclosure of exposures to counterparty credit risk  Institutions shall disclose the following information regarding their exposure to counterparty credit risk as referred to in Chapter 6 of Title II of Part Three:	See below for applicable disclosure requirements.
Article 439(a)	(a) a description of the methodology used to assign internal capital and credit limits for counterparty credit exposures, including the methods to assign those limits to exposures to central counterparties;	Annual - Table EU CCRA – Qualitative disclosure related to CCR.
Article 439(b)	<ul> <li>(b) a description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves;</li> </ul>	Annual - Table EU CCRA – Qualitative disclosure related to CCR.
Article 439(c)	(c) a description of policies with respect to General Wrong-Way risk and Specific Wrong-Way risk as defined in Article 291;	Annual - Table EU CCRA – Qualitative disclosure related to CCR.
Article 439(d)	<ul><li>(d) the amount of collateral the institution would have to provide if its credit rating was downgraded;</li></ul>	Annual - Table EU CCRA – Qualitative disclosure related to CCR.
Article 439(e)	<ul> <li>(e) the amount of segregated and unsegregated collateral received and posted per type of collateral, further broken down between collateral used for derivatives and securities financing transactions;</li> </ul>	Semi annual - Template EU CCR5 – Composition of collateral for CCR exposures.
Article 439(f)	(f) for derivative transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Sections 3 to 6 of Chapter 6 of Title II of Part Three, whichever method is applicable, and the associated risk exposure amounts broken down by applicable method;	Semi annual - Template EU CCR1 – Analysis of CCR exposure by approach.
Article 439(g)	(g) for securities financing transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Chapters 4 and 6 of Title II of Part Three, whichever method is used, and the associated risk exposure amounts broken down by applicable method;	Semi annual - Template EU CCR1 – Analysis of CCR exposure by approach.
Article 439(h)	<ul> <li>(h) the exposure values after credit risk mitigation effects and the associated risk exposures for credit valuation adjustment capital charge, separately for each method as set out in Title VI of Part Three;</li> </ul>	Semi annual - Template EU CCR2 – Transactions subject to own funds requirements for CVA risk.
Article 439(i)	(i) the exposure value to central counterparties and the associated risk exposures within the scope of Section 9 of Chapter 6 of Title II of Part Three, separately for qualifying and non-qualifying central counterparties, and broken down by types of exposures;	Semi annual - Template EU CCR8 – Exposures to CCPS.
Article 439(j)	(j) the notional amounts and fair value of credit derivative transactions; credit derivative transactions shall be broken down by product type; within each product type, credit derivative transactions shall be broken down further by credit protection bought and credit protection sold;	Semi annual - Template EU CCR6 – Credit derivatives exposures.
Article 439(k)	<ul> <li>(k) the estimate of alpha where the institution has received the permission of the competent authorities to use its own estimate of alpha in accordance with Article 284(9);</li> </ul>	Semi annual - Template EU CCR1 — Analysis of CCR exposure by approach.
Article 439(I)	(I) separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452;	Semi annual - Template EU CCR3 – standardised approach - CCR exposures by regulatory exposure class and risk weights.
		Semi annual - Template EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale.
Article 439(m)	(m) for institutions using the methods set out in Sections 4 to 5 of Chapter 6 of Title II Part Three, the size of their on- and off-balance-sheet derivative business as calculated in accordance with Article 273a(1) or (2), as applicable.	Semi annual - Template EU CCR1 – Analysis of CCR exposure by approach.

Article 439	Where the central bank of a Member State provides liquidity assistance in the form of collateral swap transactions, the competent authority may exempt institutions from the requirements in points (d) and (e) of the first subparagraph where that competent authority considers that the disclosure of the information referred to therein	Not applicable.  This would impact the following two templates if it were applicable to AIB:
	could reveal that emergency liquidity assistance has been provided. For those purposes, the competent authority shall set out appropriate thresholds and objective criteria.	Semi annual - Template EU CCR1 – Analysis of CCR exposure by approach.
	,	Semi annual - Template EU CCR5 – Composition of collateral for CCR exposures.
Article 440	Article 440 Disclosure of countercyclical capital buffers	
Article 440	Institutions shall disclose the following information in relation to their compliance with the requirement for a countercyclical capital buffer as referred to in Chapter 4 of Title VII of Directive 2013/36/EU:	See below for applicable disclosure requirements.
Article 440(a)	(a) the geographical distribution of the exposure amounts and risk- weighted exposure amounts of its credit exposures used as a basis for the calculation of their countercyclical capital buffer;	Semi annual - Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer.
Article 440(b)	(b) the amount of their institution-specific countercyclical capital buffer.	Semi annual - Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer.
Article 441	Article 441 Disclosure of indicators of global systemic importance	Not applicable. AIB is an O-SII.
Article 441	G-SIIs shall disclose, on an annual basis, the values of the indicators used for determining their score in accordance with the identification methodology referred to in Article 131 of Directive 2013/36/EU.	Not applicable. AIB is an O-SII.
Article 442	Article 442 Disclosure of exposures to credit risk and dilution risk	
Article 442	Institutions shall disclose the following information regarding their exposures to credit risk and dilution risk:	See below for applicable disclosure requirements.
Article 442(a)	<ul> <li>(a) the scope and definitions that they use for accounting purposes of 'past due' and 'impaired' and the differences, if any, between the definitions of 'past due' and 'default' for accounting and regulatory purposes;</li> </ul>	Annual - Table EU CRB - Additional disclosure related to the credit quality of assets.
Article 442(b)	(b) a description of the approaches and methods adopted for determining specific and general credit risk adjustments;	Annual - Table EU CRB - Additional disclosure related to the credit quality of assets.
Article 442(c)	(c) information on the amount and quality of performing, non- performing and forborne exposures for loans, debt securities and off- balance-sheet exposures, including their related accumulated	Semi annual - Template EU CR1- Performing and non-performing exposures and related provisions.
	impairment, provisions and negative fair value changes due to credit risk and amounts of collateral and financial guarantees received;	Not applicable. Annual & threshold - Template EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries. AIB Group plc's NPL ratio is lower than 5%.
		Semi annual - Template EU CQ1 - Credit quality of forborne exposures.
		Not applicable. Annual & threshold - Template EU CQ2 - Quality of forbearance. AIB Group plc's NPL ratio is lower than 5%.
		Annual & threshold based (cols b and d); Semi annual (cols a, c, e, f and g only)- Template EU CQ4 - Quality of non-performing exposures by geography. Note column (b) and (d) are not applicable, because AIB Group plc's NPL ratio is lower than 5%.
		Annual & threshold based (cols b and d); Semi annual (cols a, c, e and f) - Template EU CQ5 - Credit quality of loans and advances by industry. Note column (b) and (d) are not applicable, because AIB Group plc's NPL ratio is lower than 5%.
		Not applicable. Annual & threshold - Template EU CQ6 - Collateral valuation - loans and advances. AIB Group plc's NPL ratio is lower than 5%.
		Semi annual - Template EU CQ7 - Collateral obtained by taking possession and execution processes.
		Not applicable. Annual & threshold - Template EU CQ8 - Collateral obtained by taking possession and execution processes – vintage breakdown. AIB Group plc's NPL ratio is lower than 5%.
Article 442(d)	(d) an ageing analysis of accounting past due exposures;	Annual - Template EU CQ3 - Credit quality of performing and non- performing exposures by past due days.
Article 442(e)	(e) the gross carrying amounts of both defaulted and non-defaulted exposures, the accumulated specific and general credit risk	Semi-annual - Template EU CR1 - Performing and non-performing exposures and related provisions.
	adjustments, the accumulated write-offs taken against those exposures and the net carrying amounts and their distribution by geographical area and industry type and for loans, debt securities and off- balance-sheet exposures;	Annual & threshold based (columns b and d); Semi-annual (columns a, c, e, f and g only) - Template EU CQ4 - Quality of non-performing exposures by geography. Note column (b) and (d) are not applicable as AIB Group plc's NPL ratio is lower than 5%.
		Annual & threshold based (columns b and d); Semi annual (columns a, c, e and f) - Template EU CQ5 - Credit quality of loans and advances by industry. Note column (b) and (d) are not applicable as AIB Group plc's NPL ratio is lower than 5%.
Article 442(f)	(f) any changes in the gross amount of defaulted on- and off-balance- sheet exposures, including, as a minimum, information on the opening and closing balances of those exposures, the gross amount of any of those exposures reverted to non-defaulted status or subject to a write-off;	Semi annual - Template EU CR2 - Changes in the stock of non- performing loans and advances, ( Note at year end if publishing EU CR2-a, AIB will not publish EU CR2); Note due to AIB Group plc NPL ratio lower than 5% AIB published Template EU CR2.
		Not applicable. Annual & threshold - Template EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries. AIB Group plc's NPL ratio is lower than 5%.
Article 442(g)	(g) the breakdown of loans and debt securities by residual maturity.	Semi annual - Template EU CR1-A - Maturity of exposures.
Article 443	Article 443 Disclosure of encumbered and unencumbered assets	, , , , , , , , , , , , , , , , , , , ,
	The state of the s	1

Article 443	Institutions shall disclose information concerning their encumbered and unencumbered assets. For those purposes, institutions shall use the carrying amount per exposure class broken down by asset quality and the total amount of the carrying amount that is encumbered and unencumbered. Disclosure of information on encumbered and unencumbered assets shall not reveal emergency liquidity assistance	Annual - Template EU AE1 - Encumbered and unencumbered assets.  Annual - Template EU AE2 - Collateral received and own debt securities issued.  Annual - Template EU AE3 - Sources of encumbrance.
	provided by central banks.	·
Article 444	Article 444 Disclosure of the use of the Standardised Approach	Annual - Table EU AE4 - Accompanying narrative information.
Article 444	Institutions calculating their risk-weighted exposure amounts in	See below for applicable disclosure requirements.
	accordance with Chapter 2 of Title II of Part Three shall disclose the following information for each of the exposure classes set out in Article 112:	
Article 444(a)	(a) the names of the nominated ECAIs and ECAs and the reasons for any changes in those nominations over the disclosure period;	Annual - Table EU CRD – Qualitative disclosure requirements related to standardised approach.
Article 444(b)	(b) the exposure classes for which each ECAI or ECA is used;	Annual - Table EU CRD – Qualitative disclosure requirements related to standardised approach.
Article 444(c)	(c) a description of the process used to transfer the issuer and issue credit ratings onto items not included in the trading book;	Annual - Table EU CRD – Qualitative disclosure requirements related to standardised approach.
Article 444(d)	(d) the association of the external rating of each nominated ECAI or ECA with the risk weights that correspond to the credit quality steps as set out in Chapter 2 of Title II of Part Three, taking into account that it is not necessary to disclose that information where the institutions comply with the standard association published by EBA;	Annual - Table EU CRD — Qualitative disclosure requirements related to standardised approach.
Article 444(e)	(e) the exposure values and the exposure values after credit risk mitigation associated with each credit quality step as set out in Chapter 2 of Title II of Part Three, by exposure class, as well as the	Semi annual - Template EU CR4 – standardised approach - Credit risk exposure and CRM effects.
	exposure values deducted from own funds.	Semi annual - Template EU CR5 – standardised approach.
		Semi annual - Template EU CCR3 – standardised approach - CCR exposures by regulatory exposure class and risk weights.
Article 445	Article 445 Disclosure of exposure to market risk	
Article 445	Institutions calculating their own funds requirements in accordance with points (b) and (c) of Article 92(3) shall disclose those requirements separately for each risk referred to in those points. In addition, own funds requirements for the specific interest rate risk of securitisation positions shall be disclosed separately.	Semi annual - Template EU MR1 – Market risk under the standardised approach.
Article 446	Article 446 Disclosure of operational risk management	
Article 446	Institutions shall disclose the following information about their operational risk management:	Annual - Table EU ORA - Qualitative information on operational risk.  Annual - Template EU OR1 - Operational risk own funds
		requirements and risk-weighted exposure amounts.
Article 446(a)	(a) the approaches for the assessment of own funds requirements for operation risk that the institution qualifies for;	Annual - Table EU ORA - Qualitative information on operational risk.
	operation risk that the institution qualifies (o),	Annual - Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts.
Article 446(b)	(b) where the institution makes use of it, a description of the methodology set out in Article 312(2), which shall include a discussion of the relevant internal and external factors being considered in the institution's advanced measurement approach;	Not applicable. AIB does not have approval for advanced measurement approach. AIB Group uses the Standardised Approach (TSA) to assess the minimum own fund requirements. This would impact the following two disclosures if it were applicable to AIB:
		Annual - Table EU ORA - Qualitative information on operational risk.
		Annual - Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts.
Article 446(c)	(c) in the case of partial use, the scope and coverage of the different methodologies used.	Not applicable. AIB does not have approval to combine different approaches. AIB Group uses the Standardised Approach (TSA) to assess the minimum own fund requirements. This would impact the following two disclosures if it were applicable to AIB:
		Annual - Table EU ORA - Qualitative information on operational risk.
		Annual - Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts.
Article 447	Article 447 Disclosure of key metrics	
Article 447	Institutions shall disclose the following key metrics in a tabular format:  (a) the composition of their own funds and their own funds	See below for applicable disclosure requirements.
Article 447(a)	requirements as calculated in accordance with Article 92;	Quarterly - Template EU KM1 – Key metrics template.
Article 447(b)	(b) the total risk exposure amount as calculated in accordance with Article 92(3);	Quarterly - Template EU KM1 – Key metrics template.
Article 447(c)	(c) where applicable, the amount and composition of additional own funds which the institutions are required to hold in accordance with point (a) of Article 104(1) of Directive 2013/36/EU;	Quarterly - Template EU KM1 – Key metrics template.
Article 447(d)	(d) their combined buffer requirement which the institutions are required to hold in accordance with Chapter 4 of Title VII of Directive 2013/36/EU;	Quarterly - Template EU KM1 – Key metrics template.
Article 447(e)	(e) their leverage ratio and the total exposure measure as calculated in accordance with Article 429;	Quarterly - Template EU KM1 – Key metrics template.
Article 447(f)	(f) the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	Quarterly - Template EU KM1 – Key metrics template.
Article 447(f)(i)	<ul> <li>(i) the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;</li> </ul>	Quarterly - Template EU KM1 — Key metrics template.
Article 447(f)(ii)	(ii) the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Quarterly - Template EU KM1 – Key metrics template.

Article 447(f)(iii)	(iii) the averages of their liquidity outflows, inflows and net liquidity outflows as calculated pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Quarterly - Template EU KM1 – Key metrics template.
Article 447(g)	(g) the following information in relation to their net stable funding requirement as calculated in accordance with Title IV of Part Six:	Quarterly - Template EU KM1 – Key metrics template.
Article 447(g)(i)	(i) the net stable funding ratio at the end of each quarter of the relevant disclosure period;	Quarterly - Template EU KM1 – Key metrics template.
Article 447(g)(ii)	(ii) the available stable funding at the end of each quarter of the relevant disclosure period:	Quarterly - Template EU KM1 – Key metrics template.
Article 447(g)(iii)	(iii) the required stable funding at the end of each quarter of the relevant disclosure period:	Quarterly - Template EU KM1 – Key metrics template.
Article 447(h)	(h) their own funds and eligible liabilities ratios and their components, numerator and denominator, as calculated in accordance with Articles 92a and 92b and broken down at the level of each resolution group, where applicable.	Not applicable AIB is not a G-SII.
Article 448	Article 448 Disclosure of exposures to interest rate risk on positions not held in the trading book	
Article 448(1)	As from 28 June 2021, institutions shall disclose the following quantitative and qualitative information on the risks arising from potential changes in interest rates that affect both the economic value of equity and the net interest income of their non-trading book activities referred to in Article 84 and Article 98(5) of Directive 2013/36/EU:	Semi annual - Template EU IRRBB1 - Interest rate risks of non-trading book activities.  Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(a)	(a) the changes in the economic value of equity calculated under the six supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	Semi annual - Template EU IRRBB1 - Interest rate risks of non-trading book activities.
Article 448(1)(b)	(b) the changes in the net interest income calculated under the two supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	Semi annual - Template EU IRRBB1 - Interest rate risks of non-trading book activities.
Article 448(1)(c)	(c) a description of key modelling and parametric assumptions, other than those referred to in points (b) and (c) of Article 98(5a) of Directive 2013/36/EU used to calculate changes in the economic value of equity and in the net interest income required under points (a) and (b) of this paragraph;	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(d)	(d) an explanation of the significance of the risk measures disclosed under points (a) and (b) of this paragraph and of any significant variations of those risk measures since the previous disclosure	Semi annual - Template EU IRRBB1 - Interest rate risks of non-trading book activities.
	reference date;	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(e)	(e) the description of how institutions define, measure, mitigate and control the interest rate risk of their non-trading book activities for the purposes of the competent authorities' review in accordance with Article 84 of Directive 2013/36/EU, including:	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(e)(i)	(i) a description of the specific risk measures that the institutions use to evaluate changes in their economic value of equity and in their net interest income;	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(e)(ii)	(ii) a description of the key modelling and parametric assumptions used in the institutions' internal measurement systems that would differ from the common modelling and parametric assumptions referred to in Article 98(5a) of Directive 2013/36/EU for the purpose of calculating changes to the economic value of equity and to the net interest income, including the rationale for those differences;	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(e)(iii)	(iii) a description of the interest rate shock scenarios that institutions use to estimate the interest rate risk;	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(e)(iv)	<ul><li>(iv) the recognition of the effect of hedges against those interest rate risks, including internal hedges that meet the requirements laid down in Article 106(3);</li></ul>	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(e)(v)	<ul><li>(v) an outline of how often the evaluation of the interest rate risk occurs;</li></ul>	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(f)	(f) the description of the overall risk management and mitigation strategies for those risks;	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(1)(g)	(g) average and longest repricing maturity assigned to non-maturity deposits.	Annual - Table EU IRRBBA - Qualitative Information on interest rate risks of non-trading book activities.
Article 448(2)	By way of derogation from paragraph 1 of this Article, the requirements set out in points (c) and (e)(i) to (e) (iv) of paragraph 1 of this Article shall not apply to institutions that use the standardised methodology or the simplified standardised methodology referred to in Article 84(1) of Directive 2013/36/EU.	Paragraph 1 is fully complied with, no derogation applicable.
Article 449	Article 449 Disclosure of exposures to securitisation positions	
Article 449	Institutions calculating risk-weighted exposure amounts in accordance with Chapter 5 of Title II of Part Three or own funds requirements in accordance with Article 337 or 338 shall disclose the following information separately for their trading book and non-trading book activities:	See below for applicable disclosure requirements.
Article 449(a)	(a) a description of their securitisation and re-securitisation activities, including their risk management and investment objectives in connection with those activities, their role in securitisation and re-securitisation transactions, whether they use the simple, transparent and standardised securitisation (STS) as defined in point (10) of Article 242, and the extent to which they use securitisation transactions to transfer the credit risk of the securitised exposures to third parties with, where applicable, a separate description of their synthetic securitisation risk transfer policy;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(b)	(b) the type of risks they are exposed to in their securitisation and re- securitisation activities by level of seniority of the relevant securitisation positions providing a distinction between STS and non- STS positions and:	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(b)(i)	(i) the risk retained in own-originated transactions;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
		· · · · · · · · · · · · · · · · · · ·

Article 449(b)(ii)	(ii) the risk incurred in relation to transactions originated by third parties;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(c)	(c) their approaches for calculating the risk-weighted exposure amounts that they apply to their securitisation activities, including the types of securitisation positions to which each approach applies and with a distinction between STS and non-STS positions;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(d)	(d) a list of SSPEs falling into any of the following categories, with a description of their types of exposures to those SSPEs, including derivative contracts:	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(d)(i)	(i) SSPEs which acquire exposures originated by the institutions;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(d)(ii)	(ii) SSPEs sponsored by the institutions;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(d)(iii)	<ul> <li>(iii) SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services;</li> </ul>	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(d)(iv)	(iv) SSPEs included in the institutions' regulatory scope of consolidation;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(e)	(e) a list of any legal entities in relation to which the institutions have disclosed that they have provided support in accordance with Chapter 5 of Title II of Part Three;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(f)	(f) a list of legal entities affiliated with the institutions and that invest in securitisations originated by the institutions or in securitisation positions issued by SSPEs sponsored by the institutions;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(g)	<ul> <li>(g) a summary of their accounting policies for securitisation activity, including where relevant a distinction between securitisation and re- securitisation positions;</li> </ul>	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(h)	(h) the names of the ECAIs used for securitisations and the types of exposure for which each agency is used;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(i)	(i) where applicable, a description of the Internal Assessment Approach as set out in Chapter 5 of Title II of Part Three, including the structure of the internal assessment process and the relation between internal assessment and external ratings of the relevant ECAI disclosed in accordance with point (h), the control mechanisms for the internal assessment process including discussion of independence, accountability, and internal assessment process review, the exposure types to which the internal assessment process is applied and the stress factors used for determining credit enhancement levels;	Annual - Table EU SECA - Qualitative disclosure requirements related to securitisation exposures.
Article 449(j)	(j) separately for the trading book and the non-trading book, the carrying amount of securitisation exposures, including information on whether institutions have transferred significant credit risk in accordance with Articles 244 and 245, for which institutions act as originator, sponsor or investor, separately for traditional and synthetic securitisations, and for STS and non-STS transactions and broken down by type of securitisation exposures;	Not Applicable. Semi-annual - Template EU SEC2 - Securitisation
Article 449(k)	(k) for the non-trading book activities, the following information:	See below for applicable disclosure requirements.
Article 449(k)(i)	(i) the aggregate amount of securitisation positions where institutions act as originator or sponsor and the associated risk- weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1 250 %, broken down between traditional and synthetic securitisations and between securitisation and re-securitisation exposures, separately for STS and non-STS positions, and further broken down into a meaningful number of risk-weight or capital requirement bands and by approach used to calculate the capital requirements;	Semi Annual - Template EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor.
Article 449(k)(ii)	(ii) the aggregate amount of securitisation positions where institutions act as investor and the associated risk- weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1 250 %, broken down between traditional and synthetic securitisations, securitisation and re-securitisation positions, and STS and non-STS positions, and further broken down into a meaningful number of risk weight or capital requirement bands and by approach used to calculate the capital requirements;	Semi annual - Template EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor.
Article 449(I)	(I) for exposures securitised by the institution, the amount of exposures in default and the amount of the specific credit risk adjustments made by the institution during the current period, both broken down by exposure type.	This paragraph requires the following template to be disclosed: Template EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments  Not applicable. AIB does not have exposures securitised that are in default or have specific credit risk adjustments.
Article 449a	Article 449a Disclosure of environmental, social and governance risks (ESG risks)	
	1.	

Article 449a	1. From 28 June 2022, large institutions which have issued securities that are admitted to trading on a regulated market of any Member State, as defined in point (21) of Article 4(1) of Directive 2014/65/EU,	Semi-annual - Table 1 - Qualitative information on Environmental risk.
	shall disclose information on ESG risks, including physical risks and transition risks, as defined in the report referred to in Article 98(8) of	Semi-annual - Table 2 - Qualitative information on Social risk.
	Directive 2013/36/EU.	Semi-annual - Table 3 - Qualitative information on Governance risk.
	The information referred to in the first paragraph shall be disclosed on an annual basis for the first year and biannually thereafter.	Semi-annual - Template 1 - Banking book- Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity.
	EBA shall develop draft implementing technical standards to specify uniform disclosure formats, as laid down in Article 434a, for ESG risks ensuring that they are consistent with and uphold the principle of proportionality while avoiding duplication of disclosure requirements.	Semi-annual - Template 2 - Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral.
	already established in other applicable Union law. Those formats shall not require disclosure of information beyond the information to be reported to competent authorities in accordance with Article 430(1), point (h), and shall in particular take into account the size and	Semi-annual - Template 3 - Banking book - Indicators of potential climate change transition risk: Alignment metrics.
	complexity of the institution and the relative exposure of small and non-complex institutions subject to Article 433b to ESG risks.  Power is conferred on the Commission to adopt the implementing	Semi-annual - Template 4 - Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms.
	technical standards referred to in the first subparagraph of this paragraph in accordance with Article 15 of Regulation (EU) No 1093/2010.	Semi-annual - Template 5 - Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk.
		Semi-annual - Template 6 - Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures.
		Semi-annual - Template 7 - Mitigating actions: Assets for the calculation of GAR.
		Semi-annual - Template 8 - GAR %.
		Semi-annual - Template 9 - Mitigating Actions: BTAR (Not applicable - voluntary disclosure and decision taken not to submit given the significant data requirements needed)
		Semi-annual - Template 10 - Other climate change mitigating actions that are not covered in Regulation (EU) 2020/852.
Article 450	Article 450 Disclosure of remuneration policy	
Article 450(1)	Institutions shall disclose the following information regarding their remuneration policy and practices for those categories of staff whose professional activities have a material impact on the risk profile of the institutions:	See below for applicable disclosure requirements.
Article 450(1)(a)	(a) information concerning the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year, including, where applicable, information about the composition and the mandate of a remuneration committee, the external consultant whose services have been used for the determination of the remuneration policy and the role of the relevant stakeholders:	Annual - Table EU REMA - Remuneration policy.
Article 450(1)(b)	(b) information about the link between pay of the staff and their performance:	Annual - Table EU REMA - Remuneration policy.
Article 450(1)(c)	(c) the most important design characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria;	Annual - Table EU REMA - Remuneration policy.
Article 450(1)(d)	(d) the ratios between fixed and variable remuneration set in accordance with point (g) of Article 94(1) of Directive 2013/36/EU;	Annual - Table EU REMA - Remuneration policy.
Article 450(1)(e)		Annual - Table EU REMA - Remuneration policy.
Article 450(1)(f)	(f) the main parameters and rationale for any variable component scheme and any other non-cash benefits;	Annual - Table EU REMA - Remuneration policy.
Article 450(1)(g)	(g) aggregate quantitative information on remuneration, broken down by business area;	Annual - Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff).
Article 450(1)(h)	(h) aggregate quantitative information on remuneration, broken down by senior management and members of staff whose professional activities have a material impact on the risk profile of the institutions, indicating the following:	See below for applicable disclosure requirements.
Article 450(1)(h)(i)	<ul> <li>the amounts of remuneration awarded for the financial year, split into fixed remuneration including a description of the fixed components, and variable remuneration, and the number of beneficiaries;</li> </ul>	Annual - Template EU REM1 - Remuneration awarded for the financial year.
Article 450(1)(h)(ii)	(ii) the amounts and forms of awarded variable remuneration, split into cash, shares, share-linked instruments and other types separately for the part paid upfront and the deferred part;	Annual - Template EU REM1 - Remuneration awarded for the financial year.
Article 450(1)(h)(iii)	(iii) the amounts of deferred remuneration awarded for previous performance periods, split into the amount due to vest in the financial year and the amount due to vest in subsequent years;	Annual - Template EU REM3 - Deferred remuneration.
Article 450(1)(h)(iv)	<ul><li>(iv) the amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments;</li></ul>	Annual - Template EU REM3 - Deferred remuneration.
Article 450(1)(h)(v)	(v) the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those awards;	Annual - Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff).
Article 450(1)(h)(vi)	(vi) the severance payments awarded in previous periods, that have been paid out during the financial year;	Annual - Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff).
Article 450(1)(h)(vii)	<ul> <li>(vii) the amounts of severance payments awarded during the financial year, split into paid upfront and deferred, the number of beneficiaries of those payments and highest payment that has been awarded to a single person;</li> </ul>	Annual - Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff).

Article 450(1)(i)	(i) the number of individuals that have been remunerated EUR 1 million or more per financial year, with the remuneration between EUR 1 million and EUR 5 million broken down into pay bands of EUR 500 000 and with the remuneration of EUR 5 million and above broken down into pay bands of EUR 1 million;	Annual - Template EU REM4 - Remuneration of 1 million EUR or more per year.
Article 450(1)(j)	(j) upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management;	Annual - Not applicable. AIB will disclose relevant information on request.
Article 450(1)(k)	(k) information on whether the institution benefits from a derogation laid down in Article 94(3) of Directive 2013/36/EU.	Annual - Table EU REMA - Remuneration policy.
	For the purposes of point (k) of the first subparagraph of this paragraph, institutions that benefit from such a derogation shall indicate whether they benefit from that derogation on the basis of point (a) or (b) of Article 94(3) of Directive 2013/36/EU. They shall also indicate for which of the remuneration principles they apply the derogation(s), the number of staff members that benefit from the derogation(s) and their total remuneration, split into fixed and variable remuneration.	
Article 450(2)	For large institutions, the quantitative information on the remuneration of institutions' collective management body referred to in this Article shall also be made available to the public, differentiating between executive and non-executive members.	Annual - Table EU REMA - Remuneration policy.
	Institutions shall comply with the requirements set out in this Article in a manner that is appropriate to their size, internal organisation and the nature, scope and complexity of their activities and without prejudice to Regulation (EU) 2016/679 of the European Parliament and of the Council (*).	
Article 451	Article 451 Disclosure of the leverage ratio	
Article 451(1)	Institutions that are subject to Part Seven shall disclose the following information regarding their leverage ratio as calculated in accordance with Article 429 and their management of the risk of excessive leverage:	See below for applicable disclosure requirements.
Article 451(1) (a)	(a) the leverage ratio and how the institutions apply Article 499(2);	Annual (for rows 28 to 31a), Semi annual (for rows up to row 28) - Template EU LR2 - LRCom: Leverage ratio common disclosure.
Article 451(1)(b)	(b) a breakdown of the total exposure measure referred to in Article 429(4), as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements;	Semi annual - Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposure.
	the relevant miorination disclosed in published miantal statements,	Annual (for rows 28 to 31a), Semi annual (for rows up to row 28) - Template EU LR2 - LRCom: Leverage ratio common disclosure.
		Semi annual - Template EU LR3 - LRSpl: Split-up of on-balance sheet exposures (excluding derivatives, SFTs and exempted exposures).
Article 451(1)(c)	(c) where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a(1) and the adjusted leverage ratio calculated in accordance with Article 429a(7);	Annual (for rows 28 to 31a), Semi annual (for rows up to row 28) - Template EU LR2 - LRCom: Leverage ratio common disclosure.
Article 451(1)(d)	(d) a description of the processes used to manage the risk of excessive leverage;	Annual - Table EU LRA: Free format text boxes for disclosure on qualitative items.
Article 451(1)(e)	(e) a description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.	Annual - Table EU LRA: Free format text boxes for disclosure on qualitative items.
Article 451(2)	Public development credit institutions as defined in Article 429a(2) shall disclose the leverage ratio without the adjustment to the total exposure measure determined in accordance with point (d) of the first subparagraph of Article 429a(1).	Not applicable. AIB is not a public development credit institutions. This would impact the following table if it were applicable to AIB: Template EU LR2 - LRCom: Leverage ratio common disclosure.
Article 451(3)	In addition to points (a) and (b) of paragraph 1 of this Article, large institutions shall disclose the leverage ratio and the breakdown of the total exposure measure referred to in Article 429(4) based on averages calculated in accordance with the implementing act referred to in Article 430(7).	Annual (for rows 28 to 31a), Semi annual (for rows up to row 28) - Template EU LR2 - LRCom: Leverage ratio common disclosure.
Article 451a	Article 451a Disclosure of liquidity requirements	
Article 451a(1)	Institutions that are subject to Part Six shall disclose information on their liquidity coverage ratio, net stable funding ratio and liquidity risk management in accordance with this Article.	See below for applicable disclosure requirements.
Article 451a(2)	Institutions shall disclose the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	Quarterly - Template EU LIQ1 - Quantitative information of LCR.  Quarterly - Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1.
Article 451a(2) point (a)	(a) the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Quarterly - Template EU LIQ1 - Quantitative information of LCR.  Quarterly - Table EU LIQ8 on qualitative information on LCR, which complements template EU LIQ1.
Article 451a(2) point (b)	(b) the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer;	Quarterly - Template EU LIQ1 - Quantitative information of LCR.  Quarterly - Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1.
Article 451a(2) point (c)	(c) the averages of their liquidity outflows, inflows and net liquidity outflows as calculated in accordance with the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.	Quarterly - Template EU LIQ1 - Quantitative information of LCR.  Quarterly - Table EU LIQ8 on qualitative information on LCR, which complements template EU LIQ1.
Article 451a(3)	Institutions shall disclose the following information in relation to their net stable funding ratio as calculated in accordance with Title IV of Part Six:	Semi annual - Template EU LIQ2 - Net Stable Funding Ratio.
Article 451a(3)(a)	(a) quarter-end figures of their net stable funding ratio calculated in accordance with Chapter 2 of Title IV of Part Six for each quarter of	Semi annual - Template EU LIQ2 - Net Stable Funding Ratio.
	the relevant disclosure period;	
Article 451a(3)(b)		Semi annual - Template EU LIQ2 - Net Stable Funding Ratio.

Article 451a(4)	Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk in accordance with Article 86 of Directive 2013/36/EU.	Annual - Table EU LIQA - Liquidity risk management.
	TITLE III QUALIFYING REQUIREMENTS FOR THE USE OF PARTICULAR INSTRUMENTS OR METHODOLOGIES	
Article 452	Article 452 Disclosure of the use of the IRB Approach to credit risk	
Article 452	Institutions calculating the risk-weighted exposure amounts under the IRB Approach to credit risk shall disclose the following information:	See below for applicable disclosure requirements.
Article 452(a)	(a) the competent authority's permission of the approach or approved transition;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(b)	(b) for each exposure class referred to in Article 147, the percentage of the total exposure value of each exposure class subject to the Standardised Approach laid down in Chapter 2 of Title II of Part Three or to the IRB Approach laid down in Chapter 3 of Title II of Part Three, as well as the part of each exposure class subject to a roll-out plan; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, they shall disclose separately the percentage of the total exposure value of each exposure class subject to that permission;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.  Annual - Template EU CR6-A – Scope of the use of IRB and SA approaches.
Article 452(c)	(c) the control mechanisms for rating systems at the different stages of model development, controls and changes, which shall include information on:	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(c)(i)	(i) the relationship between the risk management function and the internal audit function;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(c)(ii)	(ii) the rating system review;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(c)(iii)	<ul> <li>(iii) the procedure to ensure the independence of the function in charge of reviewing the models from the functions responsible for the development of the models;</li> </ul>	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(c)(iv)	<ul><li>(iv) the procedure to ensure the accountability of the functions in charge of developing and reviewing the models;</li></ul>	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(d)	(d) the role of the functions involved in the development, approval and subsequent changes of the credit risk models;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(e)	(e) the scope and main content of the reporting related to credit risk models;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(f)	(f) a description of the internal ratings process by exposure class, including the number of key models used with respect to each portfolio and a brief discussion of the main differences between the models within the same portfolio, covering:	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(f)(i)	<ul> <li>(i) the definitions, methods and data for estimation and validation of PD, which shall include information on how PDs are estimated for low default portfolios, whether there are regulatory floors and the drivers for differences observed between PD and actual default rates at least for the last three periods;</li> </ul>	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(f)(ii)	<ul> <li>(ii) where applicable, the definitions, methods and data for estimation and validation of LGD, such as methods to calculate downturn LGD, how LGDs are estimated for low default portfolio and the time lapse between the default event and the closure of the exposure;</li> </ul>	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(f)(iii)	(iii) where applicable, the definitions, methods and data for estimation and validation of conversion factors, including assumptions employed in the derivation of those variables;	Annual - Table EU CRE – Qualitative disclosure requirements related to IRB approach.
Article 452(g)	(g) as applicable, the following information in relation to each exposure class referred to in Article 147:	Semi annual - Template EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range.
Article 452(g)(i)	(i) their gross on-balance-sheet exposure;	Semi annual - Template EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range.
Article 452(g)(ii)	<ul><li>(ii) their off-balance-sheet exposure values prior to the relevant conversion factor;</li></ul>	Semi annual - Template EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range.
Article 452(g)(iii)	(iii) their exposure after applying the relevant conversion factor and credit risk mitigation;	Semi annual - Template EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range.
Article 452(g)(iv)	<ul><li>(iv) any model, parameter or input relevant for the understanding of the risk weighting and the resulting risk exposure amounts disclosed across a sufficient number of obligor grades (including default) to allow for a meaningful differentiation of credit risk;</li></ul>	Semi annual - Template EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range.
Article 452(g)(v)	(v) separately for those exposure classes in relation to which institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, and for exposures for which the institutions do not use such estimates, the values referred to in points (i) to (iv) subject to that permission;	Semi annual - Template EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range.
Article 452(h)	(h) institutions' estimates of PDs against the actual default rate for each exposure class over a longer period, with separate disclosure of the PD range, the external rating equivalent, the weighted average and arithmetic average PD, the number of obligors at the end of the previous year and of the year under review, the number of defaulted obligors, including the new defaulted obligors, and the annual average historical default rate.	Annual - Template EU CR9 – IRB approach – Backtesting of PD per exposure class (fixed PD scale).
Article 452(h)	For the purposes of point (b) of this Article, institutions shall use the exposure value as defined in Article 166.	Annual - Template EU CR9 – IRB approach – Backtesting of PD per exposure class (fixed PD scale).
Article 453	Article 453 Disclosure of the use of credit risk mitigation techniques	
Article 453	Institutions using credit risk mitigation techniques shall disclose the following information:	See below for applicable disclosure requirements.
Article 453(a)	(a) the core features of the policies and processes for on- and off- balance-sheet netting and an indication of the extent to which institutions make use of balance sheet netting;	Annual - Table EU CRC – Qualitative disclosure requirements related to CRM techniques.
Article 453(b)	(b) the core features of the policies and processes for eligible collateral evaluation and management;	Annual - Table EU CRC – Qualitative disclosure requirements related to CRM techniques.
Article 453(c)	(c) a description of the main types of collateral taken by the institution to mitigate credit risk;	Annual - Table EU CRC – Qualitative disclosure requirements related to CRM techniques.

Article 453(d)	(d) for guarantees and credit derivatives used as credit protection, the main types of guarantor and credit derivative counterparty and their creditworthiness used for the purpose of reducing capital requirements, excluding those used as part of synthetic securitisation structures;	Annual - Table EU CRC – Qualitative disclosure requirements related to CRM techniques.
Article 453(e)	(e) information about market or credit risk concentrations within the credit risk mitigation taken;	Annual - Table EU CRC — Qualitative disclosure requirements related to CRM techniques.
Article 453(f)	(f) for institutions calculating risk-weighted exposure amounts under the Standardised Approach or the IRB Approach, the total exposure value not covered by any eligible credit protection and the total exposure value covered by eligible credit protection after applying volatility adjustments; the disclosure set out in this point shall be made separately for loans and debt securities and including a breakdown of defaulted exposures;	Semi annual - Template EU CR3 - CRM techniques overview: Disclosure of the use of credit risk mitigation techniques.
Article 453(g)	(g) the corresponding conversion factor and the credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effect;	Semi annual - Template EU CR4 – standardised approach - Credit risk exposure and CRM effects.  Semi annual - Template EU CR7-A – IRB approach – Disclosure of the
		extent of the use of CRM techniques.
Article 453(h)	(h) for institutions calculating risk-weighted exposure amounts under the Standardised Approach, the on- and off-balance-sheet exposure value by exposure class before and after the application of conversion factors and any associated credit risk mitigation;	Semi annual - Template EU CR4 – standardised approach - Credit risk exposure and CRM effects.
Article 453(i)	(i) for institutions calculating risk-weighted exposure amounts under the Standardised Approach, the risk-weighted exposure amount and the ratio between that risk-weighted exposure amount and the exposure value after applying the corresponding conversion factor and the credit risk mitigation associated with the exposure; the disclosure set out in this point shall be made separately for each exposure class;	Semi annual - Template EU CR4 – standardised approach - Credit risk exposure and CRM effects.
Article 453(j)	(j) for institutions calculating risk-weighted exposure amounts under the IRB Approach, the risk-weighted exposure amount before and after recognition of the credit risk mitigation impact of credit derivatives; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk- weighted exposure amounts, they shall make the disclosure set out in this point separately for the exposure classes subject to that permission.	Semi annual - Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques.
Article 454	Article 454 Disclosure of the use of the Advanced Measurement Approaches to operational risk	
Article 454	The institutions using the Advanced Measurement Approaches set out in Articles 321 to 324 for the calculation of their own funds requirements for operational risk shall disclose a description of their use of insurance and other risk-transfer mechanisms for the purpose of mitigating that risk.	Annual - Table EU ORA - Qualitative information on operational risk.  Annual - Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts.
Article 455	Article 455 Use of internal market risk models	Not applicable. All market risk is treated under standardised
Article 455	Institutions calculating their capital requirements in accordance with	approach.  Not applicable. All market risk is treated under standardised
Article 455(a)	Article 363 shall disclose the following information:  (a) for each sub-portfolio covered:	approach.  Not Applicable. Annual Template EU MRB Qualitative disclosure requirements for institutions using the internal Market Risk Models. All market risk is treated under standardised approach.
Article 455(a)(i)	(i) the characteristics of the models used;	Not applicable. All market risk is treated under standardised approach.
Article 455(a)(ii)	(ii) where applicable, for the internal models for incremental default and migration risk and for correlation trading, the methodologies used and the risks measured through the use of an internal model including a description of the approach used by the institution to determine liquidity horizons, the methodologies used to achieve a capital assessment that is consistent with the required soundness standard and the approaches used in the validation of the model;	Not applicable. All market risk is treated under standardised approach.
Article 455(a)(iii)	(iii) a description of stress testing applied to the sub-portfolio;	Not applicable. All market risk is treated under standardised approach.
Article 455(a)(iv)	(iv) a description of the approaches used for back-testing and validating the accuracy and consistency of the internal models and modelling processes;	Not applicable. All market risk is treated under standardised approach.
Article 455(b)	(b) the scope of permission by the competent authority;	Not Applicable. Annual Template EU MRB Qualitative disclosure requirements for institutions using the internal Market Risk Models. All market risk is treated under standardised approach.
Article 455(c)	(c) a description of the extent and methodologies for compliance with the requirements set out in Articles 104 and 105;	Not Applicable. Annual Template EU MRB Qualitative disclosure requirements for institutions using the internal Market Risk Models. All market risk is treated under standardised approach.
Article 455(d)	(d) the highest, the lowest and the mean of the following:	Not applicable. Semi annual - Template EU MR3 IMA values for trading portfolios. All market risk is treated under standardised approach.
Article 455(d)(i)	<ul> <li>(i) the daily value-at-risk measures over the reporting period and at the end of the reporting period;</li> </ul>	Not applicable. All market risk is treated under standardised approach.
Article 455(d)(ii)	<ul><li>(ii) the stressed value-at-risk measures over the reporting period and at the end of the reporting period;</li></ul>	Not applicable. All market risk is treated under standardised approach.
Article 455(d)(iii)	(iii) the risk numbers for incremental default and migration risk and for the specific risk of the correlation trading portfolio over the reporting period and at the end of the reporting period;	Not applicable. All market risk is treated under standardised approach.
Article 455(e)	(e) the elements of the own funds requirement as specified in Article 364;	Not applicable. Semi annual - Template EU MR2–A Market risk under the Internal Model Approach (IMA). All market risk is treated under standardised approach.
Article 455(f)	<ul> <li>(f) the weighted average liquidity horizon for each sub-portfolio covered by the internal models for incremental default and migration risk and for correlation trading;</li> </ul>	Not Applicable. Annual Template EU MRB Qualitative disclosure requirements for institutions using the internal Market Risk Models. All market risk is treated under standardised approach.
Article 455(g)	(g) a comparison of the daily end-of-day value-at-risk measures to the one-day changes of the portfolio's value by the end of the subsequent business day together with an analysis of any important overshooting	Not applicable. Semi annual - Template EU MR4 Comparison of VaR estimates with gains/losses. All market risk is treated under standardised approach.

CRR 468	Temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in view of the COVID-19 pandemic	Quarterly - Table IFRS 9/Article 468-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, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR.  The Group is not applying the temporary treatment specified in Article 468. Own funds, capital and leverage ratios reflect the full impact of unrealised gains and losses measured at fair value through other comprehensive income. Note this derogation ended on the 31 December 2022.
CRR 473a (8)	Introduction to IFRS 9	Quarterly - Table IFRS 9/Article 468-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, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR.  AIB Group no longer applies the IFRS9 transitional capital arrangements from June 2024. See above template for details. Note the static transitional scaling factor ended on 31 December 2022. The dynamic transitional scaling factor per Regulation (EU) 2020/873 ended on 31 December 2024.
Bank Recovery and Resolution Directive (BRRD) 2014/59/EU Article 45i (3)	Minimum requirement for own funds and eligible liabilities. Supervisory public disclosure of the requirement	
Article 45i(3)	Entities referred to in paragraph 1 shall make the following information publicly available on at least an annual basis:	
Article 45i(3)(a)	(a) the amounts of own funds that, where applicable, meet the conditions of point (b) of Article 45f(2) and eligible liabilities;	Semi Annual - Template EU KM2: key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities.
Article 45i(3)(b)	(b) the composition of the items referred to in point (a), including their maturity profile and ranking in normal insolvency proceedings;	Annual - Template EU TLAC1 - Composition - MREL and, where applicable, the G-SII Requirement for own funds and eligible liabilities.  Annual - Template EU TLAC3b: creditor ranking - resolution entity.
Article 45i(3)(c)	(c) the applicable requirement referred to in Article 45e or Article 45f expressed in accordance with Article 45(2).	Semi Annual - Template EU KM2: key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities.  Annual - Template EU TLAC1 - Composition - MREL and, where applicable, the G-SII Requirement for own funds and eligible liabilities.