
Pillar 3

Report 2023

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Notes to the reader

This document presents DLL's consolidated Capital Adequacy and Risk Management report (hereafter referred to as Pillar 3) for the period ending December 31, 2023.

De Lage Landen International B.V. (DLL) is a global provider of asset-based financial solutions working across 9 key industries: Agriculture, Food, Healthcare, Energy transition, Construction, Transportation, Industrial equipment, Office equipment and Technology. DLL is present in over 25 countries and operates via a Vendor Finance model, where DLL enters into partnerships with global manufacturers offering integrated solutions to their customers for the entire asset life cycle.

DLL is a credit institution under the Capital Requirements Regulation (CRR) and is a 100% subsidiary of the Coöperatieve Rabobank U.A. (Rabobank). DLL operates through local legal entities, which may conduct business using local licenses and under supervision of local regulators (e.g., DLL Finans AB in Sweden and Banco De Lage Landen Brasil S.A. in Brasil). For (part of) the business in Germany, Italy, Spain and Portugal, business is executed in branches of DLL where the passporting rights of DLL are leveraged. DLL holds 100% of the shares of its subsidiaries, except for "joint ventures," where DLL still controls the entities by having a majority in voting rights and economic interest.

DLL is a subsidiary institution that holds financial institutions in third countries. Therefore DLL applies the requirements laid down in Articles 89, 90 and 91 and Parts Three, Four and Seven and the associated reporting requirements laid down in Part Seven A on the basis of its sub-consolidated situation. DLL classifies as large subsidiary of an EU parent institution and therefore has to comply with the disclosure requirements explained in article 13 paragraph 1 of the CRR on a sub-consolidated basis. The information in Pillar 3 has not been audited by DLL's independent external auditors. However, the Pillar 3 disclosures are subject to DLL's internal controls and validation mechanisms to provide assurance over the information disclosed in this report as well as with regards to compliance with laws and regulations.

This report is based on the templates prescribed by Commission Implementing Regulation (EU) 2021/637 of March 15, 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. Consequently, not all tables can be reconciled to the Annual Report or other tables in this Pillar 3 report.

Key metrics and risk-weighted exposure

EU KM1 – Key metrics template

Key metrics			
<i>Amounts in millions of euros</i>	2023-12	2023-06	2022-12¹
Available own funds (amounts)			
Common Equity Tier 1 (CET1) capital	3,729	3,735	3,494
Tier 1 capital	3,729	3,735	3,494
Total capital	3,729	3,735	3,506
Risk-weighted exposure amounts			
Total risk-weighted exposure amount	31,647	29,434	28,002
Capital ratios (as a percentage of risk-weighted exposure amount)			
Common Equity Tier 1 ratio (%)	11.78%	12.69%	12.48%
Tier 1 ratio (%)	11.78%	12.69%	12.48%
Total capital ratio (%)	11.78%	12.69%	12.52%
Additional own funds requirements based on SREP			
Additional CET1 SREP requirements (%)	0.00%	0.00%	0.00%
Additional AT1 SREP requirements (%)	0.00%	0.00%	0.00%
Additional T2 SREP requirements (%)	0.00%	0.00%	0.00%
Total SREP own funds requirements (%)	8.00%	8.00%	8.00%
Combined buffer requirement			
Capital conservation buffer (%)	2.50%	2.50%	2.50%
Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%
Institution specific countercyclical capital buffer (%)	0.49%	0.48%	0.05%
Systemic risk buffer (%)			
Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
Other Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
Combined buffer requirement (%)	2.99%	2.98%	2.55%
Overall capital requirements (%)	10.99%	10.98%	10.55%
CET1 available after meeting the total SREP own funds requirements (%)	3.78%	4.69%	4.52%

¹ 2022-12 Total risk-weighted exposure amount has changed during 2023 due to a resubmission. Also related ratios have changed

Key metrics			
<i>Amounts in millions of euros</i>	2023-12	2023-06	2022-12
Leverage ratio			
Leverage ratio total exposure measure	48,750	46,496	44,840
Leverage ratio (%)	7.65%	8.03%	7.79%
Own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)			
Additional CET1 leverage ratio requirements (%)	0.00%	0.00%	0.00%
Additional AT1 leverage ratio requirements (%)	0.00%	0.00%	0.00%
Additional T2 leverage ratio requirements (%)	0.00%	0.00%	0.00%
Total SREP leverage ratio requirements (%)	0.00%	0.00%	0.00%
Applicable leverage buffer (%)	0.00%	0.00%	0.00%
Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%
Liquidity Coverage Ratio			
Total high-quality liquid assets (HQLA) (Weighted value-average)			
Cash outflows - Total weighted value			
Cash inflows - Total weighted value			
Total net cash outflows (adjusted value)			
Liquidity coverage ratio (%)			
Net Stable Funding Ratio			
Total available stable funding			
Total required stable funding			
NSFR ratio (%)			

Liquidity Coverage Ratio and Net Stable Funding Ratio requirements are not applicable to DLL and therefore also not reported in the table above.

On December 31, 2023, our CET1 ratio amounted to 11.78%. During 2022, DLL successfully delivered and received ECB approval for a model Return to Compliance (RtC) plan. This plan entails a self-imposed RWA add-on which is updated every quarter. The risk-weighted exposure amount (RWEA) add-on for December 2023 equals EUR 5,491 million. The growth of our business in 2023 led to a further growth of DLL's RWEA, whereas addition of the 2022 net profits increased the capital position. Due to these developments, the total capital ratio decreased to 11.78%. DLL has not yet included the 2023 profits in the capital.

EU OVC – ICAAP information

The Executive Board of DLL is responsible for DLL's capital management within the framework as set by its parent, Rabobank. It is the responsibility of the Executive Board to manage physical capital levels to ensure sufficient capital is held to meet (regulated) requirements and to assure mid- and long-term continuity. Capital requirements are managed actively through DLL's risk strategy, risk appetite and balance sheet management.

In the yearly Internal Capital Adequacy Assessment Process (ICAAP), DLL assesses the capital adequacy in the context of the current and foreseeable business environment in which it operates and the associated risk exposures as part of the Supervisory Review and Evaluation Process (SREP).

EU OV1 – Overview of risk-weighted exposure amounts

Overview of risk-weighted exposure amounts			
Amounts in millions of euros	Risk-weighted exposure amounts (RWEAs)		Total own funds requirements
	2023-12	2022-12	2023-12
Credit risk (excluding CCR)	28,222	19,696	2,258
Of which the standardized approach	6,588	5,677	527
Of which the foundation IRB (FIRB) approach	-	-	-
Of which slotting approach	-	-	-
Of which equities under the simple risk-weighted approach	-	-	-
Of which the advanced IRB (AIRB) approach	21,635	14,019	1,731
Counterparty credit risk - CCR	122	165	10
Of which the (simplified) standardized approach	122	165	10
Of which internal model method (IMM)	-	-	-
Of which exposures to a CCP	-	-	-
Of which credit valuation adjustment - CVA	-	-	-
Of which mark to market method	-	-	-
Settlement risk	-	-	-
Securitization exposures in the non-trading book (after the cap)	-	-	-
Of which SEC-IRBA approach	-	-	-
Of which SEC-ERBA (including IAA)	-	-	-
Of which SEC-SA approach	-	-	-
Of which 1250%/deduction	-	-	-
Market risk	-	-	-
Of which the standardized approach	-	-	-
Of which IMA	-	-	-
Large exposures	-	-	-
Operational risk	3,168	2,973	253
Of which basic indicator approach	3,168	2,973	253
Of which standardized approach	-	-	-
Of which advanced measurement approach	-	-	-
Additional risk exposure amount due to Article 3 CRR	135	5,168	11
Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	594	342	48
Total	31,647	28,002	2,532

Own Funds

EU CC1 – Composition of regulatory own funds

Composition of regulatory own funds	
<i>Amounts in millions of euros</i>	2023-12
Capital instruments and the related share premium accounts	1,233
Retained earnings	2,562
Accumulated other comprehensive income (and other reserves)	17
Common Equity Tier 1 (CET1) capital before regulatory adjustments	3,812
Intangible assets (net of related tax liability)	(3)
Deferred tax assets that rely on future profitability	(17)
IRB shortfall of credit risk adjustments to expected losses	(44)
Other regulatory adjustments on CET1 capital	(18)
Total regulatory adjustments to Common Equity Tier 1 (CET1)	(83)
Common Equity Tier 1 (CET1) capital	3,729
Additional Tier 1 (AT1) capital before regulatory adjustments	-
Tier 1 capital (T1 = CET1 + AT1)	3,729
IRB Excess of provisions over expected losses eligible	-
Tier 2 (T2) capital	-
Total capital (TC = T1 + T2)	3,729
Total risk exposure amount	31,647

Composition of regulatory own funds

Amounts in millions of euros **2023-12**

Capital ratios and requirements including buffers

Common Equity Tier 1 ratio	11.78%
Tier 1 ratio	11.78%
Total Capital ratio	11.78%
CET1 overall capital requirement	7.49%
of which capital conservation buffer	2.50%
of which countercyclical buffer	0.49%
Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	3.78%

EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements

Balance sheet as on December 31	
<i>Amounts in millions of euros</i>	2023-12
Cash and cash equivalents	144
Accounts receivable and other short-term assets	783
Derivatives	88
Due from banks	432
Due from customers	42,104
Fixed assets under operating lease	2,385
Goodwill and other intangible assets	3
Current tax receivables	162
Deferred tax assets	236
Other assets	175
Disposal group held for sale	19
Total assets	46,531
Short-term loans and overdrafts	6,202
Accounts payable and other short-term liabilities	898
Issued debt securities	2,999
Provisions	127
Derivatives	55
Long-term borrowings	30,580
Current tax payables	69
Deferred tax liabilities	185
Other liabilities	658
Liabilities in disposal group held for sale	1
Total liabilities	41,774
Capital instruments and share premium	1,233
Retained earnings	2,913
Foreign currency translation reserve	16
Non-controlling interest	595
Total shareholders' equity	4,757
Total liabilities and shareholders' equity	46,531

The retained earnings of EUR 2,913 million as reflected in the DLL financial statements include EUR 349 million of result for the year 2023, which are not yet included in the capital used to the capital ratios (Common Equity Tier 1 ratio, Tier 1 ratio and Total Capital ratio).

Countercyclical buffer

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

Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

on December 31, 2023

	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
<i>Amounts in millions of euros</i>													
Argentina	31	-	-	-	-	31	2	-	-	2	19	0.07%	0.00%
Austria	35	100	-	-	-	134	8	-	-	8	104	0.38%	0.00%
Australia	697	2,512	-	-	-	3,209	195	-	-	195	2,442	8.96%	1.00%
Belgium	46	311	-	-	-	357	18	-	-	18	226	0.83%	0.00%
Brazil	1	2,736	-	-	-	2,738	142	-	-	142	1,772	6.50%	0.00%
Canada	145	2,688	-	-	-	2,833	85	-	-	85	1,067	3.91%	0.00%
Switzerland	159	1	-	-	-	160	10	-	-	10	130	0.48%	0.00%
Chile	189	-	-	-	-	189	12	-	-	12	145	0.53%	0.00%
Colombia	1	-	-	-	-	1	0	-	-	0	1	0.00%	0.00%
Czech Republic	0	1	-	-	-	1	0	-	-	0	1	0.00%	2.00%
Germany	979	3,184	-	-	-	4,163	168	-	-	168	2,095	7.69%	0.75%
Denmark	75	342	-	-	-	417	19	-	-	19	236	0.87%	2.50%
Spain	72	825	-	-	-	897	45	-	-	45	568	2.09%	0.00%
Finland	8	81	-	-	-	89	4	-	-	4	53	0.19%	0.00%
France	180	2,471	-	-	-	2,650	87	-	-	87	1,082	3.97%	0.50%
United Kingdom	461	2,012	-	-	-	2,472	97	-	-	97	1,211	4.44%	2.00%
Hong Kong	3	0	-	-	-	3	0	-	-	0	2	0.01%	1.00%

Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

on December 31, 2023

	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
<i>Amounts in millions of euros</i>													
Hungary	106	0	-	-	-	107	7	-	-	7	89	0.33%	0.00%
Republic of Ireland	354	110	-	-	-	464	24	-	-	24	302	1.11%	1.00%
Italy	171	1,901	-	-	-	2,072	128	-	-	128	1,595	5.85%	0.00%
South Korea	248	0	-	-	-	248	15	-	-	15	190	0.70%	0.00%
Luxembourg	1	3	-	-	-	4	0	-	-	0	3	0.01%	0.50%
Mexico	258	-	-	-	-	258	17	-	-	17	213	0.78%	0.00%
Netherlands	215	5,560	-	-	-	5,775	316	-	-	316	3,948	14.49%	1.00%
Norway	111	480	-	-	-	590	23	-	-	23	291	1.07%	2.50%
New Zealand	467	94	-	-	-	561	36	-	-	36	444	1.63%	0.00%
Peru	6	-	-	-	-	6	0	-	-	0	4	0.02%	0.00%
Poland	396	-	-	-	-	396	25	-	-	25	315	1.16%	0.00%
Portugal	18	94	-	-	-	111	9	-	-	9	118	0.43%	0.00%
Sweden	81	733	-	-	-	814	32	-	-	32	396	1.45%	2.00%
Singapore	100	0	-	-	-	100	7	-	-	7	87	0.32%	0.00%
United States	878	14,836	-	-	-	15,714	648	-	-	648	8,102	29.73%	0.00%
Total	6,493	41,074	-	-	-	47,567	2,180	-	-	2,180	27,253	100.00%	

EU CCyB2 – Amount of institution-specific countercyclical capital buffer

Amount of institution-specific countercyclical buffer

<i>Amounts in millions of euros</i>	2023-12
Total risk exposure amount	31,647
Institution-specific countercyclical capital buffer rate (%)	0.49%
Institution-specific countercyclical capital buffer requirement	155

Leverage ratio

EU LRA – Disclosure of LR qualitative information

The current level of the leverage ratio of DLL is well above the regulatory minimum requirement, therefore no explicit target has been defined. The leverage ratio has also never been below the minimum level. Our strategy is based on performance improvement and selective asset growth, which is the foundation for a sound leverage ratio. The leverage ratio is a less binding constraint for DLL in relation to the risk based capital requirements. Potential changes in regulation relating to the leverage ratio are monitored and their potential impact is assessed. The risk profile of the bank (such as the risk-weighted exposure amounts) is our primary driver in controlling the business.

EU LR1-LRSum – Summary reconciliation of accounting assets and leverage ratio exposures

Reconciliation balance sheet and LR exposures	
Amounts in millions of euros	Applicable amount
Total assets as per published financial statements	46,531
Adjustment for entities that are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-
(Adjustment for securitized exposures that meet the operational requirements for the recognition of risk transference)	-
(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
(Adjustment for fiduciary assets recognized on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
Adjustment for regular-way purchases and sales of financial assets subject to trade-date accounting	-
Adjustment for eligible cash-pooling transactions	-
Adjustments for derivative financial instruments	197
Adjustment for securities financing transactions (SFTs)	-
Adjustment for off-balance-sheet items (i.e., conversion to credit equivalent amounts of off-balance-sheet exposures)	2,097
(Adjustment for prudent valuation adjustments and specific and general provisions that have reduced Tier 1 capital)	-
(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
Other adjustments	(75)
Total exposure measure	48,750

EU LR2-LRCom – Leverage ratio common disclosure

Leverage ratio common disclosure

Amounts in millions of euros		CRR leverage ratio exposures	
		2023-12	2022-12
On-balance-sheet exposures (excluding derivatives and SFTs)			
1	On-balance-sheet items (excluding derivatives and SFTs, but including collateral)	46,443	43,135
2	Gross-up for derivatives collateral provided	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	(Adjustment for securities received under securities financing transactions that are recognized as an asset)	-	-
5	(General credit risk adjustments to on-balance-sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(75)	(67)
7	Total on-balance-sheet exposures (excluding derivatives and SFTs)	46,368	43,068
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e., net of eligible cash variation margin)	123	248
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardized approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	162	119
EU-9a	Derogation for derivatives: potential future exposure contribution under the simplified standardized 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 standardized 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	285	367
Securities financing transaction (SFT) exposures			
14	Gross SFT assets	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	-	-
EU-16a	Derogation for SFTs: counterparty credit risk exposure	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-

Leverage ratio common disclosure

Amounts in millions of euros		CRR leverage ratio exposures	
		2023-12	2022-12
18	Total securities financing transaction exposures	-	-
Other off-balance-sheet exposures			
19	Off-balance-sheet exposures at gross notional amount	12,302	8,767
20	(Adjustments for conversion to credit equivalent amounts)	(10,205)	(7,362)
21	(General provisions associated with off-balance-sheet exposures deducted)	-	-
22	Off-balance-sheet exposures	2,097	1,405
Excluded exposures			
EU-22a	(Exposures excluded from the leverage ratio 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 - Public sector investments)	-	-
EU-22d	(Excluded promotional loans of public development banks)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks)	-	-
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)	-	-
EU-22i	(Excluded CSD related services of designated institutions)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
Capital and total exposure measure			
23	Tier 1 capital	3,729	3,494
24	Leverage ratio total exposure measure	48,750	44,840
Leverage ratio			
25	Leverage ratio (%)	7.65%	7.79%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	7.65%	7.79%
25a	Leverage ratio (excluding any exemption of central bank reserves) (%)	7.65%	7.79%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital (%)	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%

Choice on transitional arrangements and relevant exposures

Leverage ratio common disclosure

Amounts in millions of euros		CRR leverage ratio exposures	
		2023-12	2022-12
EU-27	Choice on transitional arrangements for the definition of the capital measure	Fully phased in	Fully phased in
Disclosure of mean values			
28	Mean of daily values of gross SFT assets	-	-
29	Quarter-end value of gross SFT assets	-	-
30	Total exposures (including any exemption of central bank reserves)	48,750	44,840
30a	Total exposures (excluding any exemption of central bank reserves)	48,750	44,840
31	Leverage ratio (including any exemption of central bank reserves)	7.65%	7.79%
31a	Leverage ratio (excluding any exemption of central bank reserves)	7.65%	7.79%

EU LR3-LRSpl – Split-up of on-balance-sheet exposures (excluding derivatives, SFTs and exempted exposures)

Split-up of on-balance-sheet exposures

Amounts in millions of euros	CRR leverage ratio exposures
Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	46,443
Trading book exposures	-
Banking book exposures, of which:	46,443
Covered bonds	-
Exposures treated as sovereigns	794
Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-
Institutions	656
Secured by mortgages of immovable properties	-
Retail exposures	28,377
Corporate	15,300
Exposures in default	674
Other exposures (eg equity, securitisations, and other non-credit obligation assets)	642

Credit risk

Credit risk is defined as the risk of DLL facing an economic loss because its counterparties cannot perform their contractual obligations.

Management of credit risk within the bank is governed by the DLL Group credit risk policies and standards that are further detailed in underlying specific credit risk procedures and local policies and/or manuals.

The primary responsibility for managing and monitoring credit risk lies with the countries as the first line of responsibility. The countries are required to identify, assess, manage, monitor, and report potential risks in the credit portfolios. Monitoring takes place on an ongoing basis to manage credit risk exposures to a level that is in line with the risk appetite.

In addition, risks in the credit portfolio are measured and monitored DLL-wide and at country level on a monthly basis, as well as by quarterly and ad-hoc portfolio reporting and analysis, with specific attention to risk developments and concentrations.

EU CRB – Additional disclosure related to the credit quality of assets

Credit risk quality

DLL has several parameter frameworks for assessing the credit quality of obligors/facilities. Particularly in recent years, external regulation (e.g., regarding forbearance and default assignment) has encouraged the banking industry to extend the number of credit risk parameter frameworks.

Credit risk classification

The Credit Risk Classification (CRC) framework is being used to assess the credit quality of our clients. The CRC consists of four classifications: Good, Early Warning (EW), Financial Difficulties (FD), and Default. The four classes determine the required intensiveness and the appropriate level of account management. The determination of the CRC should be based on ability of the obligor to meet its financial commitments on a going-concern basis and should not take into account any elements related to the security position of the bank towards the obligor (e.g., collateral, guarantees etc.). The CRC helps to:

- Increase objectivity by using decision trees and improving and clarifying definitions;
- Simplify our broader Credit Risk Parameter framework by aligning the frameworks used within the bank (CRC, RRR, Forbearance, and IFRS 9 Stages);
- Identify signals earlier, report with more transparency on portfolio quality and manage clients more effectively; and
- Achieve a more forward-looking approach to credit classifications.

Past-due, defaults and loan impairment allowances

For the purpose of reporting, DLL distinguishes several types of loans for which servicing commitments are not being met, like:

- Past-due loans: Interest, repayments or overdrafts on a loan have been due for payment for more than one day;
- Defaulted loans: It is unlikely that the obligor/facility will pay its debt obligations (principal, interest and/or fees) in full, without recourse by the bank to actions such as realizing security (if held) or granting viable forbearance measures and/or the obligors has arrears exceeding the regulatory defined materiality thresholds for 90 or more consecutive days.

D1-D4, default, and Stage 3 are always fully aligned and therefore:

- When an obligor/facility is Defaulted, an IFRS 9 Stage 3 loan loss provision should be determined, and a RRR of D1, D2, D3 or D4 is applicable;
- When an obligor/facility is non-Defaulted, a RRR of R0-R20 is applicable,
- When an obligor/facility is non-Defaulted, IFRS 9 stage 1 or 2 is applicable.

In relation to the IFRS 9 staging:

- Obligors in the CRC Good category are always in IFRS stage 1;
- Obligors that are classified as CRC FD (and thus non-defaulted) always belong to Stage 2, but not vice versa (Stage 2 and FD triggers are not fully aligned);
- Obligors with Facilities in Stage 2 but not CRC FD should always be classified as CRC EW.

The obligor is cured from default when all the requirements of the (i) Financial Exit Criteria and (ii) Probation Period for Default are met.

Classification

DLL classifies its financial assets within the following measurement categories:

- Those to be measured subsequently at fair value (either through OCI or through profit or loss) and
- Those to be measured at amortized cost.

The classification depends on:

1. Business model assessment; Assessment of how the business is managed and how the business is seen from a strategic point of view:
 - Hold to collect: Where the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; or
 - Hold to collect and sell: Where the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; or
 - Other business model.
2. Contractual cash flow assessment: Assessment of whether the cash flows of the financial assets are Solely Payments of Principal and Interest (SPPI).

The business model assessment can be made on a portfolio basis, whereas the contractual cash flow assessment is made for each individual financial asset. DLL only reclassifies debt instruments when the business model for managing those assets changes.

A debt instrument that is held within a "hold to collect" business model and meets the SPPI test is measured at amortized cost unless the asset is designated at fair value through profit or loss.

A debt instrument that is held within a "hold to collect and sell" business model and meets the SPPI test is measured at fair value with fair value adjustments recognized in other comprehensive income unless the asset is designated at fair value through profit or loss.

All other debt instruments are mandatorily measured at fair value through profit or loss. All equity instruments in the scope of IFRS 9 are measured at fair value with fair value adjustments recognized in profit or loss or in other comprehensive income. The option to designate an equity instrument at fair value through other comprehensive income is available at initial recognition and is irrevocable.

Measurement

At initial recognition, DLL measures a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss, transaction costs that are directly attributable to the acquisition of the financial

asset. Transaction costs of financial assets measured at fair value through profit or loss are expensed to profit or loss. Financial assets with embedded derivatives are considered in their entirety when determining whether their cash flows meet the SPPI requirements. Derivative financial instruments are initially recognized and subsequently measured at fair value through profit or loss.

Impairment allowances on financial assets

The rules governing impairments apply to financial assets at amortized cost and financial assets at fair value through OCI, as well as to lease receivables, contract assets, trade receivables, certain loan commitments, and financial guarantees. At initial recognition, an allowance is formed for the amount of the expected credit losses from possible defaults in the coming 12 months ("12-months expected credit loss" (ECL)). If credit risk has increased significantly since origination (but remains non-credit impaired), an allowance is required for the amount that equals the expected credit losses stemming from possible defaults during the expected lifetime of the financial asset ("Lifetime ECL"). If the financial instrument becomes credit-impaired, the allowance will remain at the Lifetime ECL. The interest income for these instruments will be recognized by applying the effective interest rate on the net carrying amount (including the allowance). Financial instruments become credit-impaired when one or more events have occurred that had a detrimental impact on estimated future cash flows.

Two fundamental drivers of the IFRS 9 impairments requirements are a) the methodology for the measurement of 12-month and Lifetime ECL and b) the criteria used to determine whether a 12-month ECL, Lifetime ECL non-credit impaired, or Lifetime ECL credit-impaired should be applied (also referred to as stage determination criteria).

a) Methodology to determine expected credit losses

In order to determine ECLs, DLL utilizes point-in-time PD x LGD x EAD models for the majority of the portfolio in scope. Three global macroeconomic scenarios are incorporated into these models and probability weighted in order to determine the expected credit losses. When unexpected external developments or data quality issues are not sufficiently covered by the outcome of the ECL models, an adjustment will be made.

b) Stage determination criteria

A framework of qualitative and quantitative factors has been developed in order to allocate financial instruments in scope between the categories 12-month ECL (stage 1), Lifetime ECL non-credit-Impaired (stage 2) and Lifetime ECL Credit-Impaired (stage 3). The criteria for allocating a financial instrument to stage 3 are fully aligned with the criteria for assigning a defaulted status. In order to allocate financial instruments between stages 1 and 2, DLL uses criteria, such as days past due status, CRC, deterioration of the lifetime PD since origination, unit of account, and Purchased & Originated Credit Impaired (POCI). For portfolios without individual PDs or with PDs that are not updated on a frequent basis such that an assessment of the change in PD is not possible, a collective assessment will be made on groups of financial instruments with shared credit risk characteristics.

After a loan or lease has been granted, continuous client monitoring takes place. New financial and non-financial information is assessed. DLL ascertains whether the client complies with the agreement made and whether it can be expected that the client will remain compliant in the future. If this is expected not to be the case, credit management is intensified, monitoring becomes more frequent, and a closer eye is kept on credit terms. If it is likely that a debtor will be unable to pay the amounts owed to DLL in accordance with the contractual obligations, this will give rise to an impairment (impaired loan). If necessary, an allowance is made that is charged to income.

Forbearance

The forbearance portfolio is composed of DLL obligors for whom forbearance measures have been put in place. Forbearance measures consist of concessions granted to an obligor that faces or is expected to face financial difficulties. DLL distinguishes two types of Concessions:

- Modification: A contractual adjustment of the previous terms and conditions of contractual obligations of an (joint) obligor, including the exercise of embedded clauses by the obligor.
- Refinancing: The use of new contractual obligation(s) to ensure:
 - The total or partial payment of other debt contracts, and/or
 - Additional financing.

The forborne portfolio is managed by Credit and Risk as the clients concerned have a CRC of Financial Difficulty or Default applies.

EU CR1 – Performing and non-performing exposures and related provisions

Performing and non-performing exposures and related provisions

	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
<i>Amounts in millions of euros</i>															
Cash balances at central banks and other demand deposits	157	157	-	-	-	-	-	-	-	-	-	-	-	-	-
Loans and advances	41,993	34,688	7,305	870	-	870	(214)	(96)	(119)	(223)	-	(223)	-	39,643	502
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	240	184	56	4	-	4	(1)	(0)	(0)	(1)	-	(1)	-	224	3
Credit institutions	419	395	24	0	-	0	(0)	(0)	(0)	(0)	-	(0)	-	74	0
Other financial corporations	814	753	60	18	-	18	(3)	(2)	(1)	(4)	-	(4)	-	771	10
Non-financial corporations	39,222	32,098	7,124	805	-	805	(208)	(92)	(116)	(211)	-	(211)	-	37,284	455
Of which SMEs	31,418	25,333	6,085	748	-	748	(183)	(76)	(107)	(199)	-	(199)	-	29,780	412
Households	1,299	1,258	41	43	-	43	(2)	(2)	(0)	(7)	-	(7)	-	1,289	33
Debt securities	259	259	-	-	-	-	-	-	-	-	-	-	-	-	-
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	60	60	-	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	198	198	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Off-balance-sheet exposures	12,302	12,302	-	-	-	-	-	-	-	-	-	-	-	-	-
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	42	42	-	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	16	16	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	391	391	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	11,853	11,853	-	-	-	-	-	-	-	-	-	-	-	-	-
Households	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	54,711	47,406	7,305	870	-	870	(214)	(96)	(119)	(223)	-	(223)	-	39,643	502

The main topics regarding 2023 for the non-performing loan (NPL) portfolio are:

– The NPL ratio remained stable during the year;

– Total stage 3 defaulted exposures slightly increased compared to year-end 2023;

– During the year, defaults increased, pointing towards a more challenging 2024.

EU CQ1 – Credit quality of forborne exposures

Credit quality of forborne exposures

Amounts in millions of euros	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
	Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures	
			Of which defaulted					Of which impaired
Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
Loans and advances	36	103	103	103	(1)	(26)	112	68
Central banks	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-
Other financial corporations	1	2	2	2	(0)	(0)	2	2
Non-financial corporations	35	101	101	101	(1)	(26)	109	66
Households	-	1	1	1	-	(0)	1	1
Debt securities	-	-	-	-	-	-	-	-
Loan commitments given	-	-	-	-	-	-	-	-
Total	36	103	103	103	(1)	(26)	112	68

EU CQ3 – Credit quality of performing and non-performing exposures by past due days

Credit quality of performing and non-performing exposures by past due days

Amounts in millions of euros	Gross carrying amount/nominal amount												
	Performing exposures			Non-performing exposures									Of which defaulted
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years		
Cash balances at central banks and other demand deposits	157	157	-	-	-	-	-	-	-	-	-	-	
Loans and advances	41,993	41,592	402	870	506	174	126	35	21	4	4	870	
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	
General governments	240	233	6	4	3	1	1	0	0	-	-	4	
Credit institutions	419	418	1	0	0	0	0	-	-	-	-	0	
Other financial corporations	814	806	8	18	9	5	3	1	0	0	0	18	
Non-financial corporations	39,222	38,845	377	805	466	159	118	34	21	4	4	805	
Of which SMEs	31,418	31,100	318	748	414	155	117	34	21	4	4	748	
Households	1,299	1,289	10	43	29	9	5	-	-	-	-	43	
Debt securities	259	259	-	-	-	-	-	-	-	-	-	-	
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	
General governments	60	60	-	-	-	-	-	-	-	-	-	-	
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	
Other financial corporations	198	198	-	-	-	-	-	-	-	-	-	-	
Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	
Off-balance-sheet exposures	12,302	-	-	-	-	-	-	-	-	-	-	-	
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	
General governments	42	-	-	-	-	-	-	-	-	-	-	-	
Credit institutions	16	-	-	-	-	-	-	-	-	-	-	-	
Other financial corporations	391	-	-	-	-	-	-	-	-	-	-	-	
Non-financial corporations	11,853	-	-	-	-	-	-	-	-	-	-	-	
Households	0	-	-	-	-	-	-	-	-	-	-	-	
Total	54,711	42,007	402	870	506	174	126	35	21	4	4	870	

The majority of the non-performing exposures fall in the category "Unlikely to pay that are not past due or past due ≤ 90 days." Furthermore, DLL considers non-performing exposures as defaulted exposure and defaulted exposures as non-performing exposures.

EU CQ4 – Quality of non-performing exposures by geography

Quality of non-performing exposures by geography

Amounts in millions of euros	Gross carrying/nominal amount			Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing		Of which defaulted				
On-balance-sheet exposures	43,122	870	870	43,122	(437)	-	-
United States	15,295	400	400	15,295	(158)	-	-
Germany	3,830	49	49	3,830	(25)	-	-
Australia	3,028	21	21	3,028	(19)	-	-
France	2,973	71	71	2,973	(32)	-	-
United Kingdom	2,378	19	19	2,378	(8)	-	-
Canada	2,882	32	32	2,882	(20)	-	-
Italy	2,159	51	51	2,159	(34)	-	-
Netherlands	1,772	27	27	1,772	(17)	-	-
Other countries	8,805	200	200	8,805	(125)	-	-
Off-balance-sheet exposures	12,302	-	-	-	-	-	-
United States	5,140	-	-	-	-	-	-
Germany	3,046	-	-	-	-	-	-
Canada	781	-	-	-	-	-	-
France	677	-	-	-	-	-	-
United Kingdom	589	-	-	-	-	-	-
Netherlands	367	-	-	-	-	-	-
Other countries	1,703	-	-	-	-	-	-
Total	55,425	870	870	43,122	(437)	-	-

After a year of record low credit impairments (excluding the impact of the loss on selling our Russian operations), levels began to return to normal in 2023.

EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry

Credit quality of loans and advances to non-financial corporations by industry

Amounts in millions of euros	Gross carrying amount			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing				
			Of which defaulted			
Agriculture, forestry and fishing	12,725	279	279	12,725	(128)	-
Mining and quarrying	189	4	4	189	(2)	-
Manufacturing	3,485	68	68	3,485	(38)	-
Electricity, gas, steam and air conditioning supply	140	3	3	140	(2)	-
Water supply	218	2	2	218	(2)	-
Construction	2,105	62	62	2,105	(27)	-
Wholesale and retail trade	8,771	64	64	8,771	(48)	-
Transport and storage	1,632	68	68	1,632	(28)	-
Accommodation and food service activities	218	4	4	218	(3)	-
Information and communication	870	10	10	870	(7)	-
Financial and insurance activities	-	-	-	-	-	-
Real estate activities	343	10	10	343	(6)	-
Professional, scientific and technical activities	1,334	29	29	1,334	(17)	-
Administrative and support service activities	3,159	62	62	3,159	(30)	-
Public administration and defense, compulsory social security	-	-	-	-	-	-
Education	530	11	11	530	(7)	-
Human health services and social work activities	3,046	90	90	3,046	(55)	-
Arts, entertainment and recreation	451	19	19	451	(8)	-
Other services	812	20	20	812	(11)	-
Total	40,027	805	805	40,027	(419)	-

After a year of record low credit impairments (excluding the impact of the loss on selling our Russian operations), levels began to return to normal in 2023.

Excluding the loss on Russia, Stage 1 and 2 credit impairments (related to performing loans and advances) grew significantly in 2023, mainly driven by a combination of portfolio growth and the deteriorating economic outlook, the so-called macroeconomic scenarios.

Stage 3 risk costs (related to non-performing loans and advances) also grew, mainly in the last quarter. An increase in defaults drove up stage 3 impairments. The deterioration of the macroeconomic scenarios points toward this trend continuing in 2024.

EU CQ7 – Collateral obtained by taking possession and execution processes

Collateral obtained by taking possession and execution processes

<i>Amounts in millions of euros</i>	Collateral obtained by taking possession	
	Value at initial recognition	Accumulated negative changes
Property, plant and equipment (PP&E)	-	-
Other than PP&E	18	(4)
Residential immovable property	-	-
Commercial Immovable property	-	-
Movable property	18	(4)
Equity and debt instruments	-	-
Other collateral	-	-
Total	18	(4)

When a foreclosure is executed, DLL normally tries to auction the asset that served as security for the loan or lease, which does not lead to the recognition of the collateral on our own book. Therefore, the number reported in the template is very limited.

Disclosure of the usage of credit risk mitigation techniques

DLL employs a range of mitigation techniques to reduce credit risk, which are covered below.

EU CRC – Qualitative disclosure requirements related to CRM techniques

For credit risk mitigation, DLL, being an asset-based finance company, mainly relies on the asset that is financed, being at the same time the primary source of collateral (credit risk mitigation). Balance sheet netting is not applied.

DLL has a specialized asset management department that is responsible for asset valuation and residual value estimation. These estimations are taken into account during underwriting new business. Value lines are available for every relevant asset, reflecting the value of the asset during the economic lifetime of the asset.

Assets that are financed by DLL (and that are the prime source of collateral for DLL) fall into the following industries: Agriculture, Food, Healthcare, Energy transition, Construction, Transportation, Industrial equipment, Office equipment and Technology.

DLL has a highly diversified portfolio, in terms of number of obligors, number of contracts, countries where exposures are booked and assets that are financed.

Although the majority of DLL's portfolio is collateralized, from a capital requirements regulation (CRR) perspective the collateral is considered to be uneligible, which is a prudent approach.

EU CR3-CRM techniques overview – Disclosure of the use of credit risk mitigation techniques

CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

Amounts in millions of euros	Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	
					Of which secured by credit derivatives
Loans and advances	2,438	40,144	39,981	163	-
Debt securities	259	-	-	-	-
Total	2,697	40,144	39,981	163	-
Of which non-performing exposures	145	502	493	8	-
Of which defaulted	-	-	-	-	-

The use of the standardized approach to credit risk

DLL's policy is aimed at applying the Advanced Internal Ratings-Based Approach (A-IRB) approach to its credit portfolio as much as possible. However, there are exceptions where it is allowed, necessary or forced to apply less sophisticated approaches (SA instead A-IRB) to certain portfolios.

DLL hardly uses external ratings for risk weighting under the standardized approach. Permission has been granted by the ECB to move the portfolio of Institutions and CG&CB to SA.

EU CR4 – Standardized approach – Credit risk exposure and CRM effects

Standardized approach - credit risk exposure and CRM effects

Amounts in millions of euros	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWEAs and RWEAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEAs	RWEAs density
Central governments or central banks	794	-	794	-	640	80.6%
Regional government or local authorities	-	-	-	-	-	0.0%
Public sector entities	-	-	-	-	-	0.0%
Multilateral development banks	-	-	-	-	-	0.0%
International organizations	-	-	-	-	-	0.0%
Institutions	656	-	656	-	329	50.2%
Corporates	2,757	12,302	2,745	1,537	4,086	95.4%
Retail	2,179	-	2,168	-	1,490	68.7%
Secured by mortgages on immovable property	-	-	-	-	-	0.0%
Exposures in default	54	-	43	-	43	100.0%
Exposures associated with particularly high risk	-	-	-	-	-	0.0%
Covered bonds	-	-	-	-	-	0.0%
Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0.0%
Collective investment undertakings	-	-	-	-	-	0.0%
Equity	-	-	-	-	-	0.0%
Other items	-	-	-	-	-	0.0%
Total	6,440	12,302	6,406	1,537	6,588	82.9%

The use of the IRB approach to credit risk

DLL's policy is aimed at applying the Advanced Internal Ratings-Based (A-IRB) approach to its credit portfolio as much as possible. However, there are exceptions where it is allowed, necessary or forced to apply less sophisticated approaches (SA instead A-IRB) to certain portfolios.

For the A-IRB portfolio, internally developed Probability of Default (PD) and Loss Given Default (LGD) models are available. During the PD and LGD model development recoveries of all credit risk mitigation techniques are taken into account. DLL does not make use of credit derivatives.

EU CR8-RWEA flow statements of credit risk exposures under the IRB approach

RWEA flow statements of credit risk exposures under the IRB approach

	Risk weighted exposure amount
<i>Amounts in millions of euros</i>	
Risk weighted exposure amount as on December 2022	14,019
Asset size (+/-)	1,238
Asset quality (+/-)	76
Model updates (+/-)	-
Methodology and policy (+/-)	6,502
Acquisitions and disposals (+/-)	-
Foreign exchange movements (+/-)	(174)
Other (+/-)	(26)
Risk weighted exposure amount as on December 2023	21,635

The movement due to methodology and policy changes (EUR 6,502 million) is not a real change in DLL's IRB treated RWEA. This mainly concerns RWEA related to DLL's Return to Compliance plan, which was reported until December end 2022 as one lumpsum amount under CRR article 3. On December end 2023 data the RWEA is reported on granular contract level and rolls up in the IRB based RWEA.

The remaining RWEA movement of IRB treated exposures can be largely explained by asset size growth which is related to organic growth of DLL's IRB portfolio.

EU CR7-IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

IRB approach – Effect on the RWEAs of credit derivatives

	Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
<i>Amounts in millions of euros</i>		
Exposures under F-IRB	-	-
Central governments or central banks	-	-
Institutions	-	-
Corporates	-	-
of which SMEs	-	-
of which Specialized lending	-	-
Exposures under AIRB	18,522	18,522
Central governments or central banks	-	-
Institutions	-	-
Corporates	8,229	8,229
of which Corporates – SMEs	3,010	3,010
of which Corporates – Specialized lending	-	-
Retail	10,293	10,293
of which Retail – SMEs – Secured by immovable property	-	-
of which Retail – non-SMEs – Secured by immovable property	-	-
of which Retail – Qualifying revolving	-	-
of which Retail – SMEs – Other	9,785	9,785
of which Retail – Non-SMEs – Other	508	508
TOTAL (including F-IRB exposures and A-IRB exposures)	18,522	18,522

DLL does not make use of credit derivatives, hence there is no impact on the RWA.

EU CR7-A-IRB approach – Disclosure of the extent of the use of CRM techniques

IRB - usage of CRM techniques

	Total exposures	Credit risk Mitigation techniques										Credit risk Mitigation methods in the calculation of RWEAs			
		Funded credit Protection (FCP)									Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)	
		Part of exposures covered by Other eligible collaterals (%)					Part of exposures covered by Other physical collateral (%)				Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)			
		Part of exposures covered by Financial 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 Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)							
<i>Amounts in millions of euros</i>															
Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporates	12,725	-	-	-	-	-	-	-	-	-	-	-	-	8,229	8,229
Of which Corporates – SMEs	5,101	-	-	-	-	-	-	-	-	-	-	-	-	3,010	3,010
Of which Corporates – Specialized lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which Corporates – Other	7,624	-	-	-	-	-	-	-	-	-	-	-	-	5,219	5,219
Retail	27,078	-	-	-	-	-	-	-	-	-	-	-	-	10,293	10,293
Of which Retail – Immovable property SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which Retail – Immovable property non-SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which Retail – Qualifying revolving	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which Retail – Other SMEs	25,738	-	-	-	-	-	-	-	-	-	-	-	-	9,785	9,785
Of which Retail – Other non-SMEs	1,340	-	-	-	-	-	-	-	-	-	-	-	-	508	508
Total	39,803	-	-	-	-	-	-	-	-	-	-	-	-	18,522	18,522

Although DLL is an asset based financing company, which mainly has loans and leases that are backed by collateral, not all CRR requirements to recognize loans and leases as collateralized are met.

Remuneration

EU REMA – Remuneration Policy

DLL seeks to hire the best talent in each local market and therefore aims to provide a remuneration package that is market competitive and in line with responsibilities and performance. Furthermore, the remuneration policy is aimed at encouraging behavior in line with our core values, global alignment, cooperation and personal development.

Remuneration Policy

Within the framework of our parent's vision on remuneration and Rabobank Group Remuneration Policy, we have our own global DLL remuneration policy. This policy is designed to promote fair and consistent employee compensation based on an effective job classification system. While the Global Remuneration Policy (GRP) applies to all DLL entities worldwide, minor differences may apply per country. This relates to the application of local legislation, national collective labor agreements or local labor market practices. Furthermore, the salary and incentive levels are country specific, aligned with local labor markets. In all countries we have implemented a remuneration package that consists of fixed and variable remuneration components and various fringe benefits. In many countries we have implemented a pension scheme.

The remuneration packages for the Executive Board are subject to review and approval by the Supervisory Board.

Rabobank Group Remuneration Policy

The principles and guidelines of Rabobank's vision on remuneration are detailed in the Rabobank Group Remuneration Policy. The requirements under external legislation and regulations are also enshrined in this policy, including the Dutch Financial Undertakings Remuneration Policy Act (*Wbfo*), the Regulations on Restrained Remuneration Policies, the Capital Requirements Directive IV (CRD IV) and the Dutch Banking Code. The Rabobank Group Remuneration Policy applies to the Rabobank Group as a whole, including DLL. Consequently, we follow this policy consistently. The policy supports solid and effective risk management processes and discourages employees from taking undesirable risks. It also encourages employees to consider the longer-term impact in the interests of both Rabobank Group and its clients.

Identified Staff

Employees who can have a significant impact on DLL's risk profile are designated as "Identified Staff." In 2023, 86 roles within DLL were determined to be Identified Staff (including Supervisory Board members). In general, these members are not eligible for variable remuneration. In exceptional cases where they are eligible, their incentive is governed by the principles laid down in the Rabobank Group Remuneration Policy. The most important of these risk-mitigating measures are discussed below. As is the case for all other employees, Identified Staff must meet a proper balance of performance objectives. Identified Staff are specifically subject to performance measurements at group, business unit and individual levels.

if variable remuneration is granted, it is partly deferred in line with EBA regulations (a minimum of 40%). The direct portion of variable remuneration (50%) is unconditional, whereas the deferred portion (50%) is conditional. Each year one-third part of the deferred variable remuneration becomes unconditional. The cash component of the direct portion is immediately paid after it has been awarded. The cash component of the deferred portion is awarded to employees only after vesting. The other 50% of the variable remuneration is awarded in the form of an underlying instrument, i.e. the Deferred Remuneration Note (DRN). The value of a DRN is linked directly to the price of a Rabobank Certificate (RC) as listed on Euronext Amsterdam.

The instrument component is converted into DRNs at the time of allocation on completion of the performance year. The number of DRNs is determined based on the closing rates of the RCs as traded during the first five trading days of February of each year. This therefore represents both the instrument component of the direct and the deferred portion of the variable remuneration. The final number of DRNs relating to the deferred portion is established on vesting. The payment of the instrument component is subject to a one-year retention period. After the end of the retention period, the employee receives for each DRN (or a portion thereof) an amount in cash that corresponds with the value of the DRN at that moment.

The deferred part of the variable pay vests for identified staff in equal parts during four years after the end of the relevant performance period, provided that (i) the participant is still employed by DLL at that time, and (ii) the ex-post evaluation does not give cause to adjust the deferred part of the variable pay (malus).

With respect to the application of malus the following assessment framework is applied to all Identified Staff:

- Proof of material errors by the employee;
- Award of the variable pay on the basis of incorrect, misleading information or as a result of fraudulent conduct by the relevant employee;
- Participation in or responsibility for conduct that has led to considerable loss and/or damage to the reputation of Rabobank;
- Proof of the employee not meeting the applicable standards with respect to ability and correct conduct;

- Overall financial performance. The minimum requirement is that after award and payment of variable pay, Rabobank's CET1 capital ratio must be at or above the threshold laid down under the applicable legislation (Basel). If and to the extent that this minimum requirement is not met, variable pay will not be awarded or paid (in full);
- A significant breach in risk management;
- A significant negative change in the CET1 capital ratio of Rabobank.

DLL offers no fixed or variable pay in the form of options or shareholding rights to employees.

Guaranteed variable remuneration is only permitted in the form of a sign-on bonus in the first year of employment. These bonuses can only be awarded if Rabobank has a strong and solid capital basis.

Severance payments must be demonstrably related to the performance of the employee over time. For daily policy-makers (*Dagelijks Beleidbepalers*) severance payments are capped at a maximum of 100% of the fixed pay on an annual basis.

EU REM1 – Remuneration awarded for the financial year

Remuneration awarded for the financial year		MB Supervisory function	MB Management function	Other senior management	Other Identified Staff
Amounts in EUR thousands					
Fixed remuneration	Number of Identified Staff	5	7	74	-
	Total fixed remuneration	223	3,776	20,867	-
	Of which cash-based	-	-	-	-
	(Not applicable in the EU)	-	-	-	-
	Of which shares or equivalent ownership interests	-	-	-	-
	Of which share-linked instruments or equivalent non-cash instruments	-	-	-	-
	Of which other instruments	-	-	-	-
	(Not applicable in the EU)	-	-	-	-
	Of which other forms	-	-	-	-
	(Not applicable in the EU)	-	-	-	-
Variable remuneration	Number of identified staff	-	-	-	-
	Total variable remuneration	-	-	-	-
	Of which cash-based	-	-	-	-
	Of which deferred	-	-	-	-
	Of which shares or equivalent ownership interests	-	-	-	-
	Of which deferred	-	-	-	-
	Of which share-linked instruments or equivalent non-cash instruments	-	-	-	-
	Of which deferred	-	-	-	-
	Of which other instruments	-	-	-	-
	Of which deferred	-	-	-	-
Of which other forms	-	-	-	-	
Of which deferred	-	-	-	-	
Total		223	3,776	20,867	-

EU REM2 – Special payments to staff whose professional activities have a material impact on institutions’ risk profile (Identified Staff)

Special payments to staff whose professional activities have a material impact on institutions’ risk profile (Identified Staff)				
<i>Amounts in EUR thousands</i>	MB Supervisory function	MB Management function	Other senior management	Other Identified Staff
Guaranteed variable remuneration awards				
Guaranteed variable remuneration awards - Number of Identified Staff	-	-	-	-
Guaranteed variable remuneration awards - Total amount	-	-	-	-
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 paid out during the financial year				
Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	-	-	-	-
Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	-	-
Severance payments awarded during the financial year				
Severance payments awarded during the financial year - Number of Identified Staff	-	-	6	-
Severance payments awarded during the financial year - Total amount	-	-	2,883	-
Of which paid during the financial year	-	-	2,883	-
Of which deferred	-	-	-	-
Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
Of which highest payment that has been awarded to a single person	-	-	-	-

EU REM3 – Deferred remuneration

Deferred remuneration

<i>Amounts in EUR</i>	Total amount of deferred remuneration 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)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
MB Supervisory function								
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
MB Management function								
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Other senior management								
Cash-based	829	829	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	4,111	3,456	655	-	-	-	3,456	655
Other forms	-	-	-	-	-	-	-	-
Other Identified Staff								
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Total amount	4,940	4,285	655	-	-	-	3,456	655

EU REM4 – Remuneration of 1 million EUR or more per year

Remuneration of EUR 1 million or more per year

EUR	Identified Staff that are high earners as set out in Article 450(i) CRR
1.000.000 to below 1.500.000	-
1.500.000 to below 2.000.000	-

EU REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (Identified Staff)

Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (Identified Staff)

Amounts in EUR thousands	Management body remuneration			Business areas						Total	
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other		
Total number of Identified Staff	-	-	-	-	-	-	-	-	-	-	86
Of which members of the MB	5	7	12	-	-	-	-	-	-	-	-
Of which other senior management	-	-	-	-	-	-	-	-	13	61	-
Of which other Identified Staff	-	-	-	-	-	-	-	-	-	-	-
Total remuneration of Identified Staff	223	3,776	3,999	-	-	-	-	2,608	18,259	-	-
Of which variable remuneration	-	-	-	-	-	-	-	-	-	-	-
Of which fixed remuneration	223	3,776	3,999	-	-	-	-	2,608	18,259	-	-

Declaration Executive Board

The Executive Board of DLL declares that the risk management arrangements of DLL are adequate and assures that the risk management systems put in place are adequate to DLL's profile and strategy.

M. Janse, *COO and interim CEO (as from April 1, 2024)*

I. Eddini, *CHRO*

N. Garnett, *CCO*

Y.E. Hoefsmit, *CRO*

G.T.R. Raison, *CFO*

Eindhoven, April 30, 2024

Appendix

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

Main features of regulatory own funds instruments

Issuer	De Lage Landen International B.V.
Unique identifier (e.g; CUSIP, ISIN or Bloomberg identifier for private placement)	Shares number A1 – A215 and B1 – B2
Public or private placement	Private
Governing law(s) of the instrument	Governed by laws of the Netherlands
Contractual recognition of write-down and conversion powers of resolution authorities	n/a
Regulatory treatment	
Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1
Post-transitional CRR rules	Common Equity Tier 1
Eligible at solo/(sub-)consolidated/solo&(sub-)consolidated	Subconsolidated
Instrument type (types to be specified by each jurisdiction)	CET1 instruments as published on EBA list
Amount recognized in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 1,233 million
Nominal amount of instrument	EUR 98 million
Issue price	EUR 98 million (excluding share premium)
Redemption price	n/a
Accounting classification	Shareholders' Equity
Original date of issuance	05/04/1974 (April 5, 1974)
Perpetual or dated	Perpetual
Original maturity date	No maturity
Issuer call subject to prior supervisory approval	n/a
Optional call date, contingent call dates and redemption amount	n/a
Subsequent call dates, if applicable	n/a

Main features of regulatory own funds instruments	
Coupons/dividends	
Fixed or floating dividend/coupon	n/a
Coupon rate and any related index	n/a
Existence of a dividend stopper	n/a
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
Existence of step up or other incentive to redeem	No
Noncumulative or cumulative	Non-cumulative
Convertible or non-convertible	n/a
If convertible, conversion trigger(s)	n/a
If convertible, fully or partially	n/a
If convertible, conversion rate	n/a
If convertible, mandatory or optional conversion	n/a
If convertible, specify instrument type convertible into	n/a
If convertible, specify issuer of instrument it converts into	n/a
Write-down features	n/a
If write-down, write-down trigger(s)	n/a
If write-down, full or partial	n/a
If write-down, permanent or temporary	n/a
If temporary write-down, description of write-up mechanism	n/a
Type of subordination (only for eligible liabilities)	n/a
Ranking of the instrument in normal insolvency proceedings	n/a
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	None
Non-compliant transitioned features	n/a
If yes, specify non-compliant features	n/a
Link to the full term and conditions of the instrument (signposting)	n/a

Colophon

Published by

DLL

About the Pillar 3 report 2023

The Pillar 3 report 2023 is based on the requirements explained in article 13 paragraph 1 of the CRR, and has been prepared on a sub-consolidated basis. The information in Pillar 3 has not been audited by DLL's independent external auditors.

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Contact

DLL has exercised the utmost care in the preparation of the Pillar 3 report 2023. If you have questions or suggestions on how we can improve our reporting, please send them by email to communication@dllgroup.com.

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