



**European Bank**  
for Reconstruction and Development

# Risk Appetite Statement

23 June 2026

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# 1. Purpose and Governance

- 1.1 The Risk Appetite Statement (“this Statement”) provides a comprehensive summary of Risk Appetite parameters guiding the operations of the EBRD (“the Bank”). Its main purpose is to facilitate concise presentation and informed periodic review of the level of risk the Bank is prepared to take in its key activities. It reflects market practice, enhances the quality of internal decision-making, and helps build Bank-wide risk awareness culture. It assists the Bank in communication with stakeholders, including investors, donors and rating agencies, supporting continued access to funding and ability to pursue the Bank’s objectives.
- 1.2 The document provides a consolidated overview of how various types of risk are governed at the Bank. The following sections 2 and 3 describe the main principles underpinning risk appetite articulation and the overarching risk governance structure. Section 4 introduces Financial Loss Tolerance Thresholds (“FLTTS”) which are assessed against the results of the annual Bank-wide stress test. The FLTTS form part of the articulation of risk appetite for a number of financial risks. Sections 5 to 11 then set out in detail key aspects of the Bank’s risk appetite for each risk type. Detailed risk type definitions and metrics used for risk measurement and limitation can be found in Annex 2.
- 1.3 Most of the parameters described in this Statement have been adopted by Management and the Board of Directors (“the Board”) through dedicated policy instruments. These are referenced throughout the paper. This Statement will be updated annually to reflect changes in such underlying policies.
- 1.4 The document is prepared and updated periodically by the Vice President, Chief Risk Officer (“CRO”) in consultations with other executive managers of the Bank.

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## 2. Key Principles

- 2.1 The Bank achieves its strategic objectives by assuming risk. Without appropriate limitation, these risks have the potential to threaten its key resources including net profit, capital, liquidity and reputation. In turn, these risks could therefore undermine the trust and confidence our stakeholders, including shareholding governments, clients, donors, civil society organisations and other relevant bodies, have in the Bank, its Management, and its strategy. At the extreme, these risks could threaten the existence of the Bank and necessitate a request for callable capital.
- 2.2 To ensure that the risk profile of the Bank remains strong, based on Management's recommendation, the Board adopts a set of Risk Appetite parameters articulated in this Statement and other policy documents as appropriate. These parameters guide both strategic planning and day-to-day decisions, thereby avoiding excessive risk taking and encouraging the development of robust controls to protect the key resources of the Bank.
- 2.3 In aggregate, the Bank's standalone balance sheet strength, that facilitates the achievement of the Bank's objectives and simultaneously maintains confidence in the Bank's resilience in the face of adverse events underpins its triple-A (best in class among IFIs) ratings. The Risk Appetite parameters have been calibrated to ensure its continuation
- 2.4 Management is required to establish and maintain an appropriate infrastructure (including risk measurement, limits, rules, guidelines, independent decision-making, controls, monitoring, testing and reporting) to ensure that this Risk Appetite is complied with and to provide reports in the form of annual Bank-wide stress tests and quarterly risk reporting to evidence compliance.

### 3. Risk Governance Architecture

- 3.1 The overall Risk Governance of the Bank is anchored in the Agreement Establishing the Bank ("the AEB"). In accordance with Article 1 of the AEB, the Bank puts its capital at risk in pursuit of its mandate to promote transition towards open, market-oriented economies in its countries of operation.
- 3.2 The Bank seeks to protect and build up its capital in order to support an enhanced range and scale of activities and enable the Bank to withstand any negative impact to its capital due to financial losses resulting from credit, market or other financial risks. Consistent with Article 13(i) of the AEB, the Bank applies sound banking principles to all its operations, which typically implies alignment with market practice in terms of assessing, measuring and managing the risks faced by the Bank.
- 3.3 The Bank follows market practice by reference to common standards of corporate governance, banking regulation and market practice in the banking industry. Additional reinforcement comes from the wider objectives of the Bank for which it wishes to deploy capital appropriately to achieve an adequate overall return on the risks borne, to support its financial sustainability, and to mitigate against potential excessive losses that would deplete its medium-term operational capacity. Sustained profitability is supported by assessing returns on a risk-adjusted basis using RAROC and by allocating net income in line with the Bank's Net Income Allocation framework, which ensures prudent and disciplined use of earnings.
- 3.4 To achieve this, the Bank puts in place checks and balances to ensure that:
- Investment decisions are not unduly influenced by business targets and that risks are fully considered to ensure that there is a good prospect of avoiding losses.
  - The build-up of any material correlated risks is identified, reviewed and where appropriate acted upon.
  - Controls are adequately designed around all material risks, robustly implemented and rigorously tested, to ensure Management is agile to act on evolving risk profiles.
- 3.5 Within the context of the Bank's overall governance structure, the Vice President, CRO is responsible for ensuring independent risk management of the Banking and Treasury exposures including corporate recovery matters, operational risk and information security, and for ensuring the review and compliance of the Bank's activities with environmental and procurement policies, as well as implementing related policy initiatives. The responsibility of the Vice President, CRO for financial controls carried out in connection with operational risks is shared with the Vice President, Finance CFO. While responsibilities for the management of conduct and integrity risk lie with OCCO, the VP CRO is expected to actively facilitate strong coordination on all matters related to these risks with OCCO.
- 3.6 The Vice President, CRO is a member of the Executive Committee and reports to the President. Furthermore, the Audit and Risk Committee of the Board of Directors regularly meets with the Vice

President, CRO without other members of management being present, on matters concerning the risk management function.

3.7 The Bank's overall framework for identification and management of risks is underpinned by:

- Shared responsibility by all staff members to identify and manage risks they incur in the course of fulfilling their responsibilities ("first line of defence"). This includes risk control activities performed within the first line of defence functions, such as peer reviews within Banking or liquidity and capital management controls operated within the Finance Vice Presidency.
- Independent, empowered and appropriately resourced "second line of defence" functions, with control responsibilities for matters falling into their areas of competence, including Risk Management, in respect of credit, market, liquidity, capital management and operational risks, the Office of the Chief Compliance Officer ("OCCO") in respect of personal conduct risks and integrity risks arising from the Bank's operations and clients (including prohibited practices, financial crime, criminal proceedings or allegations, etc.), the Environmental and Sustainability Department in respect of compliance and operational risks specifically related to environmental and social impact risks, and the Procurement Policy and Advisory Department in respect of procurement related issues.
- Internal Audit Department, which acts as "third line of defence", and independently assesses the effectiveness of the processes within the first and second lines of defence.

3.8 In discharging the duties of the role, the Vice President, CRO is supported by several departments, as well as by the Risk Committee. The Risk Committee is chaired by the Vice President, CRO. It oversees all risk-related aspects of the Banking and Treasury portfolios across all sectors and countries, and provides advice on risk management policies, measures and controls. It also approves proposals for new products submitted by Banking or Treasury. Its membership comprises senior managers across the Bank including representatives from Risk Management, Finance, Banking, the Office of the General Counsel and the OCCO.

3.9 Risk Management (i) provides an independent assessment of risks associated with individual investments undertaken by the Bank, (ii) performs an ongoing review of the portfolio to monitor the risk presented by investments from inception to repayment or exit, (iii) assesses and proposes ways to manage risks arising from correlations and concentrations within the portfolio, and (iv) ensures that adequate systems and controls are put in place for identification and management of operational risks across the Bank. Working together with other departments and units, Risk Management develops and maintains relevant policies for Banking and Treasury operations and promotes risk awareness across the Bank.

3.10 In exercising its responsibilities, Risk Management aims to:

- Provide assurance that risk taking decision making in the Bank is balanced and within the agreed appetite, and that control processes are rigorously designed and applied; and

- Support the Bank's business strategy and its execution, including the maximisation of transition impact through provision of efficient and effective risk management advice, challenge and decision-making.

- 3.11 OCCO is responsible for assisting in identifying, assessing and monitoring the integrity risks<sup>1</sup> arising from the Bank's operations and its clients and proposed clients, as well as the personal conduct risks arising from failure to comply with the Bank's Codes of Conduct, staff regulations and rules or any other obligations for Board Officials and Bank Personnel adopted by the Board of Governors, the Board of Directors, the President, or under their respective delegated authority. OCCO is also responsible for ensuring that the Bank has adopted appropriate standards on anti-money laundering; counter-terrorist financing; conflicts of interests; insider trading; prohibited practices; treatment of confidential information; and integrity and domiciliation due diligence that are in line with, or reflect, internationally accepted norms and industry practice that take due regard of the Bank's immunities and privileges.
- 3.12 In accordance with its terms of reference, the Audit and Risk Committee of the Board of Directors periodically reviews and evaluates the functions performed by the Internal Audit Department, OCCO, the Evaluation Department and Risk Management Department. The Audit and Risk Committee regularly meets with the heads of all these functions, without other members of Management being present.

<sup>1</sup> Integrity Risk Policy, Annex A (Office of the Chief Compliance Officer, Terms of Reference)

## 4. Financial Loss Tolerance Thresholds

- 4.1 Notwithstanding its strong capitalisation consistent with its triple-A (best in class among IFIs) ratings, the Bank also seeks to manage its business to avoid excessive losses and the depletion of its capital in a stressed economic environment. In particular, the Bank wishes to retain its triple-A ratings with a high degree of probability and preserve its capacity to operate countercyclically. Accordingly, a 1 in 7 Downturn scenario should not necessitate any substantial revision to the Bank's business plan.
- 4.2 The Bank adopts key warning indicators that it wishes to heed, to avoid undue loss of capital and to be able to adjust its business plan and strategy well before its triple-A ratings are in jeopardy. These thresholds highlight that risk taking is approaching the boundaries set out in the Bank's policies. Such warning signals facilitate early discussion of the approaching threats and, if appropriate, provide time to implement risk mitigating actions. They form a part of the broader business planning conversation, which is already informed by the financial performance of the Bank and the forward-looking assessment of risks to profitability included in regular reports of the Bank. They facilitate a comprehensive discussion of the Bank's business plan and consideration of the associated risks.
- 4.3 The assessment of the Bank's risk profile against the parameters is made through the Annual Bank-wide Stress Test. The test is forward-looking in nature and based on statistical analysis of the Bank's planned and evolving balance-sheet under stress scenarios, rather than on realised financial performance, or an actual balance sheet at any point in time.
- 4.4 A breach of any of the thresholds implied by the business plan set out in the annual Strategy Implementation Plan ("SIP") will prompt Management either (i) to accept the increased potential losses and elevate the thresholds accordingly or (ii) to adjust the business plan to keep the Bank's risk profile within the previously agreed parameters. This decision must be made by Management in the context of the annual approval of the Bank's SIP and disclosed to the Board as part of the process.
- 4.5 The levels of the FLTTs are expected to evolve based on (i) advances in modelling techniques and understanding of risks; (ii) changes to the external environment, including the volatility of financial markets; (iii) changes in the size and structure of the Bank's balance sheet, including e.g. size of the equity portfolio; and (iv) changes in the business plan and priorities and other relevant factors.
- 4.6 The thresholds include the Capital FLTT which is measured against the projected capital utilisation and the profit and loss FLTT ("P&L FLTT") which is measured against Net Profit and the associated change in Available Capital. Both thresholds are assessed in each given year of the stress test horizon.

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- 4.7 The Capital FLTT is designed to constrain the overall risk adjusted balance sheet growth and the purpose of the P&L FLTT is to avoid excessive net profit volatility. The level of the P&L FLTT, constrains both the level of market risk arising from equity investments in the Banking book and the level of NPL and impairment charges, thereby incentivising management action in the event of severe portfolio deterioration.
- 4.8 The thresholds are tested under two scenarios including a 1 in 7 Downturn and a 1 in 25 Severe scenario. The 1 in 7 Downturn scenario is likely to correspond to a cyclical economic slowdown or mild recession, whereas the 1 in 25 Severe scenario is likely to resemble a deep recession induced by an international financial or political event. In abstract terms, the Bank has a 1 in 7 and 1 in 25 probability of such loss levels occurring in any year of its business plan and therefore sets its Risk Appetite at these probability levels.
- 4.9 In the 1 in 7 years stress scenario, designed to replicate a cyclical downturn, Net Loss and the associated erosion in Available Capital must not exceed €1.6 billion in any single year. In the 1 in 25 years stress scenario designed to replicate a material once in a generation downturn, Net Loss and the associated erosion in Available Capital in a single year after taking into account Institutional Actions must not exceed €6.2 billion.
- 4.10 The level of the Capital FLTT is set out further below under Capital and Leverage Risk Appetite in section 5.4.

## 5. Capital, Leverage and Liquidity Risk Appetite

### Capital and Leverage Risk Appetite

- 5.1 The Bank's capital, leverage and liquidity risk appetite defines the amount of capital and liquidity to be held in support of the Bank's business operations. The minimum amounts of capital and liquidity are calibrated to ensure the Bank maintains its triple-A credit rating within the overall rating methodologies of the relevant rating agencies, under both normal and stressed economic conditions.
- 5.2 The Bank's Capital Adequacy Policy sets out the amount of capital to be held under normal economic conditions and determines required capital for debt and equity exposures within the Banking book, gross Treasury liquid assets, as well as operational risk exposure.
- 5.3 As one of the key control parameters, under normal economic conditions, the Bank manages the minimum amount of capital by ensuring that the capital utilisation ratio does not exceed a 90% prudential limit. In addition to the risk-based ratio outlined above, the EBRD also adheres to a nominal capital ratio designed to limit development related exposure (after impairment) to a maximum of 4x members equity (less paid-in capital subscribed but not yet received).
- 5.4 The Capital FLTT measures capital utilisation inherent in the SIP business plan under stressed economic conditions defined as a 1 in 7 and 1 in 25-year event. It must not exceed 100% in any given year after taking into account institutional actions in response to a crisis. This is equivalent to a drop in terms of S&P Risk Adjusted Capital ratio that could in theory allow the Bank to retain its triple-A rating from S&P if other factors, such as perceived shareholder support, business profile and liquidity, remain positive.

### Liquidity Risk Appetite

- 5.5 The minimum amount of liquidity to be held by the Bank is set out in the Treasury Authority and Liquidity Policy.
- 5.6 Given that the Bank does not have access to funding sources such as deposits or a lender of last resort, it must be able to meet its commitments in both normal and disrupted/closed financial markets for an agreed survivability period. In addition, the Bank needs to retain sufficient high-quality liquidity, so that under the rating agencies' methodologies liquidity should always be considered a strong/positive factor within the overall rating.
- 5.7 The key parameters set out in the Treasury Authority and Liquidity Policy are summarised below for ease of reference:

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- The Bank is able to meet its obligations for at least 12 months under an Extreme Stress scenario, defined as a 1 in 100-year event under the Bank's stress test methodology, without access to funding markets.
  - The Bank's liquidity position is perceived as robust by rating agencies and investors.
  - The Bank should ensure that at least 75% of the next two years' net cash flow requirements can be met, without recourse to accessing funding markets.
  - The Bank should maintain additional liquidity, to be able to step out of unfavourable markets for at least 90 days and still be in compliance with the medium-term liquidity requirements set out above. This gives the Bank the ability to opt out of a potentially expensive borrowing market and avoid having to sell long dated securities at a potential loss, without putting at risk its long-term liquidity position.

5.8 The above metrics are supplemented by more granular limits set in Management level procedures, measuring liquidity over different time horizons and at individual currency level.

## 6. Credit Risk Appetite

- 6.1 Credit risk arises in the Bank's Banking and Treasury books. As part of its Banking operation, the EBRD invests in debt, issues guarantees and provides other products to international and local clients in its Countries of Operation ("CoO"). In fulfilment of its Treasury mandate, the Bank invests into liquid, developed markets' assets predominantly at the upper end of investment grade, as well as into debt within its CoO in support of local capital market development and local currency lending.

### Banking Book

- 6.2 The Bank protects itself from undue idiosyncratic (transaction specific) credit risk related to Banking transactions by carefully selecting and structuring individual investments, including by taking security over movable and immovable assets, by accepting guarantees from companies and individuals, and by requiring a set of financial and operational covenants, as well as by imposing associated reporting obligations. Residual credit risk is further minimised by targeted use of other risk mitigation instruments, such as unfunded risk participations or various funded and unfunded forms of donor support.
- 6.3 The Bank manages systemic (correlated) credit risk by adopting portfolio limits, including country limits, to reduce the impact of adverse external events on its capital. The Bank's prudential limits covering country and single obligor Banking exposures are articulated in the Capital Adequacy Policy approved by the Board. The Bank manages exposure to individual transactions and clients by mobilising private-sector co-financiers (both on a funded and on an unfunded basis) and/or through using concessional donor funding alongside its own loans.
- 6.4 These prudential limits are supplemented by Management level operational limits as appropriate, to contain and manage concentration risk at the level of country and single obligor.
- 6.5 To identify emerging risk and enable appropriate risk mitigating actions, the Bank also conducts regular stress testing exercises and comprehensive reviews of its investment portfolios. The Bank recognises that any resulting risk mitigation is constrained by the limited geographical space and the illiquid nature of emerging markets within which the Bank operates.
- 6.6 The Bank's business planning process, encapsulated in the annual SIP, sets balanced objectives in terms of geographical, sector and product distribution of Banking activities, taking into account the level of Available Capital and the desired risk profile of the Bank set out in this Statement.
- 6.7 The Bank's credit risk profile benefits from its special status as an international financial institution, established by treaty through the AEB, and enjoying certain privileges and immunities. In addition, the Bank's preferred creditor status should provide protection against being impacted by sovereign debt treatment and currency convertibility risks.

- 6.8 Recognising that taking credit risk in Banking activities is central to the pursuit of its mandate and mission, the Bank does not impose a separate overall limit on credit risk in the Banking portfolio. The overall amount of credit and market risk in the Banking portfolio is instead controlled through capital and leverage risk parameters set out in section 5 above, with all other types of financial risks tightly constrained to maximise headroom available for the core activities.

## Treasury Book

- 6.9 Idiosyncratic and systemic credit risks related to the Treasury portfolio are managed through a comprehensive set of portfolio and counterparty level limits articulated in the Treasury Authority and Liquidity Procedures, as updated from time to time. In addition, the Bank mitigates counterparty credit risk, for example by holding collateral against exposures to derivative counterparties.
- 6.10 The Bank's Treasury has a narrowly defined set of objectives, which focus on (i) the provision and preservation of liquidity to support the Bank's business plan and operations; (ii) the management of the capital of the Bank, retained earnings and borrowed funds; and (iii) local capital market development and provision of local currency funding in the Bank's Countries of Operations. The Bank's Treasury Department seeks to satisfy minimum liquidity criteria, while maintaining appropriately low credit risk and capital consumption associated with the liquid asset portfolio.
- 6.11 Eligible Treasury counterparties and investments are normally limited to the upper end of investment grade, with the exception of counterparties approved for local currency activities in the economies where the Bank invests. These activities support the Bank's initiatives to provide local currency financing to Banking clients and to develop local capital markets.
- 6.12 The overall amount of credit risk in the Treasury book, measured by a default value at risk ("DVaR") at a one-year time horizon and 99.99% confidence level, is capped at 10% of the Bank's Available Capital. This limit is supplemented by risk adjusted counterparty and sub-portfolio limits, constraining single name exposures and various risk concentrations<sup>2</sup>.

<sup>2</sup> Alongside the DVaR measure for treasury credit risk, combined treasury credit and market risk is limited through Economic Capital which must not at any time exceed 15% of Available Capital. Economic Capital is calculated as the sum of the credit risk DVaR model and market risk Value-at-Risk model both appropriately calibrated to 99.99% confidence level and over a one-year horizon.

## 7. Market Risk Appetite

- 7.1 Market risk arises from both the Bank's Banking and Treasury books. As part of its Banking operation, the Bank is exposed to market risk from equity investments with international and local clients in its CoOs. Alongside its equity operation, the Bank is also exposed to residual market risk from imperfect hedging of assets and liabilities in terms of tenor, currency and interest rates.

### Banking Book Equity Investments

- 7.2 The Bank accepts a high level of market risk related to its Banking equity investments entered in pursuit of its strategic objectives. The Bank does not in principle directly hedge currency risk or local equity market movements. As such, these risks are a significant contributor to annual volatility in the Bank's financial results. Hybrid investments classified as equity are hedged on a case-by-case basis, as determined by Treasury.
- 7.3 Recognising that taking market risk in its Banking activities is central to the pursuit of its mandate and mission, no separate limits are imposed on the level of market risk in Banking activities. The overall amount of market and credit risk in the Banking portfolio is instead controlled through capital and leverage risk parameters set out in section 5 above, with all other types of financial risks tightly constrained to maximise headroom available for the core activities.

### Banking Debt and Treasury Book

- 7.4 The Bank seeks to maintain very low residual market risk related to its Banking loan and guarantee transactions, as well as to Treasury assets and the Bank's liabilities. This is achieved, among other things, by hedging foreign exchange and interest rate risks. Residual market risk is managed through a combination of Board and Management limits as set out in the Treasury Authority and Liquidity Policy approved by the Board and the Treasury Authority and Liquidity Procedures approved by the Risk Committee.
- 7.5 At Board level, Economic Capital for market risk i.e., overall market risk measured by an appropriately calibrated Value-at-Risk model at 99.99% confidence level and over a one-year horizon must not at any time exceed 10% of Available Capital.
- 7.6 At Management level, the maximum amount of residual market risk is measured through Expected Shortfall (eVaR) at a one-day horizon and 95% confidence interval. It is set at €60 million overall and €10 million excluding basis risk. The difference between these two levels is mainly to facilitate sourcing of local currency for Banking operations through cross-currency swaps.

## 8. Model Risk Appetite

- 8.1 The Bank utilises a wide range of models to measure and manage its financial risks. These models give rise to model risk. Model risk is the potential for financial loss or other adverse impact that an institution may incur, as a consequence of decisions that are principally based on the output of models, due to errors in the development, implementation or use of such models.
- 8.2 Model risk can lead to financial loss, poor business and strategic decisions, or damage to reputation. Model risk occurs primarily for two reasons: (i) a model may have fundamental errors and produce inaccurate outputs when viewed against its design objective and intended business uses; and (ii) a model may be used incorrectly or inappropriately or there may be a misunderstanding about its limitations and assumptions. Model risk increases with greater model complexity, higher uncertainty about inputs and assumptions, and a broadening of use.
- 8.3 The Bank puts in place risk-based controls on inputs, assumptions and modelling techniques. For models critical to financial reporting, risk compliance or investment decisions, such controls typically involve review by an independent second line of defence team within Risk Management.
- 8.4 At the same time, the Bank recognises that, in addition to the usual modelling challenges, models supporting its core Banking activity are exposed to acute uncertainty about their inputs and assumptions, exacerbated by the Bank's focus on frontier and emerging markets where reliable data remains scarce and comparators are not straightforward to select.
- 8.5 As a consequence, the Bank has an overall moderate model risk appetite, provided that data and model limitations are understood by model users and decision makers. The Bank's model risk control framework is risk based, with the level of controls depending on the criticality of the models.
- 8.6 The Model Risk Management Framework: Key Principles is the overarching document describing the Bank's approach to identifying and managing model risk across its business activities. It sets out the types of models used at the Bank, as well as defining the risk appetite and control processes used in managing model risk.

## 9. Climate Risk Appetite

- 9.1 The Bank, through its risk management framework, has an overarching ambition to manage its exposure to clients whose businesses generate material emissions that may present financial and franchise risks, while expanding its financing activities in areas that support green transition. Moreover, the Bank supports commitments made by the governments of its Countries of Operations and clients pursuing alignment with the goals of the Paris agreement.
- 9.2 As part of its Green Economy Transition 2030 Strategy, the Bank has committed to ensuring that at least 50% of its total annual investments will meet its Green Economy Transition criteria, and that all of its activities are aligned with the goals of the Paris Agreement from 01 January 2023. In addition, under its Energy Sector Strategy 2024-28, the Bank has ended its interest in new investments in upstream oil and gas exploration and extraction, which matches its earlier decision to desist from financing coal extraction activities. These factors support the management of climate risk.
- 9.3 Following several years of TCFD aligned disclosures, the Bank progressed its commitment to report under the ISSB framework. In this context, the Bank continues to develop and further advance its methodologies and processes required to meet external assurance and evolving market expectations. As part of this broader effort, work is under way to strengthen the Bank's capabilities to quantify its climate-related credit risk, which essentially reflects the potential financial losses arising from exposures to physical climate risks (e.g. flood, fire, drought etc) as well as carbon transition risks (e.g. carbon credit pricing, aviation taxes etc).
- 9.4 Climate-related reputational risk which may be triggered by the Bank's exposures and engagement with carbon-intensive sectors (e.g. coal production, coal fired electricity generation, upstream oil and gas exploration and production) will continue to be analysed and monitored.
- 9.5 The Bank anticipates that in line with industry developments and expectations, these methodologies, once rigorously tested, will, in the future, help define its risk appetite in a quantitative manner. In the near term, the Bank will continue to refine its stress testing approaches and assess the potential implications for capital and financial outcomes. This work is expected to provide a basis for considering whether, and to what extent, further adjustments to the Bank's risk appetite and strategic direction may be appropriate.

## 10. Operational and Reputational Risk Appetite

- 10.1 The EBRD treats operational risk as an inevitable consequence of the activities, processes and relationships that are inherent to a multilateral development bank and seeks to minimise its exposure to significant operational risk losses and reputational damage through the maintenance of effective internal practices and controls.
- 10.2 EBRD, as a multilateral development bank that promotes the development of the private sector and entrepreneurial initiative, can differentiate itself from a traditional banking institution and should expect a relatively low volume of operational risk incidents. However, as a publicly funded organisation, with a political mandate enshrined in its founding documents, publicised policy objectives, and operating in inherently risky environments, the EBRD is subject to greater public scrutiny and therefore is exposed to higher levels of adverse reputational impact. As such and in combination with the mitigation activities the EBRD has a low appetite for operational risk related financial losses and reputational damage and seeks to minimise circumstances that could substantially weaken stakeholder confidence and undermine its mission.
- 10.3 For this reason, it considers adverse reputational impact as a stand-alone risk type to be managed and minimised within its Operational Risk Management Framework together with a number of other interrelated operational risks types, which are further specified with risk appetite statements and indicative key risk indicators.
- 10.4 The Bank's current interrelated operational risk types include:
- Reputational Risk: risk that the Bank's stakeholders, its Countries of Operation and/or the communities in which it operates, lose confidence and respect for the EBRD and its ability to achieve its mission, resulting in an adverse effect on the Bank's ability to carry out its mandate in accordance with the AEB or on its ability to maintain existing, or establish new, business relationships and/or access to funding. Reputational Risks may also arise as a consequence of any other type of operational risk;
  - Business Resilience Risk: Disruptions to Bank activities and operations caused by unavailability of systems, workforce or workplace;
  - Change Management Risk: Negative consequences that can arise from implementing a change initiative, including impact of change on people, business disruption, and failure to manage the delivery of projects and programmes;
  - Personal Conduct Risk: misconduct by staff and/or Board Officials;
  - Third Party Fraud and Conduct Risk: Inappropriate conduct or actions by third parties, that defraud, misappropriate property or circumvent regulations, law or Bank policies or procedures, or which (in the case of third parties) give rise to unacceptable integrity risk for the Bank;
  - People Risk: Risk that the capacity, productivity, wellbeing, hiring, or retention of our staff are compromised;

- Information Security and Cyber Risk: Risk that the confidentiality, integrity, authenticity and/or availability of a given information asset is adversely impacted or the compromise of Bank systems due to a digital event(s) caused by threat actors or third parties;
- Legal Risk: A risk of loss to EBRD or to its reputation that is primarily caused by (i) a defective transaction, (ii) a claim (including a defence to a claim or counterclaim) being made or some other event occurring that results in a liability for EBRD or other loss, or (iii) failing to take appropriate measures to protect EBRD's assets, privileges and immunities, or preferred creditor status, and failing to comply with EBRD's constituent documents or (iv) a change in law (where applicable or relevant);
- Physical Security and Health and Safety Risk: Risk that events or circumstances that could potentially compromise the Bank's physical assets and the health and safety of its staff, contractors, and visitors;
- Process Execution Risk: Risk of loss due to failure of significant business processes; undertaken by EBRD, including for example critical transaction and payments processing, donor administration, financial reporting, mandate compliance, client suitability checks, reference data and asset pricing;
- Product Risk: Risk associated with product complexity, underperformance relative to objectives, client unsuitability, and operational capacity constraints for product execution and management;
- Technology Risk: Risk that the Bank's technology systems and support are inadequate or fail to adapt to changing requirements;
- Third Party Vendor Risk: Risk that third party vendors may not be able to meet their agreed service level terms that can result in business disruption, misuse of data, or create a negative impact on business performance.

10.5 All business functions consider a balanced approach to their risks and controls, employ sound risk management principles, transparent decision-making, and effective communication to prioritise risk. In case a residual risk is assessed to be outside the Bank's risk appetite, where appropriate, additional risk reducing actions are undertaken including further remediating risks. On an exceptional basis, the Bank is willing to assume more risk to remain agile in meeting the challenges of an evolving business, political and banking landscape.

## 11. Pension Risk Appetite

- 11.1 The Bank has two retirement plans to help eligible staff members build up funds for their retirement. These are the Money Purchase Plan ("MPP") which provides a benefit to plan participants based on the value of their accumulated fund, adjusted in line with investment returns, and the Final Salary Plan ("FSP") which provides a benefit based on a final gross base salary and length of service. Both the FSP and MPP are designed to pay lump sum benefits.
- 11.2 There are three committees that govern the retirement plans, namely the Retirement Plan Committee, the Retirement Plan Administration Committee and the Retirement Plan Investment Committee. The latter two are appointed by the Retirement Plan Committee.
- 11.3 The Retirement Plan Committee has overall responsibility for carrying out the rules of the two retirement plans and decides on all matters of a general policy nature relating to the plans. The Retirement Plan Administration Committee is responsible for the administration of the plans, including the maintenance of records and the Retirement Plan Investment Committee directs the management and the investment of the assets of the plans (this includes determining the investment strategy of the FSP and determining the funds available for participants to invest in within the MPP).
- 11.4 The FSP is a defined benefit plan which exposes the Bank to pension risk<sup>3</sup>, defined as the risk of having to meet an actuarially assessed shortfall in the plan. If the value of the FSP assets is less than the liabilities, the Retirement Plan Committee decides if a recovery plan should be put in place. In the event the FSP assets are estimated to have fallen below 90 per cent of the defined benefit obligation, the Bank would be expected to make additional contributions to restore the funding of the plan to at least 90 per cent as soon as possible.
- 11.5 The Bank evaluates the impact from pension risk on its capital adequacy and net profit under a range of scenarios as part of its annual Bank-wide Stress Test<sup>4</sup>. It seeks a balanced investment strategy which minimises the risk of an overall reduction in the value of the FSP assets relative to its obligations and therefore expects any contributions under stress to be of low materiality.

<sup>3</sup> As final salary plans expose banks to potential funding shortfalls arising from actuarially assessed defined-benefit obligations, regulatory authorities classify all defined benefit arrangements as giving rise to pension risk, irrespective of whether the ultimate benefit is paid as a pension or a lump sum.

<sup>4</sup> From 2024, annual Bank-wide Stress Tests will invariably include the impact from pension risk in the stress test results, irrespective of materiality.

## Annex 1: Glossary of Terms

**Available Capital:** The Bank's Available Capital is equivalent to Total Members' equity, as disclosed in the Bank's financial statements, but considers cash received from general capital increases rather than share subscriptions and is adjusted for approved but not yet drawn down Net Income Allocations.

**Bank-wide Stress Test:** Statistical top-down stress test covering all elements of the Bank's balance sheet and activity. It is based on statistical models of the Bank's assets and liabilities and informed by historical trends and patterns in the underlying data, including default experience and market movements.

**Cyclical Downturn:** A hypothetical adverse stress test scenario equivalent to the worst year in a typical 7-year business cycle. In statistical terms, it is likely to occur in any year with a likelihood of 1:7.

**Extreme Stress:** A hypothetical adverse stress test scenario equivalent to a substantial widespread global depression. In statistical terms, it is likely to occur in any year with a likelihood of 1:100.

**Financial Loss Tolerance Threshold:** The maximum amount of losses, as measured by net earning under IFRS accounting standards, and the maximum increase in capital utilisation, as measured by the Capital Adequacy Policy, that the organisation is willing to tolerate under a given Bank-wide Stress Test scenario.

**ISSB:** International Sustainability Standards Board

**Net Profit or Loss:** Net loss or profit for the year arising from continuing operations as defined by the International Financial Reporting Standards. Net Profit or Loss is considered before any net income transfers to other purposes approved by the Board of Governors.

**Risk Appetite:** The aggregate level and types of risk that an institution is willing to accept, or to avoid, in order to achieve its business objectives. It normally covers liquidity and reputation risks, as well as risks to capital and profitability.

**Risk Appetite Statement:** The articulation in written form of Risk Appetite. It normally includes qualitative statements and quantitative measures expressed relative to earnings, capital, risk measures, liquidity and other relevant measures as appropriate.

**Severe Stress:** A hypothetical adverse stress test scenario equivalent to a material non-systemic crisis. In statistical terms, it is likely to occur in any year with a likelihood of 1:25.

**TCFD:** Task Force on Climate-related Financial Disclosures

## Annex 2: Risk Taxonomy and Risk Appetite Related Metrics and Controls

| <b>Risk type:</b><br>Capital, leverage and liquidity risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                              |            |                                                                                                                   |                                                    |                                                         |
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| <b>Definition:</b><br><b>Capital and leverage risks</b> result from the Bank's vulnerability to unexpected losses depleting its capital base. This could be the result of higher risk investments or excessive leverage which may require unintended corrective measures to its business and/or capital plan such as curtailment of new business, distressed selling of assets or issuance of additional capital to remain solvent.<br><b>Liquidity risk</b> is defined as the risk of failing to maintain sufficient Treasury liquid resources to meet obligations as they fall due or access these resources only at excessive costs. |                                                                                                                                                                                              |            |                                                                                                                   |                                                    |                                                         |
| <b>Risk appetite articulation:</b><br>Preserve capital and liquidity structure consistent with AAA credit rating as well as ability to meet commitments under normal and stressed economic environment.                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                              |            |                                                                                                                   |                                                    |                                                         |
| Control area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Purpose                                                                                                                                                                                      | Authority  | Metric or assessment basis                                                                                        | Limit, threshold definition or acceptance criteria | Document reference                                      |
| Capital (risk-based measure)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Aims to ensure that the Bank's standalone balance sheet strength would be in high categories of capital levels as measured by rating agencies to support a triple-A rating (principally S&P) | Board      | CAP utilisation, Required Capital in % Available Capital                                                          | Prudential limit                                   | Capital Adequacy Policy                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                              | Management | Stressed CAP utilisation Required Capital in % of Available Capital under Downturn and Severe                     | Capital FLTT                                       | Risk Appetite Statement                                 |
| Leverage (or nominal capital ratio)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Avoid excessive growth                                                                                                                                                                       | Board      | Operating Assets plus guarantees extended by the Bank net of total impairment as a multiple of Available Capital. | Limit                                              | Capital Adequacy Policy Strategic and Capital Framework |
| Liquidity risk short term                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Ensure sufficient cash inflows                                                                                                                                                               | Board      | Cash inflows in % of cash outflows for a 30                                                                       | Standard minimum ratio                             | Treasury Authority and Liquidity                        |

|                            |                                                                                     |            |                                                                                                                            |                         |                                                      |
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|                            | from maturing assets to meet cash outflows without resource to market or asset sale |            | and 90 day time horizon                                                                                                    |                         | Policy & Procedures                                  |
| Liquidity risk medium term | Meet medium term cash requirements with limited recourse to funding markets         | Board      | Net treasury liquid assets in % of 2-year net cash outflow, without access to funding markets                              | Standard minimum ratio  | Treasury Authority and Liquidity Policy & Procedures |
| Liquidity risk one year    | Proxy S&P 1 year stressed ratio                                                     | Management | Liquid assets in % of 12 months net cash outflow plus 50% undrawn commitments and 100% of guarantees extended by the Bank  | Standard minimum ratio  | Treasury Authority and Liquidity Policy & Procedures |
|                            | Preserve sufficient liquidity under stressed economic conditions                    | Management | Stressed net cash outflow relative to net Treasury liquid assets under Extreme scenario, without access to funding markets | Minimum survival period | Treasury Authority and Liquidity Policy & Procedures |

**Risk type:**

Banking credit risk

**Definition:**

Banking credit risk is defined as the potential loss to a portfolio that could result from either the default of a counterparty or the deterioration of its creditworthiness. Credit risk can be driven by client-specific risk factors, systemic risk factors such as related to the economic sector or country, as well as credit concentrations.

**Risk Appetite articulation:**

The Bank is willing to accept higher levels of credit risk from engaging with the private and public sector of less developed countries in pursuit of its strategic objectives. The Bank protects itself from undue idiosyncratic and systemic credit risk by careful structuring of deals and by adopting a variety of limits.

| Control area            | Purpose                      | Authority | Metric or assessment basis | Limit, threshold definition or acceptance criteria | Document reference     |
|-------------------------|------------------------------|-----------|----------------------------|----------------------------------------------------|------------------------|
| Single transaction non- | Balance strategic objectives | Board     | Nominal investment amount  | Limit applies to the overall investment            | Banking Credit Process |

|                                                               |                                                           |            |                                                                                                                                    |                                                                                                  |                                              |
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| sovereign and sovereign exposure limit                        | with risk considerations                                  | Management | Nominal investment (on transactions with delegated authority from the Board)                                                       | amount for each transaction.                                                                     |                                              |
| Single obligor non-sovereign and sovereign concentration risk | Ensure Bank is not overly concentrated to large exposures | Board      | Nominal and RC based<br><br>Nominal: Portfolio amount in % of AC with Portfolio incl. FV for equity<br><br>RC based: RC in % of AC | Prudential limit: Limit applied to non-sovereign exposures at different client hierarchy levels. | Capital Adequacy Policy                      |
|                                                               |                                                           | Management | Nominal amount: Portfolio incl. FV for equity                                                                                      | Limit depends on PD rating. Applied at different client hierarchy levels.                        | Banking Credit Concentration Limit Framework |
| Country concentration risk                                    | Ensure Bank is not overly exposed to any single country   | Board      | RC based: RC in % of AC                                                                                                            | Prudential limit: Limit set depending on size of country measured in GDP                         | Capital adequacy policy                      |
|                                                               |                                                           | Management | RC based: RC in % of AC                                                                                                            | Standard limit                                                                                   | Banking Credit Concentration Limit Framework |

| <b>Risk type:</b><br>Treasury credit risk                                                                                                                                                                                                                                                                                                                     |                                                                                  |            |                                                                                                                                                                                         |                                                      |                                                      |
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| <b>Definition:</b><br>Treasury credit risk arises from the potential default of a counterparty to the Bank's Treasury investments in deposits or bonds. It also comprises counterparty risk resulting from transactions with bilateral risk of loss including OTC derivatives, repurchase and reverse repurchase agreements and long settlement transactions. |                                                                                  |            |                                                                                                                                                                                         |                                                      |                                                      |
| <b>Risk appetite articulation:</b><br>The Bank seeks to maintain low levels of credit risk associated with its liquid asset portfolio. A high portfolio quality is maintained through a set of individual and portfolio limits.                                                                                                                               |                                                                                  |            |                                                                                                                                                                                         |                                                      |                                                      |
| Control area                                                                                                                                                                                                                                                                                                                                                  | Purpose                                                                          | Authority  | Metric or assessment basis                                                                                                                                                              | Limit, threshold definition or acceptance criteria   | Document reference                                   |
| Counterparty eligibility criteria and single exposure concentrations                                                                                                                                                                                                                                                                                          | Limit risk concentrations to individual counterparties, countries and sovereigns | Management | PFE credit exposure                                                                                                                                                                     | Limits are set depending on tenor and PD rating      | Treasury Authority and Liquidity Policy & Procedures |
| Portfolio risk                                                                                                                                                                                                                                                                                                                                                | Limit overall and sub portfolio credit risk                                      | Board      | Default VaR for overall liquid asset portfolio, measured at a 99.99% confidence level and 1 year time horizon                                                                           | Default VaR limit set in % of AC                     | Treasury Authority and Liquidity Policy & Procedures |
|                                                                                                                                                                                                                                                                                                                                                               |                                                                                  | Management | Peak PFE for various sub portfolios (ABS, Corporate, etc.)                                                                                                                              | Standard limits for sub-portfolio PFE                |                                                      |
|                                                                                                                                                                                                                                                                                                                                                               |                                                                                  | Management | Nominal amount for repo/reverse repo and long settlement transactions (non-delivery vs payment)                                                                                         | Limits depending on internal PD rating               |                                                      |
| Portfolio risk                                                                                                                                                                                                                                                                                                                                                | Limit overall and sub portfolio credit and market risk <sup>5</sup>              | Board      | Economic Capital calculated as the sum credit risk DVaR model and market risk Value-at-Risk model both appropriately calibrated to 99.99% confidence level and over a one-year horizon. | Economic Capital Limit set in % of Available Capital | Treasury Authority and Liquidity Policy & Procedures |

<sup>5</sup> While Economic Capital is listed under Treasury Credit Risk, its purpose is to limit combined Treasury Credit and Market Risk.

| <b>Risk type:</b><br>Market risk                                                                                                                                                                                                                                                                                                                                                                              |                                                               |            |                                                                                             |                                                                                    |                                             |
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| <b>Definition:</b><br>Market risk is defined as the potential for loss due to adverse changes in financial market rates or prices. It can arise from changes in interest and FX rates, credit spreads, as well as equity and commodity prices.                                                                                                                                                                |                                                               |            |                                                                                             |                                                                                    |                                             |
| <b>Risk appetite articulation:</b><br>The Bank allows only for minimal residual FX and interest rate risk from overall Banking and Treasury operations. Treasury hedges mismatches arising from assets and liabilities in terms of tenor, currency and interest rates by derivative instruments.<br><br>The Bank is willing to accept equity risk in the Banking book in pursuit of its strategic objectives. |                                                               |            |                                                                                             |                                                                                    |                                             |
| Control area                                                                                                                                                                                                                                                                                                                                                                                                  | Purpose                                                       | Authority  | Metric or assessment basis                                                                  | Limit, threshold definition or acceptance criteria                                 | Document reference                          |
| FX and interest rate risk in Banking and Treasury book (assets and liabilities)                                                                                                                                                                                                                                                                                                                               | Ensure market risk excluding equity risk is kept to a minimum | Board      | Economic Capital calculated as VaR at a 99.99% confidence level and over a one-year horizon | VaR limit set in % of AC                                                           | Treasury Authority and Liquidity Policy     |
| FX and interest rate risk in Banking and Treasury book (assets and liabilities)                                                                                                                                                                                                                                                                                                                               | Ensure market risk excluding equity risk is kept to a minimum | Management | Expected Shortfall (eVaR) measured at 95% confidence level and 1 day time horizon           | Limits defined overall and for a variety of risk factors such as basis risk and FX | Treasury Authority and Liquidity Procedures |

| <b>Risk type:</b><br>Model risk                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |            |                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                  |
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| <b>Definition:</b><br>Model risk is the potential for financial loss or other adverse impacts that an institution may incur, as a consequence of decisions that are principally based on the output of models, due to errors in the development, implementation or use of such models. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |            |                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                  |
| <b>Risk appetite articulation:</b><br>The Bank is seeking to identify, assess, manage, report and track its exposure to model risk.                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |            |                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                  |
| Control area                                                                                                                                                                                                                                                                           | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Authority  | Metric or assessment basis                                                                                                                                                                                               | Limit, threshold definition or acceptance criteria                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Document reference                                                                                                               |
| Models used in the Bank                                                                                                                                                                                                                                                                | <p>Model risk can lead to financial loss, poor business and strategic decisions, or damage to reputation. Model risk occurs primarily for three reasons:</p> <ol style="list-style-type: none"> <li>1) A model may be implemented incorrectly and/or have fundamental errors leading to inaccurate outputs when viewed against its design objective and intended business uses. The incorrect implementation may happen both at the development and the production stages.</li> <li>2) A model may theoretically be sound and implemented correctly but use inconsistent inputs and, as a consequence, lead to inaccurate results.</li> <li>3) A model may be used incorrectly or inappropriately due</li> </ol> | Management | <p>Each model within the model inventory is classified into risk tiers: "Low Risk", "Medium Risk" and "High Risk". A Bank-wide risk metric is computed which allows for the measurement of model risk at Bank level.</p> | <p>The model risk of each model within the model inventory follows a scorecard-based approach. The Bank-wide risk metric is directly linked to the individual model risk tiers:</p> <ol style="list-style-type: none"> <li>1) A "High Risk" rating is assigned whenever the percentage of models in the inventory having a "High Risk" tier is greater or equal to 25%. This threshold is consistent with the 75% percentage "High Risk" threshold of the underlying model risk tiering methodology.</li> <li>2) A "Moderate Risk" rating is assigned whenever the percentage of models in the inventory having a "High Risk" tier is smaller than 25% and the percentage of models in the inventory having a "Medium Risk" tier</li> </ol> | Model Risk Management<br>FW: Key Principles<br>Model validation<br>Procedures<br>Model Risk Tiering and<br>Bank-wide Risk Metric |

|  |                                                                                                                                                                                                                                         |  |  |                                                                                                                                                                                            |  |
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|  | to a misunderstanding about its original limitations and assumptions, it possibly becoming obsolete over time or, more generally, uncertainty around parameter estimates and sensitivity to changes in the inputs, data or environment. |  |  | is above or equal to 25%. These thresholds are consistent with “Medium Risk” thresholds of the underlying model risk tiering methodology.<br>3) A “Low Risk” rating is assigned otherwise. |  |
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| Risk type:<br>Climate risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |            |                                                 |                                                                                                                                                             |                                                 |
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| <b>Definition:</b><br>Climate-related financial risk is characterized as the potential risk of financial loss impacting the Bank's clients and the sustained willingness of stakeholders to provide the necessary resources. This risk can affect a client's creditworthiness, repayment capacity of bank loans, or the valuation of the Bank's equity investments as a result of climate change and the Bank's ability to meet its commitments.                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |            |                                                 |                                                                                                                                                             |                                                 |
| <b>Risk appetite articulation:</b><br>The Bank acknowledges climate-related financial risk as an inherent aspect of its operations and strives to mitigate significant financial losses and reputational damage through internal practices and controls. The Bank seeks to identify, assess, manage, report and track its exposures to climate risk and opportunities. Given data and the lack of standardized approaches, the Bank more regularly reviews and reassesses its methods as new market practices and information emerge. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |            |                                                 |                                                                                                                                                             |                                                 |
| Control area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Authority  | Metric or assessment basis                      | Limit, threshold definition or acceptance criteria                                                                                                          | Document reference                              |
| Climate related financial risks - Physical Climate Risk and Carbon Transition Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1) Identify climate-related financial risks across short, medium, and long-term horizons.<br><br>2) Manage these risks through robust strategies and practices.<br><br>3) Report on climate risk exposure and management of stakeholders.<br><br>4) Inform investment decisions and strategic planning by considering the prospective impacts of climate risks.<br><br>This approach ensures a sound understanding and handling of climate risks, aligning with our commitment to sustainability and financial resilience. | Management | Counterparty screening scores on a scale of 1-5 | All counterparties are reviewed and screened for climate related financial risk with further assessment applied to those screened as potentially high risk. | Climate risk Policies, Procedures and Guidance. |

| <b>Risk type:</b><br>Operational and reputational risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                          |           |                                                    |                                                                                                                                                                                                                                                                                    |                                                                                                                                           |
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| <b>Definition:</b><br>Operational risk is the risk of financial loss and reputational impact due to inadequate or failing processes, people, systems and / or external events.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                          |           |                                                    |                                                                                                                                                                                                                                                                                    |                                                                                                                                           |
| Reputational risk is the risk that the Bank's stakeholders, its Countries of Operation and/or the communities in which it operates, lose confidence and respect for the EBRD and its ability to achieve its mission, resulting in an adverse effect on the Bank's ability to carry out its mandate in accordance with the AEB or on its ability to maintain existing, or establish new, business relationships and/or access to funding.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                          |           |                                                    |                                                                                                                                                                                                                                                                                    |                                                                                                                                           |
| <b>Risk appetite articulation:</b><br><p>The EBRD treats operational risk as an inevitable consequence of the activities, processes and relationships that are inherent to a multilateral development bank and seeks to minimise its exposure to significant operational risk losses and reputational damage through the maintenance of effective internal practices and controls.</p> <p>The EBRD, as a multilateral bank that promotes the development of the private sector and entrepreneurial initiative, can differentiate itself from a traditional banking institution and should expect a relatively low volume of operational risk incidents. However, as a publicly funded organisation, with a political mandate enshrined in its founding documents, publicised policy objectives, and operating in inherently risky environments, the EBRD is subject to greater public scrutiny and therefore is exposed to higher levels of adverse reputational impact. As such and in combination with the mitigation activities the EBRD has a low appetite for operational risk related financial losses and reputational damage and seeks to minimise circumstances that could substantially weaken stakeholder confidence and undermine its mission.</p> <p>On an exceptional basis, the Bank is willing to assume more risk to remain agile in meeting the challenges of an evolving business, political and banking landscape.</p> |                                                                                                          |           |                                                    |                                                                                                                                                                                                                                                                                    |                                                                                                                                           |
| Control area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Purpose                                                                                                  | Authority | Metric or assessment basis                         | Limit, threshold definition or acceptance criteria                                                                                                                                                                                                                                 | Document reference                                                                                                                        |
| Fraud and Conduct – personal conduct risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Protect reputation of the Bank by ensuring high standards of integrity by all staff and Board Officials. | Board     | Information provided on staff and Board Officials. | Personal conduct related risks are addressed by establishing, communicating, monitoring, and implementing a clear set of rules regarding the required ethical conduct of Bank Personnel and Board Officials, and by taking appropriate corrective action in the event of a breach. | Codes of Conduct for Bank Personnel and Board Officials<br><br>Conduct and Disciplinary Rules and Procedures<br><br>Whistleblowing Policy |
| Fraud and Conduct – third party                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Protect reputation of the Bank by ensuring                                                               | Board     | Information provided on clients,                   | All individuals and entities that are relevant to a project,                                                                                                                                                                                                                       | Integrity Risk Policy                                                                                                                     |

|                                                        |                                                                                                                     |       |                                                                                                            |                                                                                                                                                                                                                                                                                                                                                  |                                                                                                |
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| related integrity risk                                 | high standards of integrity in all its business operations.                                                         |       | sponsors and other counterparties.                                                                         | including, for example, the client, sponsor, shareholders and other key parties, must be subject to integrity checks (pursuant to the Integrity Due Diligence Manual) to assess potential Integrity Risk. Higher risks are subjected to increased levels of scrutiny. Rejection of projects that expose the Bank to unacceptable integrity risk. | Operational Risk Policy<br>Enforcement Policy and Procedures<br>Integrity Due Diligence Manual |
| Fraud and Conduct – procurement related integrity risk | Protect reputation of the Bank from unfair, non-transparent or discriminatory Bank or client procurement practices. | Board | Information on details of transaction and/or procurement strategy                                          | Check against a variety of acceptance criteria. Under the Procurement Policies and Rules, for public sector operations, contracts shall normally be procured following Open Competitive Procedures.                                                                                                                                              | Procurement Policies and Rules<br>Operational Risk Policy                                      |
| Environmental and social risk <sup>6</sup>             | Ensure the Bank achieves the requirements of its Environmental and Social Policy.                                   | Board | Information provided by clients on potential environmental and social impacts of projects on stakeholders. | Check of information against a set of Environmental and Social Requirements (ESR's) for key areas of environmental and social sustainability that projects are expected to meet. Remedial action plan to be implemented by clients in case of failure to meet requirements. Rejection of projects that expose the Bank to unacceptable           | Environmental and Social Policy<br>Operational Risk Policy                                     |

<sup>6</sup> Environmental and social risk, previously considered as part of "Fraud & Conduct" due to its potential harmful impacts, spans multiple risk categories. While not a primary Operational Risk category, it remains here for completeness due to the reputational impact and various operational risk factors.

|                          |                                                                                                                                                                                                                                    |       |                                                                                                                                                                                       |                                                                                                                                                                                                        |                                                                                                                                                                                                                                              |
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|                          |                                                                                                                                                                                                                                    |       |                                                                                                                                                                                       | environmental and social risks.                                                                                                                                                                        |                                                                                                                                                                                                                                              |
| Legal risk               | Protect the Bank from defective transactions, claims and liabilities, non-compliance with its constituent documents and changes in law, and from compromising its assets, privileges and immunities, or preferred creditor status. | Board | Legally relevant information on clients, projects, products and policy decisions                                                                                                      | Control system that promotes compliance with legal requirements and uses internal and external legal counsel as both a safeguard against unlawful actions and a resource for informed decision-making. | AEB and other policies guiding the Bank's operations                                                                                                                                                                                         |
| Business Resilience Risk | Protect the Bank from disruption to its activities and operations caused by unavailability of IT systems and staff, unviability of external suppliers / third parties and impact from external events.                             | Board | Completeness and coverage of risk and control assessments. Effectiveness of the control environment. Number of Issue resolution overdue Number of internal incidents. Audit findings. | Variety of limits and acceptance criteria                                                                                                                                                              | Operational Risk Management Policy<br>Informational Security Policy<br>Code of Conduct<br>Integrity Risk Policy<br>Environmental and Social Policy<br>Procurement Policies and Rules<br>AEB and other Policies guiding the Bank's operations |
| Change Risk              | Protect the Bank from potential of negative impact from change projects and that ineffective project implementation could lead to sub-optimal solution.                                                                            | Board |                                                                                                                                                                                       |                                                                                                                                                                                                        |                                                                                                                                                                                                                                              |
| People Risk              | Protect the Bank from sub-optimal performance caused by insufficient level of staff or failure to attract adequately skilled employees.                                                                                            | Board |                                                                                                                                                                                       |                                                                                                                                                                                                        |                                                                                                                                                                                                                                              |

|                                            |                                                                                                                                                                                             |       |  |  |  |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--|--|--|
| Information Security & Cyber Risk          | Protect the Bank from compromising confidentiality, integrity, accuracy and/or availability of information assets or systems.                                                               | Board |  |  |  |
| Physical Security and Health & Safety Risk | Protect the Bank from adverse impact due to threats to staff health and safety, as well as to assets and infrastructure.                                                                    | Board |  |  |  |
| Process Execution Risk                     | Protect the Bank from failure of key business processes.                                                                                                                                    | Board |  |  |  |
| Product Risk                               | Protect the Bank from risk arising due to product complexity, as well as choice of products that prove unsuitable or do not meet performance objectives.                                    | Board |  |  |  |
| Technology Risk                            | Protect the Bank from threat that technology systems and support become inadequate or fail to adapt to changing requirements.                                                               | Board |  |  |  |
| Third Party Vendor Risk                    | Protect the Bank from risks related to the use of service providers and suppliers that could result in business disruption, misuse of data, or have adverse impact on business performance. | Board |  |  |  |

| <b>Risk type:</b><br>Pension risk                                                                                                                                                                                                                       |                                                                                                              |            |                                       |                                                                  |                                                                            |
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| <b>Definition:</b><br>Pension risk is defined as the risk of having to meet an actuarially assessed shortfall in the Bank's defined benefit retirement plan                                                                                             |                                                                                                              |            |                                       |                                                                  |                                                                            |
| <b>Risk appetite articulation:</b><br>The Bank is seeking a balanced investment strategy which minimises the risk of an overall reduction in the value of the FSP assets and maximises the opportunity for gains across the whole investment portfolio. |                                                                                                              |            |                                       |                                                                  |                                                                            |
| Control area                                                                                                                                                                                                                                            | Purpose                                                                                                      | Authority  | Metric or assessment basis            | Limit, threshold definition or acceptance criteria               | Document reference                                                         |
| Investment risk                                                                                                                                                                                                                                         | Limit the risk of a fall in asset values not matched by similar falls in the value of the plan's liabilities | Management | Actuarial projection and risk metrics | Review performance of all of the funds against their benchmarks. | Rules of the Final Salary Plan<br><br>EBRD FSP and MPP Report and Accounts |

## Risk Appetite Statement

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