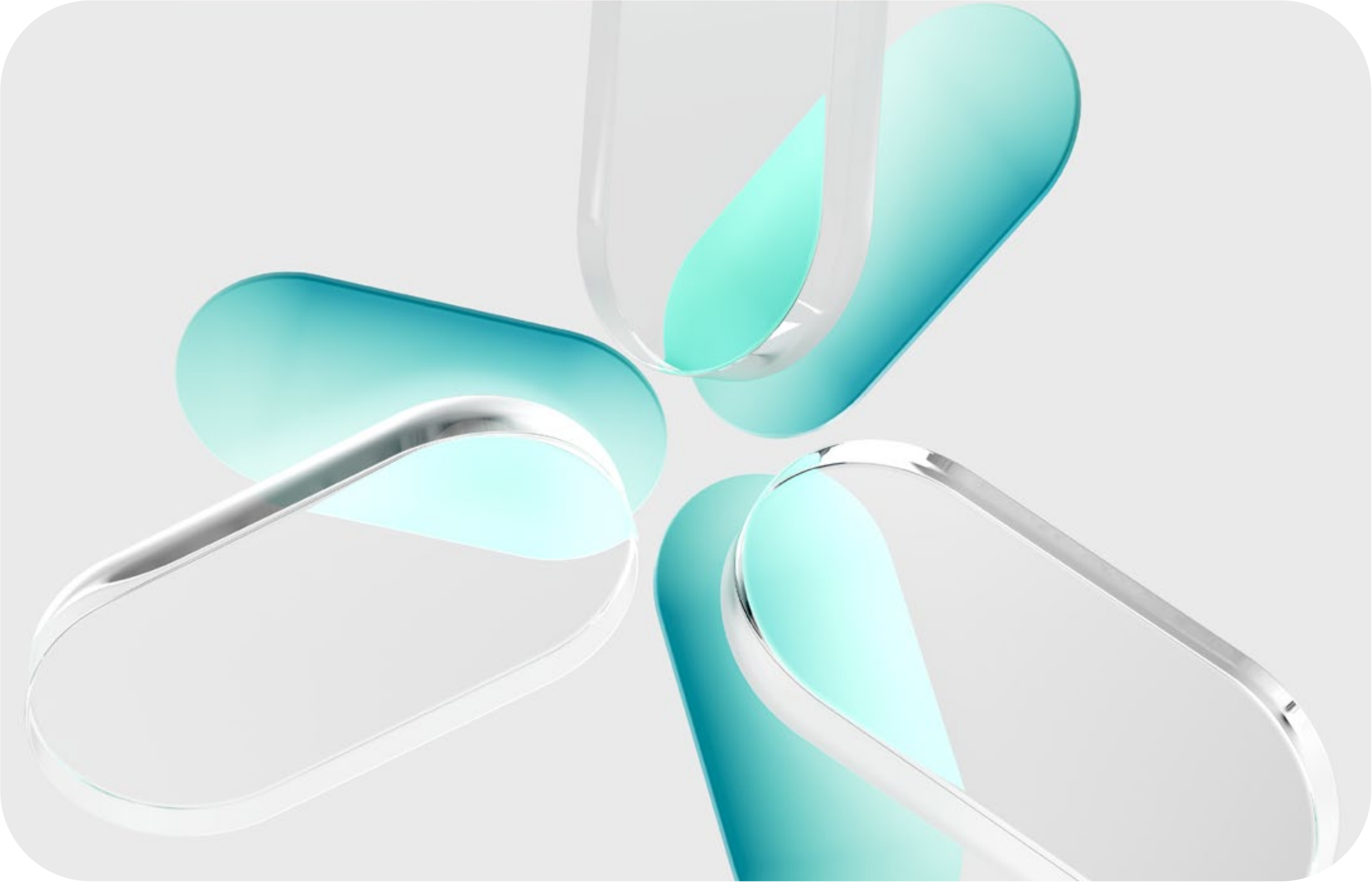
Clear.Bank

Pillar 3 Disclosure
2022



Unlocking potential

Our purpose
At ClearBank, our purpose is to provide great technology that unlocks our clients' potential, ensuring everyone has the freedom to choose the financial services they need.

Our vision
We are committed to being a responsible business, driving forward the transformation of payment services. Our technology platform and banking licence enable our clients to thrive by providing access to next generation financial solutions.

Why
For decades, the clearing of financial transactions remained unchanged and unchallenged. We asked: "What if there was a better way? What if we could make those transactions faster, safer, more reliable and accessible to all?"

Our business at a glance
Using our next generation financial solutions to transform the UK clearing and payment services landscape, and beyond. Enabling clients to unlock their potential.

Who we are
ClearBank is a purpose built, technology enabled clearing bank. We were built on the belief that banking and payments infrastructure should no longer slow down innovators in the market. Instead, it's the catalyst that unlocks the potential to innovate. That's why our clients leverage our API to power their banking infrastructure and provide best-in-class service for their customers, allowing the business to stay relevant in a fast paced market.

What we do
Through our banking licence and innovative financial technology, we enable financial institutions to offer secure accounts, clear payments in real-time and enhance their banking propositions with embedded banking for their customers. As such, we are committed to being a responsible business, driving forward the transformation of payment services.

Who our clients are
Financial institutions — from fintechs and crypto platforms, to banks and credit unions — use our API to offer their customers fully regulated banking infrastructure and real-time clearing access.

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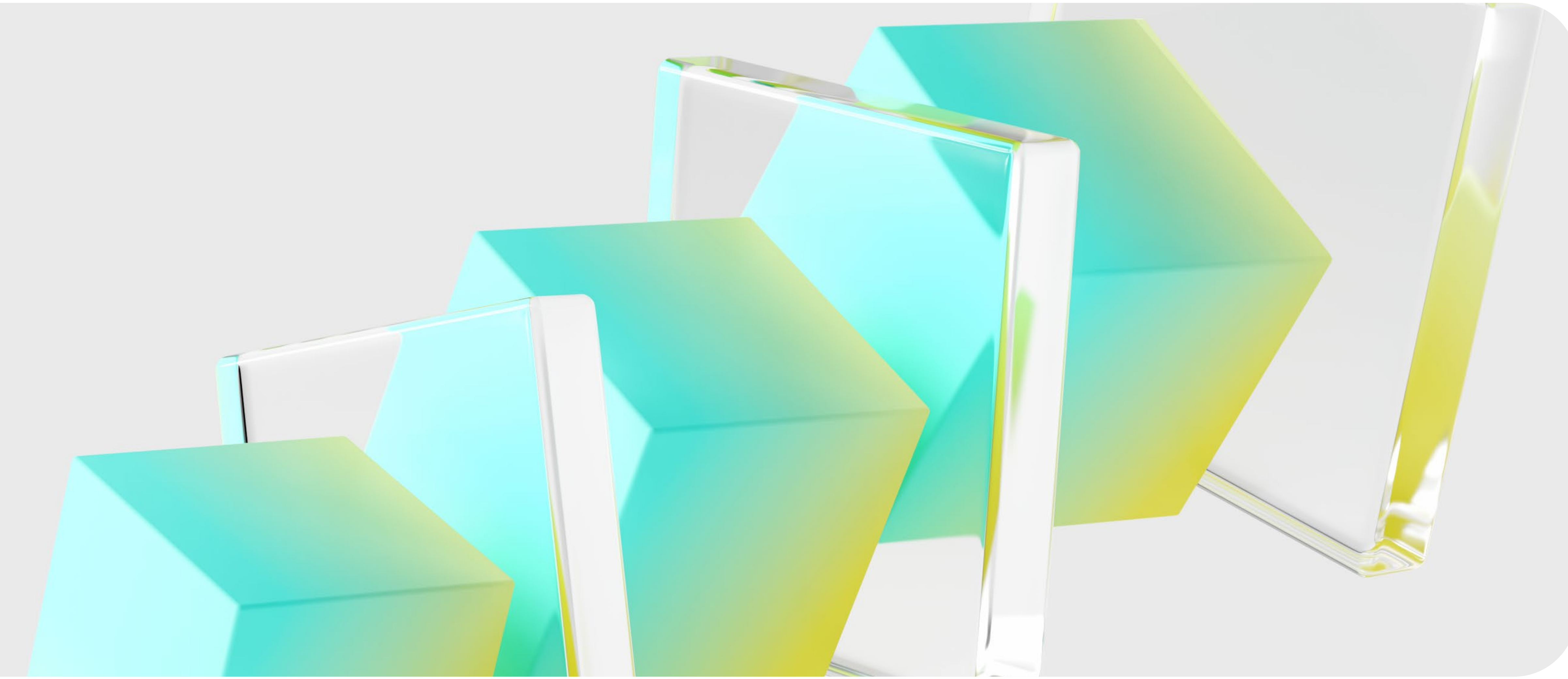
Disclosure Policy

Sustainable growth



"We attest that, to the best of our knowledge, the Pillar 3 disclosures have been prepared in accordance with ClearBank's Pillar 3 disclosure standards and internal controls framework."

Mark Fairless
Chief Financial Officer

Basis of preparation

These Pillar 3 disclosures are prepared according to the requirements of the Disclosures ('CRR') part of the PRA Rulebook as applicable to non-listed firms meeting the definition of small and non-complex institutions, as set out in the PRA Rulebook Disclosures (CRR) section, Article 433b.

Scope of consolidation

Any de minimus wholly owned subsidiaries have been excluded from these disclosures and as ClearBank Limited is the only regulated entity in the Group, these Pillar 3 disclosures are prepared for this entity only.

Verification and quality assurance

Pillar 3 disclosures are not subject to external audit. However, as per the ClearBank policy, these Pillar 3 disclosures have been reviewed in line with the internal governance procedures applicable to all ClearBank external reporting, including review and approval by the Board Audit Committee and Board.

The Directors have considered the adequacy of this Pillar 3 disclosure and are satisfied that the disclosures are both accurate and comprehensive.

Frequency, media and location

ClearBank's policy is to publish Pillar 3 disclosures on an annual basis in conjunction with the ClearBank Annual Report and Accounts. Pillar 3 disclosures are published on the corporate website: www.clear.bank. The frequency of disclosure will be reviewed if there should be any material changes in regulatory requirements, corporate structure, or capital calculation methodology.

Key metrics

Robust capital, liquidity and balance sheet

Our regulatory metrics remain strong.

In line with our risk appetite, we maintained a robust capital position throughout the year, with a CET1 of 88% (2021: 140%) at the year end, maintaining headroom in excess of our total capital requirements.

Our Liquidity Coverage Ratio of 297% (2021: 186%) and our Net Stable Funding Ratio of 5,429% (2021: 11,701%) demonstrates a strong liquidity position for the Bank.

The vast majority of our High Quality Liquid Assets of £3,081m (2021: £2,719m) are held as cash in sterling at the Bank of England. Excluding a one-off impact on customer deposits caused by new macroeconomic developments, the like-for-like increase in the Bank of England balance was 33%.

	31 Dec 2022	31 Dec 2021
Available own funds (£m)		
Common Equity Tier 1 ('CET1') capital (£m)	**33**	37
Tier 1 capital (£m)	**33**	37
Total capital (£m)	**33**	37
Risk-weighted assets ('RWA') (£m)		
Total risk-weighted exposure amount (£m)	**38**	26
Capital ratios (% of RWA)		
Common Equity Tier 1 ratio (%)	**87.66%**	139.70%
Tier 1 ratio (%)	**87.66%**	139.70%
Total capital ratio (%)	**87.66%**	139.70%
Additional own funds requirements based on SREP (% of RWA)		
Additional CET1 SREP requirements (%)	**0.00%**	0.00%
Total SREP own funds requirements (%)	**0.00%**	0.00%
Combined buffer requirement (% of RWA)		
Capital conservation buffer (%)	**0.00%**	0.00%
Institution specific countercyclical capital buffer (%)	**1.00%**	0.00%
Combined buffer requirement (%)	**1.00%**	0.00%
Overall capital requirements (%)	**17.49%**	21.77%
CET1 available after meeting the total SREP own funds requirements (%)	**79.45%**	83.83%

	31 Dec 2022	31 Dec 2021
Leverage ratio		
Total exposure measure excluding claims on central banks	**241**	94
Leverage ratio excluding claims on central banks (%)	**13.87%**	38.79%
Liquidity Coverage Ratio		
Total high-quality liquid assets ('HQLA') (Weighted value -average) (£m)	**3,081**	2,719
Cash outflows – Total weighted value (£m)	**1,053**	1,462
Cash inflows – Total weighted value (£m)	**16**	0
Total net cash outflows (adjusted value) (£m)	**1,037**	1,462
Liquidity coverage ratio (%)	**297.05%**	185.94%
Net Stable Funding Ratio		
Total available stable funding (£m)	**2,062**	1,190
Total required stable funding (£m)	**38**	10
NSFR ratio (%)	**5429.15%**	11701.32%

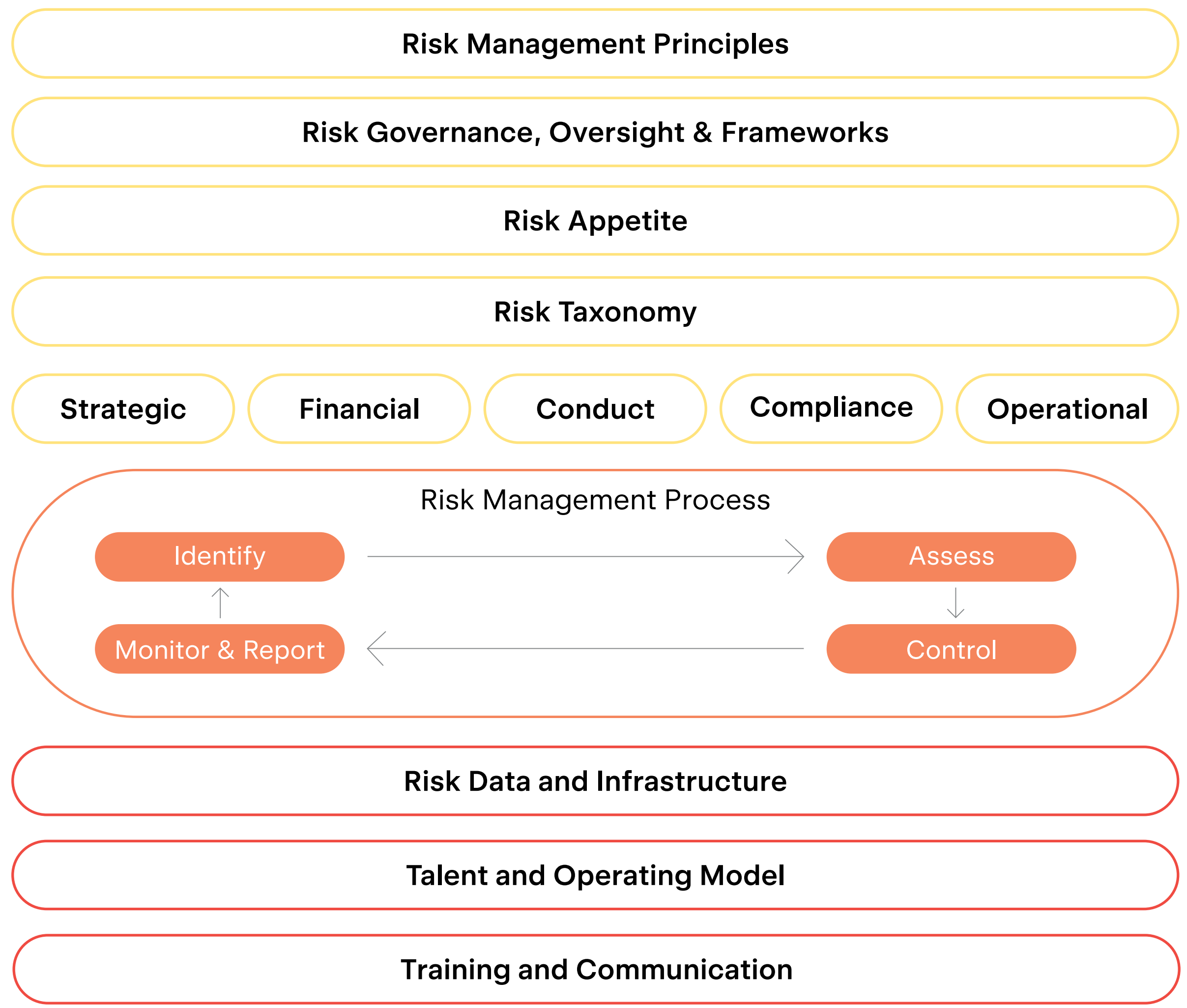
Dynamic risk strategy

Enterprise Risk Management Framework ('ERMF')

We continue to manage our risks using an ERMF that's been designed to provide a clear and consistent approach to the management of all risks and controls within the boundaries of the agreed Board risk appetite. The ERMF is embedded in the day-to-day management of the business, with supporting standards and procedures that are applied to support the safe achievement of our strategic objectives.

The structure of the ERMF comprises the key components shown below under our risk management principles which are aligned to ISO 31000. The ERMF is underpinned by our risk culture and 3 Lines Model. This is aligned to industry best practice.

The structure of the ERMF comprises of eight key components:



The 3 Lines Model

Supporting our risk management and the ERMF we operate a 3 Lines Model which emphasises collaboration between the first and second lines, drives greater accountability and ownership for delivering good outcomes, and supports efficiency and scalability, as we grow, and drives dynamic and proactive risk management and faster resolution of issues.

Risk reporting and governance

We produce regular risk reporting for our risk committees aligned to our risk taxonomy and cover the five key risks to which ClearBank is exposed. Please refer to the Annual Report and Accounts pages 44-49 for more information on our Board and committee structure and associated activities. Each committee has responsibility for the monitoring and oversight of our risk profile in line with our risk appetite, which is reviewed and approved annually by the Board.

Risk management continued

Risk culture

Our risk culture is a principal supporting factor of our risk management framework. It has been established and is maintained through a set of values, risk principles and the correct 'tone from the top' from our executive leadership and the Board, who provide clear and consistent messaging of our commitment to the management of risk through all levels of the Bank.

The Bank's purpose and values. Striving for good outcomes for our customers, staff and partners consistent with our purpose.

'Tone from the top' – communicating our commitment to the management of risk. Competent, capable and accountable leadership.

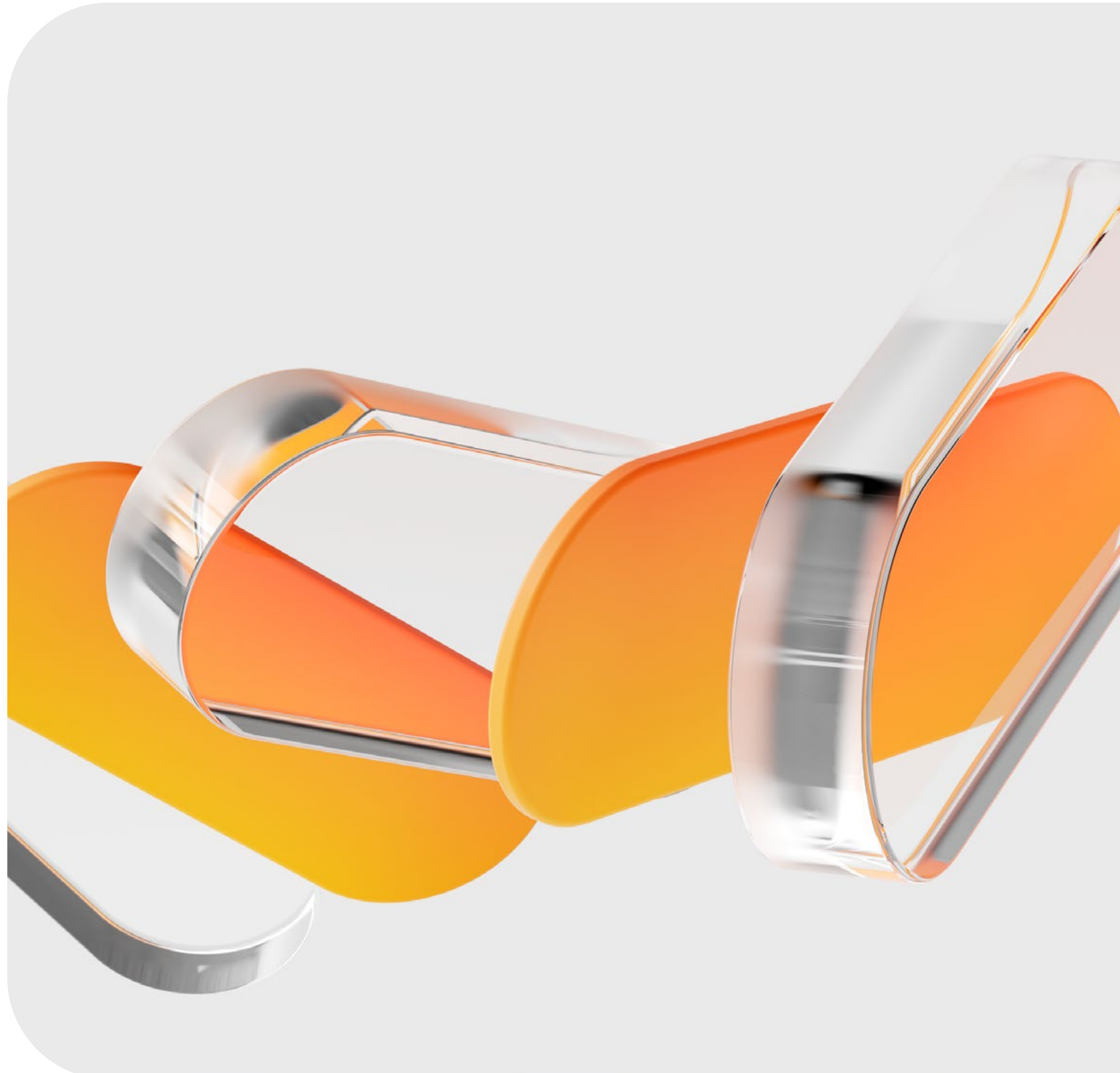
Approach to reward and managing people aligns to our culture, including recruitment, objective setting and performance management.

Code of Conduct and other key policies in place to support our staff to understand the boundaries in which they are expected to operate.

Regular risk training and the development of staff to ensure risk awareness is embedded and maintained in their daily roles.

Senior Management and Certification Regime ('SM&CR') compliance supports risk-informed decision making.

Strong governance arrangements in place, having a clear framework of responsibility that oversees how we operate on a day-to-day basis.



Risk management continued

Key risks	2022 change in risk profile	2023 risk outlook	How key risks are mitigated	Commentary
Compliance Risk Includes financial crime compliance and regulatory compliance risks	Improving ↗	Improving ↗	Mitigated in a number of ways including horizon scanning for changes in regulatory and financial crime requirements, tracking regulatory change actions to closure ensuring we are and do remain compliant and customers continue to be protected, and regular oversight and control testing activities to demonstrate compliance and identify any processes or controls that may require strengthening.	A focus on enhancing AML, counter-terrorist financing and sanctions systems, controls, policies, procedures, and subject matter expertise has seen a consistently improving financial crime risk position during 2022, where risk exposure has reduced in recognition of the material control improvements delivered. Going into 2023, this will remain an area of focus to ensure we continue to reduce our risk exposure and remain compliant.
Conduct Risk Includes culture, behaviours, and partner risks, as well as governance and product risks	Stable ↔	Improving ↗	Mitigated through consistent and appropriate 'tone from the top', regular training to support staff in understanding what good conduct looks like, robust product life-cycle governance, and ongoing improvements to our complaints monitoring and oversight, both in our clearing portfolio and embedded banking partnerships.	Conduct risk has remained a key area of focus throughout 2022 as providing excellent customer service and good customer outcomes is core to our values. As we continue to grow during 2023, we will continue to work closely and collaboratively with our partners, to ensure this is achieved for all customers in line with the new Consumer Duty.
Financial Risk Includes capital, liquidity, and funding risks, and also includes credit, interest rate and market risks	Stable ↔	Stable ↔	Mitigated by ensuring that we understand our sources of risk and place limits on specific types of risk taking to remain within tolerance levels and supported by our capital and liquidity planning processes which also stress test our assumptions and drive mitigating actions to reduce any risk exposure. We also ensure we maintain sufficient levels of capital and liquidity above regulatory requirements.	Financial risk has remained stable with capital boosted by the interest rate increases driving net interest income, and the Apax capital investment. 2023 will see continued focus on capital and liquidity risks and control effectiveness testing.
Operational Risk Includes information, technology, transaction processing and execution risks, as well as people, fraud, financial reporting, and model risks. Also includes legal, outsourcing, physical security, and business continuity risks	Stable ↔	Improving ↗	Mitigated through a number of operational frameworks, models, and strategies, with regular and comprehensive risk and control self-assessments and control testing activities, which ensure that we fully understand our risk exposure and take further risk mitigation actions where necessary to strengthen the control environment and remain within risk appetite.	Overall operational risk has remained stable, albeit with notable improvements in some areas, such as in transaction processing and execution risk, due to the streamlining and automation of a number of manual processes and controls, and also outsourcing risk given the focus on operational resilience throughout 2022. The continued growth of our number of clearing clients and embedded banking partnerships will increase our inherent operational risk exposure in 2023 and therefore we will continue to focus on ensuring the control environment is strengthened commensurately to ensure operational risks remain within tolerance. There will be particular focus on information, outsourcing and people risks and controls.

Key risks	2022 change in risk profile	2023 risk outlook	How key risks are mitigated	Commentary
Strategic Risk Includes environmental and social, political, and economic risks as well as business and competition risks	Stable ↔	Stable ↔	Mitigated through a regular and comprehensive review of our strategy ensuring that our financial plans and annual objectives are aligned to and supported by the strategy. This includes tracking of our client pipeline and attrition, controlling costs and adherence to budget, monitoring diversity and inclusion data – for example gender diversity at a senior leadership level, and keeping close to external factors, macroeconomic and geopolitical events that could impact our customers and our strategy, such as growing inflation and Russia's invasion of Ukraine.	Whilst transaction volumes and customer onboarding numbers have been impacted by the geopolitical and wider economic climate during 2022, this is balanced with good profitability against budget and a very strong pipeline going into 2023. We will continue to focus on optimising revenues from both existing and new customers and the effective management of our international expansion risks. Gender and diversity in the workforce and ESG will also remain key areas of focus.

Outlook and emerging risks

Both our external and internal risk landscape has continued to change throughout 2022 with major geopolitical events such as the war in Ukraine, uncertainty in the UK economy and significant regulatory compliance changes. Our own strategic plans for growth and international expansion impact our risk exposure and create the potential for new risks to emerge as we head into 2023.

We continue to proactively horizon-scan to identify new and emerging risks, and regularly assess the potential impacts these may have on our clients, partners and on our business strategy and objectives. This enables us to effectively prioritise and focus on the control environments of our highest risk areas, ensuring no material detriment occurs and we remain within our Board level agreed risk appetites.

Russia's invasion of Ukraine will continue to create uncertainty for the foreseeable period, due to periodic sanctions changes, prohibitions, and increased information security threat levels. We will therefore continue to focus on our cyber and data security, financial crime and operational resilience controls and testing to support the prevention of disruption, harm, and regulatory breaches, and to ensure business continuity.

We'll continue to effectively manage the risks associated with our international expansion and plans for growth, closely monitoring and assessing the risks, developing and completing risk mitigation action plans to ensure we have adequate controls in place to effectively manage the risks. We'll continue to refine our assessment of the risks posed to the UK business as a result of international expansion by the wider group, and will continue providing Senior Management and Board level insight and assurance on a regular basis throughout 2023.

Growth of clearing client and embedded banking partner numbers will naturally increase our operational, conduct and compliance risks exposure, and the need for ClearBank to be scalable and secure. This heightens the importance of continuing to strengthen our control environment and the effectiveness of our risk management approach.

Risk management continued

Funding and liquidity risk

Liquidity exposure represents the potential stressed outflows in any future period less expected inflows and considers liquidity from both an internal and a regulatory perspective. ClearBank maintains adequate levels of liquidity and will ensure that it continues to maintain sufficient levels of liquidity to meet foreseeable and unexpected needs. Limits for the level, type and maturity of liquidity and deposit funding balances are set by BRC and independently monitored by the Finance, Treasury and Risk departments on a daily basis for compliance within these limits.

Daily monitoring and control processes are in place to address internal and regulatory liquidity requirements. ClearBank monitors a range of market and internal early warning indicators on a daily basis for early signs of liquidity risk in the market or specific to ClearBank. This captures regulatory metrics as well as metrics ClearBank considers relevant for its liquidity profile. These are a mixture of quantitative and qualitative measures, including: daily variation of client balances; cash outflows; funding concentration; and changing funding costs.

Internal stress testing is carried out on its liquidity and potential cash flow mismatch position over both short and long term horizons against a range of scenarios forming an important part of the internal risk appetite. The scenarios and assumptions are reviewed at least annually to ensure that they continue to be relevant to the nature of the business including reflecting emerging horizon risks to ClearBank, such as the impact of Russia's invasion of Ukraine.

Credit risk

Credit risk is the risk of financial loss arising from a client or counterparty failing to meet their financial obligations in accordance with agreed terms. ClearBank does not lend, advance funds or offer overdraft facilities to partners and therefore has no direct credit exposure to its customers.

Our policy of holding our clients' sterling funds securely overnight at the Bank of England remains a core part of our client proposition, providing them with complete peace of mind that their deposits are safely protected from commercial credit risk.

Market and interest rate risk

Market risk is the risk that changes in market prices, such as interest rates, will affect income or the value of the Group's assets and liabilities. The objective of our market risk management strategy is to manage and control market risk exposures within acceptable parameters to ensure solvency while optimising the return on risk.

Interest rate risk is the risk of financial loss through un-hedged or mismatched asset and liability positions that are sensitive to interest rate changes. ClearBank's banking deposits are subject to variable interest rates; as a result, changes in interest rates could have an impact on the net interest income recognised in the year.

Conduct risk

ClearBank recognises the importance that culture plays in delivering fair outcomes and ensuring values are demonstrated in practice. ClearBank's leadership values and tone from the top promote positive and fair outcomes for all clients. This includes the fair treatment of clients being at the heart of the business strategy and having the ability to evidence good outcomes for clients.

The management of conduct risk forms a core pillar of the RMF; this framework, along with the independent oversight and assurance provided by the second and third lines, ensures that the strategy, principles, policies, and resources are aligned to the risk appetite, regulatory requirements, and industry best practices.

Operational risk

Operational Risk can result in financial or non-financial losses such as client detriment or reputational damage resulting from inadequate or failed internal processes, people, and systems. Given the nature of ClearBank's focus on transactional banking services, maintaining secure and reliable systems connectivity to the various payment schemes is essential.

ClearBank continues to develop and invest in systems and controls to mitigate all operational risks, supported by the oversight of experienced staff.

Regulatory and compliance risk

Regulatory and compliance risk covers the possibility that regulatory and legislative changes may significantly impact the business model or that ClearBank fails to comply with existing requirements.

ClearBank operates within the context of the UK Legal and Regulatory environment, but also within European law adopted and supported by UK regulators. In addition, it also complies with United Nations sanctions obligations and other internationally focused regulations where applicable. This context does not in itself create any material or specific risks, however, non-adherence or breach of such laws and regulations could have significant negative impact.

Legal Counsel and Compliance functions monitor changes to the legal or regulatory landscape and are responsible for reporting forthcoming changes to management committees and to the Board, and for determining what appropriate subsequent actions need to be taken by senior management in response.

Operational resilience

The business continues to embed the PRA's operational resilience, outsourcing and third party risk management requirements, which relates to our ability to prevent, respond to, recover, and learn from operational disruptions. Our clients demand uninterrupted services, and our technology provides high levels of availability, reliability and resilience delivering optimal operational outcomes.

We protect against operational risk events by mirroring our cloud native technology platform in separate zones within Microsoft Azure. This negates any service disruption to our clients. Further information on our operational resilience and how such risks are managed can be found in the Annual Report and Accounts from page 57.

Environmental, Social and Governance ('ESG')

Having laid some key foundations, this year we will strengthen our ESG proposition to ensure it remains at the very heart of our business and serves as a guiding priority for everything we do.

A new ESG taskforce led by executive colleagues has been mandated with delivering our ESG ambition and building robust measures of success so that our people, clients, Board, investors, and the wider community can track our progress.

Information on our ClearBank is giving due consideration to our ESG obligations can be found in the Annual Report and Accounts from page 26.

Risk management continued

Internal Capital Adequacy Assessment Process ('ICAAP')

ClearBank undertakes an ICAAP which is an internal assessment of Pillar 2A and Pillar 2B capital requirements.

The Pillar 2A assessment considers firm specific risks and risks not included in Pillar 1. The Pillar 2B element provides an assessment of ClearBank's stressed capital adequacy in the context of its business strategy, risk appetite, risk profile and capital plan throughout a five-year planning horizon. The capital plan forms the starting point for stress testing which considers the impact of alternative scenarios to ClearBank's plan and deploys management actions where necessary to ensure we would remain within our risk appetite under the hypothetical scenarios. The ICAAP is undertaken annually or more frequently should the need arise.

The ICAAP is presented to ALCO and BRC, for challenge and approval. The Board ratifies the ICAAP following its approval by BRC. The PRA assesses ClearBank's ICAAP and sets the Total Capital Requirement ('TCR').

Overview of RWA

	Risk weighted exposure amounts (RWEAs)		Total own funds requirements
	31 Dec 2022	31 Dec 2021	**31 Dec 2022**
Credit risk (excluding CCR) (£m)	**16**	17	**1**
Of which the standardised approach (£m)	**16**	17	**17**
Operational risk (£m)	**22**	9	**2**
Of which basic indicator approach (£m)	**22**	9	**2**
Total (£m)	**38**	26	**3**

Credit risk

Overview

Credit risk is defined as the risk of financial loss arising from a borrower or counterparty failing to meet their financial obligations to the Bank in accordance with agreed terms.

Credit risk measurement

ClearBank uses the Standardised Approach ('SA') to calculate credit risk. Under the SA, the Bank applies a risk weighted asset value to each of its exposure classes and provides 8% of that risk weighted value as the minimum capital requirement for credit risk under Pillar 1.

Operational risk

Overview

Operational risk is defined as the risk of financial loss or reputational damage resulting from inadequate or failed internal processes, people and systems or from external events. It includes legal, regulatory, technology, information security and fraud risks, and is inherent in all activities and processes.

Operational risk measurement

ClearBank uses the Basic Indicator Approach for calculating its Pillar 1 operational risk capital requirements. Under this approach, the Bank applies a risk weight to the average of the past 3 years' audited revenue, and is required to hold 8% of that risk weighted value as the minimum capital requirement for operational risk under Pillar 1.

Liquidity and funding risk

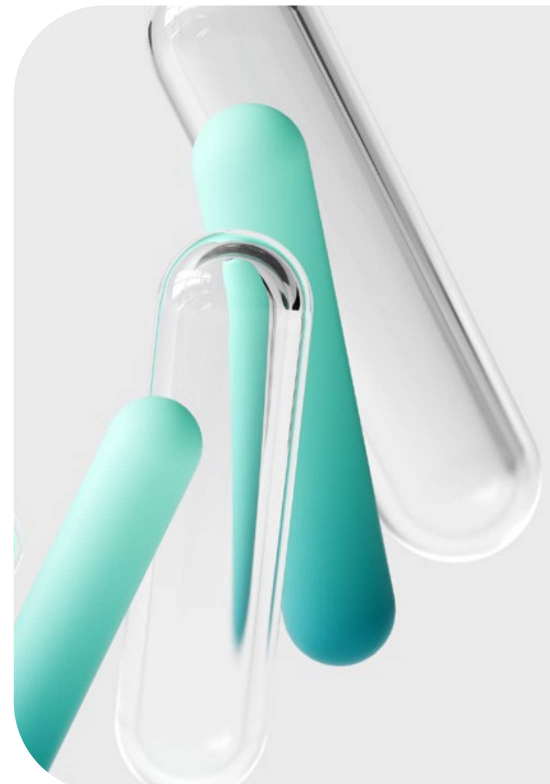
ClearBank's management of liquidity and funding risks always aims to ensure that there are sufficient liquid assets, both as to amount and quality, to cover cash flow mismatches and fluctuations in funding, to meet financial obligations as they fall due, even during periods of stress.

This is achieved through management and stress testing of business cash flows, setting appropriate risk limits to maintain a prudent funding mix and maturity profile, and maintaining sufficient levels of high-quality liquid assets and appropriate encumbrance levels.

As at 31 December 2022, ClearBank's Liquidity Coverage Ratio ('LCR') was 297% (and averaged 255% during Q4) which was well above the UK regulatory minimum of 100%. ClearBank continues to manage its liquidity against its internal risk appetite; such appetite being more prudent than the regulatory requirements.

ClearBank currently exceeds the PRA's expected 100% minimum future requirement for the Net Stable Funding Ratio ('NSFR'), with a ratio of 5,429% at 31 December 2022.

ClearBank manages liquidity and funding risks within a comprehensive risk framework which includes its policy, strategy, limit setting and monitoring, stress testing and robust governance controls. The size and mix of the liquid asset buffer are defined by the Bank's risk appetite as set by the Board, which is translated into a set of liquidity risk limits. ClearBank's liquid assets, which predominately comprise balances held at the Bank of England, are managed by its Treasury function.



Remuneration

The Remuneration Committee ensures that remuneration arrangements support the strategic aims of the business and enable the recruitment, motivation and retention of all staff within the required regulatory framework.

Remuneration Policy and practices

This section provides details on the remuneration of the Board and employees of ClearBank including the approach for material risk takers for the year ending 31 December 2022. Material risk takers are those individuals whose actions may have a material impact on the risk profile of ClearBank. The policy and level of remuneration is determined by ClearBank's Remuneration Committee.

All employees who are subject to the Senior Managers Regime, either as a Senior Manager or as a Certified Individual, will be duly advised of their status on an annual basis. These employees are required to remain up to date with regulatory training and are subject to a more detailed performance management and development planning process. For these employees, ClearBank's Responsibility Map and the Individual Statements of Responsibility are used as the core underlying metrics and accountabilities. ClearBank will keep records of the results of these annual assessments, which will feed into a determination of each individual employee remuneration package and any decisions to review or adjust remuneration awards.

Remuneration Policy

ClearBank's Remuneration Policy (the 'Policy') and approach to remuneration are designed to support the delivery of ClearBank's corporate strategy and align remuneration with the long term interests of our shareholders, in a manner that is compliant with the requirements and frameworks of the FCA and PRA's rules on remuneration.

Remuneration Committee

Remuneration for ClearBank is overseen by the Remuneration Committee. The membership of the Committee is made up of three independent Non-Executive Directors who retain ultimate discretion for those matters as outlined within its Terms of Reference.

The Committee agrees the framework and policy for remuneration, terms of employment and any changes to service contracts.

A standing invitation exists to either of the two Investor Directors to join the Committee or to attend at any time. In addition, the Non-Executive Chair and the Chief Executive Officer may be invited to attend meetings on an ad-hoc basis, although neither have the mandate to determine policy for any matter brought before the Committee for approval.

Non-Executive Directors' remuneration

Remuneration paid to Non-Executive Directors is based on data from financial institutions of comparable size and complexity. Non-Executive Directors are paid an annual fee which covers all their duties and responsibilities to ClearBank.

Executive Directors' remuneration

Executive Directors' remuneration is determined by taking into account the specific role performed and is made up of individual remuneration components which when combined ensure an appropriate and reasonable remuneration package. It includes:

- Base salary, including fixed allowances if any ('Fixed Pay')
- Performance-based remuneration ('Variable Pay') including share options
- Pension and insurance schemes
- Other benefits

Fixed pay

Fixed pay is determined on the basis of the role and the position of the individual employee, including professional experience, responsibility, job complexity and local market conditions. Decisions on adjustments to employees' fixed pay are currently reviewed on an as-needed basis.

Variable pay

All variable pay is entirely discretionary. Any bonus payment or share option awarded are assessed at the time of delivery taking into account all relevant factors, including financial results, the achievement of personal milestones, adherence to standards of expected behaviour and any risk events and mitigation. Prior to any variable payments being made, the Remuneration Committee and Board confirms that such payment will not undermine the Bank's capital position in relation to its regulatory requirements or risk appetite. Any variable payments for members of the Executive Committee and any senior officers in the risk and control functions will also be subject to approval by the Committee.

Pension and insurance schemes

Pension and insurance schemes guarantee employees cover in the event of critical illness, short term loss of income, death, and pension payment on retirement. Employees are covered by a suite of comprehensive and externally benchmarked insurance and pension schemes.

Other benefits

Other benefits include a Company medical insurance programme and other benefits as awarded on the basis of individual employment contracts and local market practice.

Self-assessment of compliance with disclosure (CRR) part of the PRA rulebook

CRR Reference	High-level summary	Disclosure reference
435(1)(a)	The strategies and processes to manage risks	Page 6 onwards
435(1)(e)	A declaration of adequacy of risk management arrangements approved by the Board	Page 3
435(1)(f)	Concise risk statement approved by the Board	Annual Report and Accounts Page 30
438(d)	Total risk-weighted exposure amount and the corresponding total own funds requirement to be broken down by the different risk categories	Page 14
447	Disclosure of key metrics	Page 4
450(1)(a)	Information concerning the decision-making process used for determining the remuneration policy	Page 16
450(b)	Information about the link between pay of the staff and their performance	Page 16

Glossary

ALCO	Asset and Liability Committee
Bacs	Bacs payments services limited
BRC	Board Risk Committee
CEO	Chief Executive Officer
CHAPS	Clearing House Automated Payment System
ClearBank	ClearBank Limited unless otherwise stated means the Company in line with regulatory reporting requirements
CRCO	Chief Risk and Compliance Officer
EBA	European Banking Authority
FCA	Financial Conduct Authority
FI	Financial Institutions
FSCS	Financial Services Compensation Scheme
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Individual Liquidity Adequacy Assessment Process
LCR	Liquidity Coverage Ratio
PRA	Prudential Regulation Authority
RMF	Risk Management Framework
SREP	Supervisory Review and Evaluation Process
TCR	Total Capital Requirement

Key information

Registered office address

ClearBank
Borough Yards
13 Dirty Lane
London
SE1 6PA

Legal Entity Identifier

213800PERENGATFCHD95

Company registered number

09736376