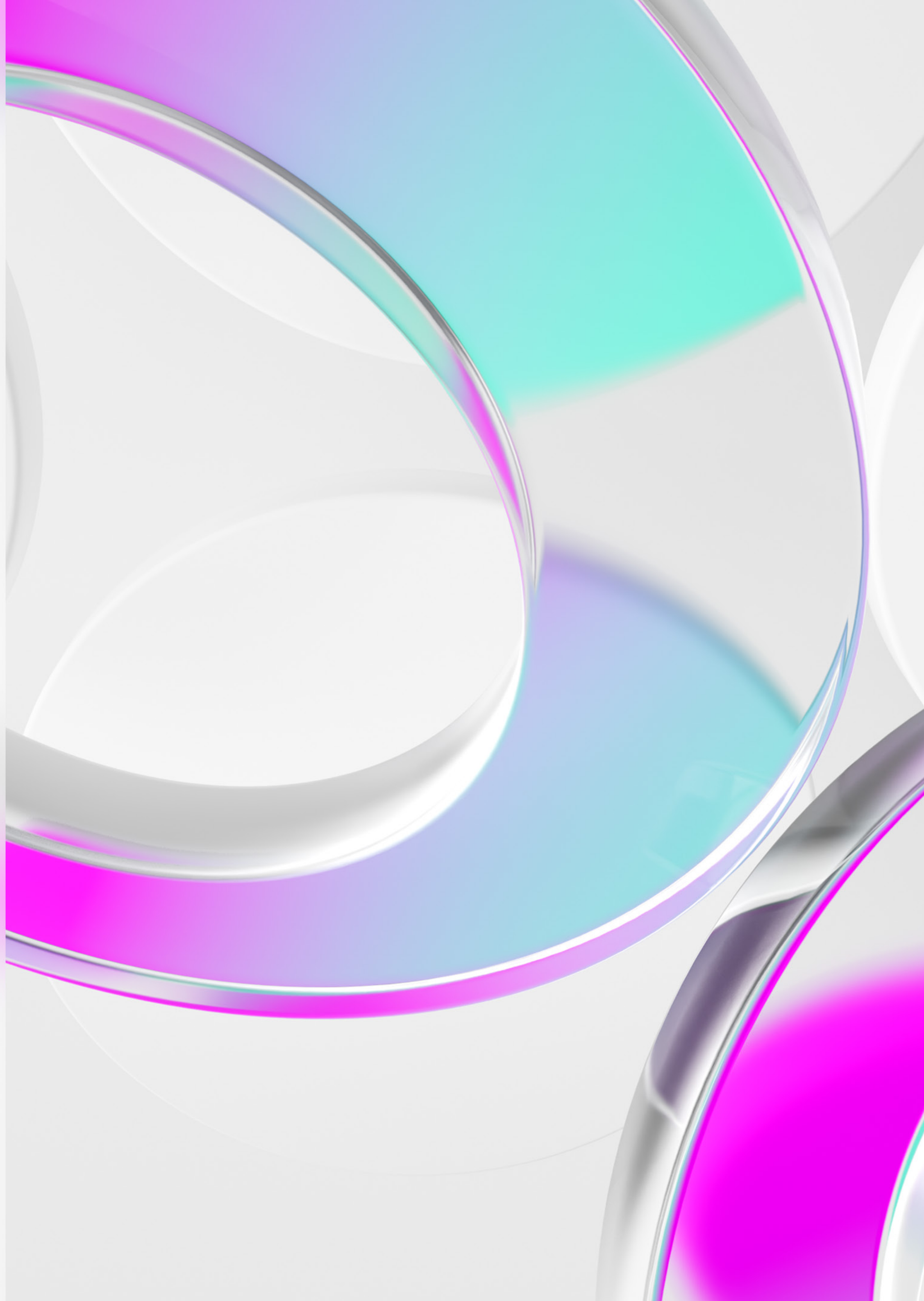
ClearBank Europe N.V. Pillar 3 Disclosure 2025



Clear.Bank®

The bank built for game changers®

Contents

This report was approved by the Management Board on 19th May 2026.

Tristan Kirchner
Chief Executive Officer

Innovate. Differentiate. Grow.

ClearBank's Purpose

To unlock our clients' potential

ClearBank's Ambition

To be the leading global provider of embedded banking and clearing solutions

ClearBank Europe at a glance

Driven by technology, powered by people

Who we are

ClearBank Europe N.V. (‘ClearBank Europe’ or ‘the bank’, hereafter) is a purpose-built, technology-enabled clearing bank offering market-differentiating banking products to financial institutions through a single Application Programming Interface (API). With its credit institution licence received on 25 July 2024 and under the supervision of both the Dutch Central Bank (De Nederlandsche Bank, DNB) and the European Central Bank (ECB), ClearBank Europe leverages innovative payments technology to enable financial institutions to offer secure accounts, clear payments in real-time, and enhance their banking propositions for their customers.

ClearBank Europe is part of ClearBank Group Holdings Limited (‘ClearBank’). ClearBank has two operating entities, being ClearBank Limited (‘ClearBank UK’) and ClearBank Europe. ClearBank Europe leverages the ClearBank Group’s banking platform and payments technology while operating under a distinct European regulatory and governance framework.

What we do

ClearBank Europe currently operates a single business line of payments clearing providing sponsored access for regulated financial institutions to regulated payment systems. ClearBank Europe currently does not invest customer deposits but holds customer deposits at the Dutch and European Central Banks. This low-risk model provides maximum safety and liquidity for customer deposits.

To mitigate risk, ClearBank Europe’s clearing and settlement activities are pre-funded by its clients. ClearBank Europe currently does not provide fixed-term lending or engage in investment activities, resulting in the holding of extremely low risk weighted assets (RWAs) in the form of central bank reserves. This banking model provides a lower risk alternative to traditional ‘fractional reserve’ banking models.

ClearBank Europe launched its agency banking proposition in 2024 after obtaining its credit institution licence. It has passported its licence into various countries in Europe. During the period, ClearBank Europe established and registered a branch in France with De Nederlandsche Bank (DNB), enabling the provision of regulated activities within France under the existing licence framework.

Disclosures

Basis of preparation

These Pillar 3 disclosures are prepared according to Part eight of the Capital Requirements Regulation (CRR) as applicable to non-listed firms meeting the definition of small and non-complex institutions, as set out in Article 433b.

We have not omitted any disclosures on the basis of being regarded as proprietary or confidential. If a disclosure has been omitted on the basis of being immaterial, this will be noted in the relevant section of the report.

Scope of consolidation

The Pillar 3 disclosures have been prepared for ClearBank Europe N.V. as at 31 December 2025 and cover the period of 1 January 2025 till 31 December 2025.

Verification and quality assurance

Pillar 3 disclosures are not subject to external audit and have been produced solely for the purpose of satisfying Pillar 3 regulatory requirements. However, these Pillar 3 disclosures have been reviewed in line with the internal governance procedures applicable to all ClearBank external reporting. The ClearBank Europe Management Board have discussed the Pillar 3 Report and the internal governance to prepare this.

The ClearBank Europe Management Board acknowledges that the Pillar 3 Report adequately conveys the risk profile of ClearBank Europe and the risk management systems are adequate with regards to the profile and strategy of ClearBank Europe.

Frequency, media and location

The Pillar 3 disclosures are published on an annual basis 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.

A self-assessment of the disclosure requirements can be found in the Appendix, which references the relevant sections of this document.

Risk management

Enterprise Risk Management Framework (ERMF)

Our approach to risk management

The Enterprise Risk Management Framework (ERMF) covers the risk management processes of identification, assessment, control, mitigation and reporting of risks to which ClearBank Europe is exposed. The ERMF has been designed to provide a clear and consistent approach to the management of all risks and controls within the boundaries of the agreed risk appetite of ClearBank Europe. The risk appetite statement of ClearBank Europe is aligned to and within the risk appetite of ClearBank Group. The ERMF is underpinned by our risk culture and 3 Lines Model.

ClearBank Europe's risk management approach is focused on the following principles:

- Ownership
- Forward looking
- Close monitoring

The 3 Lines Model

Supporting the risk management framework, we operate a 3 Lines Model, fostering collaboration. This approach enhances accountability and ownership for delivering good outcomes and supports efficiency and scalability as we continue to grow.

Risk culture

A strong risk culture is the foundation of our ERMF. Our culture is cultivated and maintained through core values, risk principles, training and by the right tone from the top from the Management Board and Supervisory Board. This commitment ensures a clear and consistent emphasis on managing risk effectively.

Risk reporting and governance

ClearBank Europe produces regular risk reporting for ClearBank Europe Risk committees covering key risks to which ClearBank Europe is exposed. ClearBank Europe governs itself in accordance with ClearBank Group and local policies as applicable. The policies provide operational application details and are driven by regulatory requirements and other local considerations. 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 Management Board and Supervisory Board of ClearBank Europe.

Principal Risks

To effectively manage risks, ClearBank Europe needs to recognise and understand risks that arise from new and existing activities as well as from external sources. Risk identification is an ongoing process and is considered through all levels of the organisation. It is important to understand the causes and impacts of risks to manage the risks effectively. Risk identification includes emerging risks, new risks being introduced as part of changes (such as new products or services) and existing risks. The identification and categorisation of risks is reflected within the relevant risk registers and aligned with the Risk Taxonomy.

Risk management cont.

Key Risks	Risk profile	Outlook
Strategic Risk **The risk that the ClearBank business model does not deliver the expected financial and non-financial benefits to its customers, shareholders and wider stakeholders. This may be as a result of poor decision making, substandard execution of decisions, inadequate resource allocation or from a failure to effectively respond to changes in the business/market environment or changing customer behaviour and technological expectations.**	ClearBank Europe's strategic risk profile is influenced by evolving regulatory expectations, macroeconomic uncertainty, and rapid technological change within the European banking sector. The organisation monitors key strategic indicators such as client pipeline, cost efficiency, and customer concentration, alongside ESG measures including board-level gender diversity and reputational insights.	ClearBank Europe's strong client and product pipelines support a positive outlook for both business performance and strategic risk management.
Financial Risk **The risk that ClearBank does not have the financial resilience to support its strategy and growth objectives. This includes ensuring sufficient levels of capital and liquidity are held, as well as managing exposure to risks including interest rate risk, market risk and credit risk.**	ClearBank Europe continues to operate under the financial risk framework aligned with the parent group's standards and EU regulatory requirements. The Company's financial risk exposure is driven by the simple structure and compositions of its balance sheet, and customer deposits being held with the Dutch and European Central Banks.	ClearBank Europe will continue its growth trajectory and will further manage its financial risk in a conservative manner. Additional capital injections are required to support the growth plan with initial loss making years. The parent group has committed to provide the required capital. ClearBank Europe will develop a lending proposition to support clients in managing their funding requirements.
Operational Risk **The risk refers to the potential for loss or disruption from failures in internal processes, systems, or human actions. It encompasses legal failures, payment scheme non-compliance, resilience failures, process inefficiencies, and external events. To mitigate these risks, we maintain robust controls, foster a culture of risk-awareness, and operational resilience to safeguard integrity and stakeholder confidence.**	ClearBank Europe continues to strengthen its operational risk framework to ensure resilience and regulatory compliance.	ClearBank Europe will strengthen its operational resilience to support sustainable growth. The focus remains on enhancing resilience and governance, ensuring scalability.

Risk management cont.

Key Risks	Risk profile	Outlook
Third Party & Outsourcing Risk **The risk of impact or loss resulting from failures in assessing, managing, or overseeing third-party and outsourcing relationships—including suppliers, intra-group entities, and embedded banking partners. This includes risks arising during onboarding, ongoing oversight, and exit of arrangements. Effective systems and controls are essential to ensure third party and outsourced parties meet required standards, with risk-based measures such as service level agreements applied to safeguard operational resilience, financial integrity, and reputation.**	ClearBank Europe's operating model relies significantly on outsourced services, which includes intragroup outsourcing, as well as outsourcing to parties outside the ClearBank group of entities. This outsourcing model makes third-party and outsourcing risk a key area of focus. The Company applies stringent governance and oversight to mitigate risks such as ineffective selection and onboarding, performance shortfalls, concentration risk, and exit management challenges. All arrangements are assessed against regulatory frameworks, including EBA Outsourcing Guidelines and the Digital Operational Resilience Act (DORA).	ClearBank Europe will continue to strengthen its third-party risk management capabilities to meet evolving regulatory expectations and support operational resilience. The Company will also focus on scalability and supplier diversification to prevent concentration risk and ensure continuity as the business grows.
Cyber, Data and Technology Risk **The risk of impact or loss arising from failures in identifying, managing, or overseeing threats to the confidentiality, integrity, and availability of systems and data, and insufficient strategic oversight of technology and data assets. This includes risks stemming from internal vulnerabilities, external threats, third party dependencies, rapid technological change, and failures in systems, infrastructure, or emerging technologies. It also incorporates noncyber risks including inadequate capacity management, poor system scalability, obsolescence and technology governance failures that may impact service delivery.**	ClearBank Europe maintains a strong focus on operational resilience as part of its commitment to reliability and trust. While technology risk remains under close watch due to the reliance on key external providers, the company has reinforced resilience through robust business continuity planning, structured incident management, and proactive testing.	ClearBank Europe is embedding a culture of resilience, embedding further automation, and strengthening its control frameworks to ensure stability, scalability, and compliance in an environment of increasing regulatory expectations and rapid technological change.
Financial Crime Risk **Risk of facilitating business, or failure to maintain adequate controls, that gives rise to illicit activity or the movement of funds derived from the proceeds of crime.**	ClearBank Europe maintains a zero-tolerance approach to financial crime, including money laundering, terrorist financing, fraud, and sanctions breaches. The Company's framework is aligned with EU regulatory requirements and the ClearBank Group's risk appetite. The Company continues to invest in advanced monitoring tools and enhance governance to address emerging typologies and regulatory scrutiny.	ClearBank Europe will continue to enhance its financial crime risk management by deploying strong transaction monitoring technology, enhancing data analytics capabilities, and integrating machine learning to detect evolving typologies.

Risk management cont.

Key Risks	Risk profile	Outlook
Compliance & conduct Risk **The risk that ClearBank fails to comply with relevant regulatory requirements or failing to maintain a constructive relationship with the regulators. This includes the risk that ClearBank fails to deliver good customer outcome and prevent customer harm, which could result in regulatory censure, financial penalty and/or reputational damage.**	ClearBank Europe's compliance agenda reflects heightened EU regulatory expectations and the need for robust governance in a dynamic payments environment. Key priorities include further strengthening product and change risk oversight, continue robust financial crime and sanctions monitoring, and ensuring timely regulatory engagement. Supported by a clear tone from the top and consistent leadership engagement, these efforts foster a culture of integrity and accountability, ensuring transparency, suitability, and alignment with EU standards.	ClearBank Europe will continue to strengthen its compliance and financial crime framework to meet evolving EU regulatory requirements while supporting the Company's growth agenda.
People Risk **The risk refers to the potential for loss or disruption arising from gaps in workforce capacity, capability, or conduct. It encompasses risks linked to how effectively an organisation attracts, retains, engages, and manages its people – especially in roles critical to strategic delivery.**	ClearBank Europe recognizes that its people are central to delivering strategic objectives and maintaining operational resilience. Engagement is monitored through regular feedback cycles, with actions taken to address morale and team dynamics.	ClearBank Europe will prioritise strengthening its talent strategy and fostering team growth to enable sustainable expansion in a dynamic regulatory and operational environment.
Model Risk **Risk of loss or adverse consequences resulting from decisions based on inadequate or poorly understood models or misused models.**	ClearBank Europe's model risk primarily arises from reliance on quantitative models for liquidity, and financial crime monitoring. The risk stems from potential errors in model design, data quality, or assumptions, which could impact decision-making and regulatory compliance. The Company implemented a robust Model Risk Framework.	ClearBank Europe will focus on embedding the Model Risk Framework.

Risk management cont.

Internal Capital Adequacy Assessment Process ('ICAAP')

ClearBank Europe undertakes an ICAAP on at least an annual basis which is an internal assessment of Pillar 2 capital requirements. The Pillar 2 assessment considers firm specific risks and risks not included in Pillar 1. The Pillar 2G element provides an assessment of the bank'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 financial plan forms the starting point for stress testing which considers the impact of alternative scenarios to ClearBank Europe's financial plan and deploys management actions where necessary to ensure we would remain within our risk appetite under the hypothetical scenarios. The ICAAP is presented to the Assets and Liabilities Committee ('ALCO') and the Enterprise Risk Management Committee ('ERMC'), for discussion and review. The Supervisory Board approves the ICAAP following its recommendation by ALCO and ERMC. During the periodic Supervisory Review and Evaluation Process ('SREP'), DNB assesses ClearBank Europe's ICAAP and sets the Overall Capital Requirement ('OCR').

Internal Liquidity Adequacy Assessment Process ('ILAAP')

ClearBank Europe also performs a liquidity assessment on at least an annual basis, where liquidity and funding risks are stress tested as part of the ILAAP which is discussed and reviewed at ALCO and ERMC, and subsequently approved by the Supervisory Board. DNB assesses ClearBank Europe's ILAAP and sets the Pillar 2 Liquidity requirements during the periodic SREP.

Key metrics

Robust metrics above regulatory minimums and internal risk appetite.

During 2025 the following capital injection was made from the parent entity, ClearBank Group Holdings Limited, to ClearBank Europe: €22 million in February 2025.

ClearBank Europe maintains a strong capital position, with a Common Equity Tier 1 (CET1) of 287% and a Leverage Ratio (LR) of 41%, at the year-end 2025, maintaining headroom in excess of capital requirements.

The table in page 11 and 12 reflects the key capital metrics for ClearBank Europe at 31 December 2025.

ClearBank Europe also maintains a strong liquidity and funding position, with a Liquidity Coverage Ratio (LCR) of 249% in Q4 2025 (measured as the average end-of- the-month observations for the quarter), and a Net Stable Funding Ratio (NSFR) of 8,391% at Q4 2025, maintaining headroom in excess of liquidity requirements.

Liquidity Coverage Ratio and Net Stable Funding Ratio are disclosed on a quarterly basis, calculated in accordance with Article 447(f)(g) of the Capital Requirements Regulation (CRR).

The table in page 13 reflects the key liquidity metrics for ClearBank Europe in 2025 at the end of each quarter.

	Available own funds (amounts)	**Amounts in EUR '000**
1	Common Equity Tier 1 (CET1) capital	**33,596**
2	Tier 1 capital	**33,596**
3	Total capital	**33,596**
	Risk-weighted exposure amounts	
4	Total risk-weighted exposure amount	**11,720**
	Capital ratios (as a percentage of risk-weighted exposure amount)	
5	Common Equity Tier 1 ratio (%)	**286.66%**
6	Tier 1 ratio (%)	**286.66%**
7	Total capital ratio (%)	**286.66%**
	Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)	
EU 7a	Additional CET1 SREP requirements (%)	**18.36%**
EU 7b	Additional AT1 SREP requirements (%)	**24.49%**
EU 7c	Additional T2 SREP requirements (%)	**32.65%**
EU 7d	Total SREP own funds requirements (%)	**40.65%**
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)	
8	Capital conservation buffer (%)	**2.50%**
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	**0.00%**
9	Institution specific countercyclical capital buffer (%)	**1.97%**
EU 9a	Systemic risk buffer (%)	**0.00%**
10	Global Systemically Important Institution buffer (%)	**0.00%**
EU 10a	Other Systemically Important Institution buffer	**0.00%**
11	Combined buffer requirement (%)	**4.47%**
EU 11a	Overall capital requirements (%)	**45.15%**
12	CET1 available after meeting the total SREP own funds requirements (%)	**85.82%**
	Leverage ratio	
13	Leverage ratio total exposure measure	**81,071**
14	Leverage ratio	**41.44%**

Key metrics cont.

	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)	
EU 14a	Additional CET1 leverage ratio requirements (%)	0.00%
EU 14b	Additional AT1 leverage ratio requirements (%)	0.00%
EU 14c	Additional T2 leverage ratio requirements (%)	0.00%
EU 14d	Total SREP leverage ratio requirements (%)	3.00%
EU 14e	Applicable leverage buffer	0.00%
EU 14f	Overall leverage ratio requirements (%)	3.00%
EU 14g	Pillar 2 Leverage Ratio Guidance (%)	0.40%
EU 14h	OLRR + Pillar 2 Leverage Ratio Guidance (%)	3.40%

Key metrics cont.

	Liquidity Coverage Ratio	31-Mar-25	30-Jun-25	30-Sep-25	31-Dec-25
15	Total high-quality liquid assets (HQLA) (weighted value - in quarter)	**40,006**	67,146	75,052	78,830
EU 16a	Cash outflows (weighted value - in quarter)	**665**	15,255	25,174	31,673
EU 16b	Cash inflows (weighted value - in quarter)	**1,015**	158	214	72
16	Total net cash outflows (weighted value - in quarter)	**376**	15,097	24,959	31,601
17	Liquidity coverage ratio (%)	**10629.36%**	444.77%	300.70%	249.45%
	Net Stable Funding Ratio				
18	Total available stable funding	**48,550**	53,913	54,277	40,050
19	Total required stable funding	**4,305**	7,873	11,369	477
20	NSFR ratio (%)	**1128.00%**	684.77%	477.43%	8390.61%

Key metrics cont.

Overview of risk weighted exposure amounts

Overview of risk weighted exposure amounts EUR m	Risk weighted exposure amounts (RWEAs)	Total own funds requirements
Credit risk (excluding CCR)	0.95	0.1
Of which the standardised approach (SA)	0.95	0.1
Operational risk	10.77	0.9
Of which basic indicator approach (BIA)	10.77	0.9

Credit risk

ClearBank Europe uses the Standardised Approach ('SA') to calculate its Pillar 1 credit risk capital requirements. Under the SA, ClearBank Europe 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. As at 31 December 2025, ClearBank Europe's Credit Risk RWA was €0.95m, which required own funds of €0.08m to be held.

Operational risk

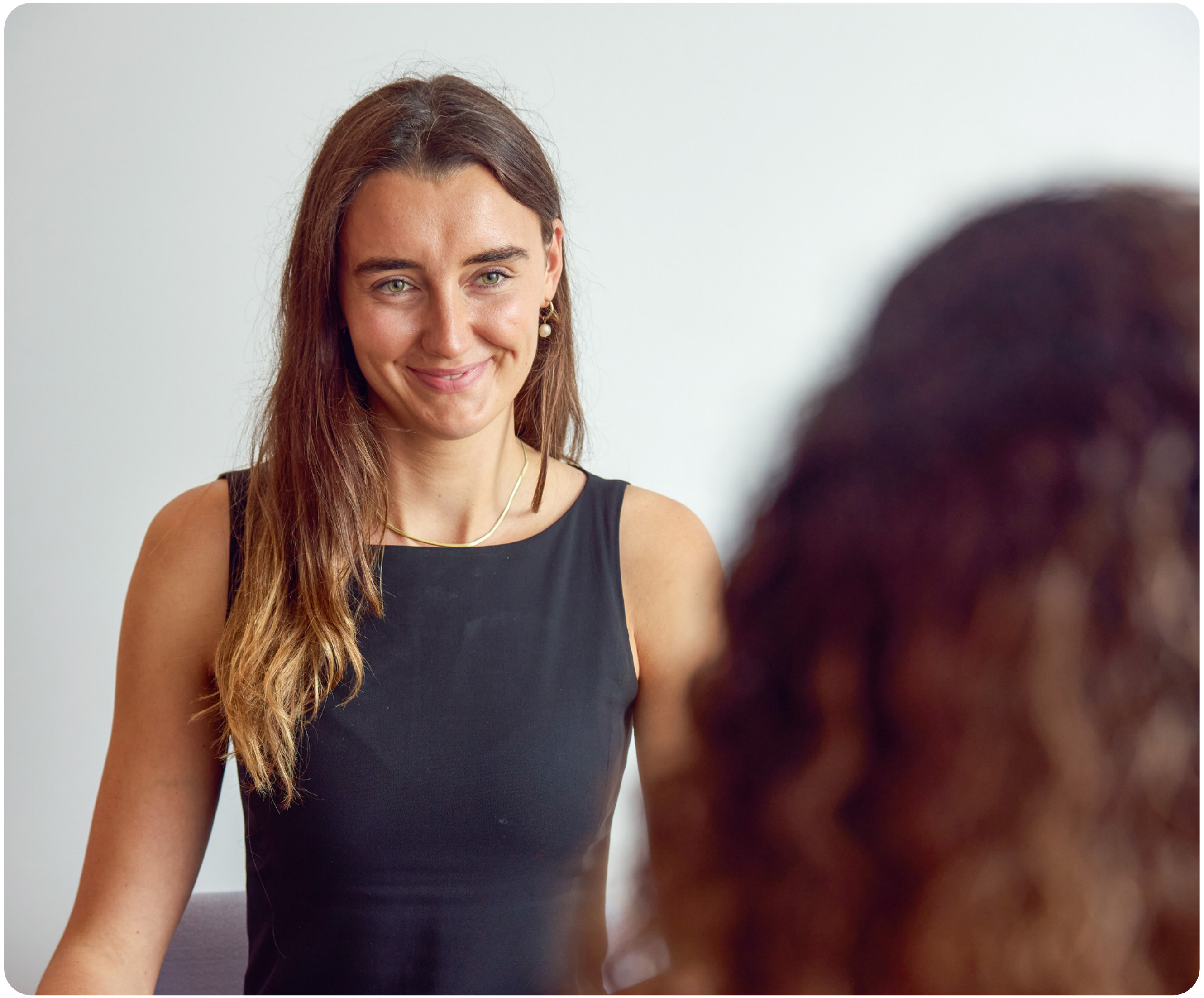
ClearBank Europe uses the Business Indicator Component for calculating its Pillar 1 operational risk capital requirements. Under this approach, ClearBank Europe applies a risk weight to the average of the past 3 years' audited revenue (or using forecasted revenue when historic audited numbers are not available) and is required to hold 8% of that risk weighted value as the minimum capital requirement for operational risk under Pillar 1. As of 31 December 2025, ClearBank Europe's Operational Risk RWA was €10.77m, which required own funds of €0.9m to be held.

Key metrics cont.

Liquidity and funding risk

The management of liquidity and funding risks aims to ensure that there are sufficient liquid assets, both as to amount and quality, to cover cash flow mismatches and fluctuations in funding, and 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.

The bank's Liquidity Coverage Ratio (LCR) in Q4 2025 was 249%, as mentioned in the Key Metrics introduction, which was well above the regulatory minimum of 100%. The bank continues to manage its liquidity against its internal risk appetite which is more prudent than the regulatory requirements. The bank exceeds the expected 100% minimum requirement for the Net Stable Funding Ratio (NSFR), with a ratio of 8,391% at Q4 2025. The bank 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, which is translated into a set of liquidity risk limits. The bank's liquid assets, which predominately comprise balances held at DNB and ECB, are managed by the Group Treasury function.

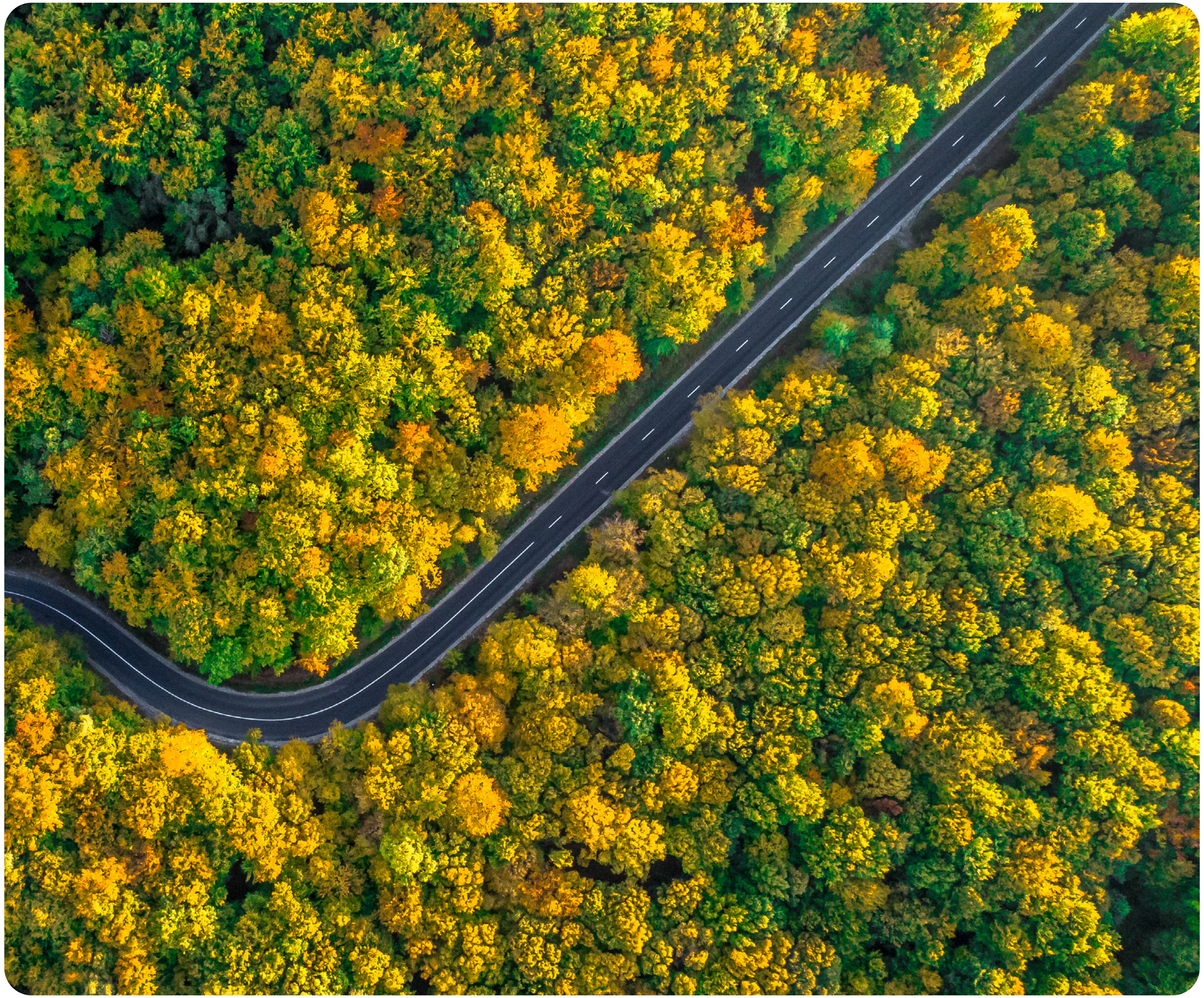


Environmental, Social and Governance (ESG) risks

Environmental, Social and Governance (ESG) risks

ESG risks are considered within ClearBank Europe's governance and risk management framework and are integrated into existing policies and oversight arrangements where relevant. ClearBank Europe's environmental and sustainability approach is aligned with that of the ClearBank Group, which in 2025 continued to embed sustainability across its operations and governance and is progressing towards its Net Zero commitments.

In line with Article 433b CRR, ClearBank Europe applies the principle of proportionality to its Pillar 3 disclosures. While Article 449a CRR introduces ESG disclosure requirements, it explicitly requires that disclosures reflect the size, complexity and relative ESG risk exposure of the institution. As a small and non complex institution with limited exposure to ESG risks, the ESG Pillar 3 disclosure templates are not considered applicable to ClearBank Europe for the year ended 31 December 2025.



Remuneration

Remuneration Policy and practices

This section provides details on the remuneration of the Management Board, Supervisory Board and employees of ClearBank Europe including the approach for material risk takers (MRT's) for the year ending 31 December 2025. MRT's are those individuals whose actions may have a material impact on the risk profile of ClearBank Europe. The company determines on an annual basis its MRT's. The HR department is responsible for the MRT identification methodology and process in consultation with the Risk function. The Nomination and Remuneration Committee oversees and approves the MRT identification methodology and process. ClearBank Europe engaged the external legal firm Osborne Clarke to establish its remuneration policy and has subsequently consulted this same firm in relation to certain amendments to that policy.

Vision on remuneration

As a growing bank, ClearBank Europe is committed to building a high-performing, ambitious team that will help ClearBank Europe scale and succeed in a competitive market. The bank's remuneration philosophy is designed to attract, retain, and reward top talent who drive business impact and embody its culture pillars. ClearBank Europe offers a compensation structure that combines a competitive base salary - benchmarked against the external market and reviewed twice per year based on defined pay principles - with a variable pay plan that recognises and rewards strong performance. To achieve its ambitions, ClearBank Europe strives to create a diverse and challenging work environment where individuals are empowered to grow their careers and contribute to something truly meaningful.

Nomination and Remuneration Committee

The Nomination and Remuneration Committee is authorised by the Supervisory Board to support in overseeing ClearBank Europe's remuneration policies and related matters. This Committee consists of 4 independent board members, including 1 committee chair. In this capacity, the Committee provides oversight and guidance to the Supervisory Board, the Company and its management, facilitates discussion and communication on remuneration topics and reviews the continuous adequacy of the remuneration policy, proposing amendments where appropriate.

In addition, the Committee assists the Supervisory Board in matters relating to board compensation and appointments. It provides guidance on the structure and composition of both the Supervisory Board and the Management Board, monitors the balance of skills, independence experience and diversity as well as the support of succession planning discussions. The Committee also makes recommendations regarding appointments to the Supervisory Board, Management Board and other key function holders. The full scope of the role and the responsibilities of the Committee are documented in its Terms of Reference. The Committee met formally 10 times in 2025.

Remuneration cont.

Variable remuneration at ClearBank Europe

At ClearBank Europe, performance related variable remuneration is governed by its remuneration policy and overseen by the Nomination and Remuneration Committee, in accordance with applicable laws and regulations. ClearBank Europe adheres to Dutch regulations regarding maximum variable remuneration, ensuring that performance related variable remuneration for employees who spend 50% or more of their time in the Netherlands does not exceed 20% of their fixed remuneration annually.

The bank's variable remuneration scheme is entirely discretionary and is contingent upon both the overall performance of ClearBank Europe and individual performance. Consequently, it is subject to periodic adjustments.

ClearBank Europe retains the discretion to pay variable remuneration partially or fully in shares or comparable instruments.

The allocation of individual variable remuneration is in alignment with the remuneration approach approved by the Nomination and Remuneration Committee, following the evaluation of individual employee performance by line managers and Management Board members. This evaluation is subsequently presented to the Nomination and Remuneration Committee for oversight and review. The individual performance of the Management Board members is assessed by the Supervisory Board.

When assessing employee performance and any associated variable remuneration, the following criteria are considered:

- What an employee has achieved in the relevant performance year; the outcomes, results and impact an individual delivers in line with their objectives
- How an employee has conducted themselves whilst working toward their objectives, in line with the ClearBank Culture Pillars and Behaviours

Non-financial criteria hold an equal weighting (50%) when evaluating personal performance and this has a direct impact on the associated variable remuneration.

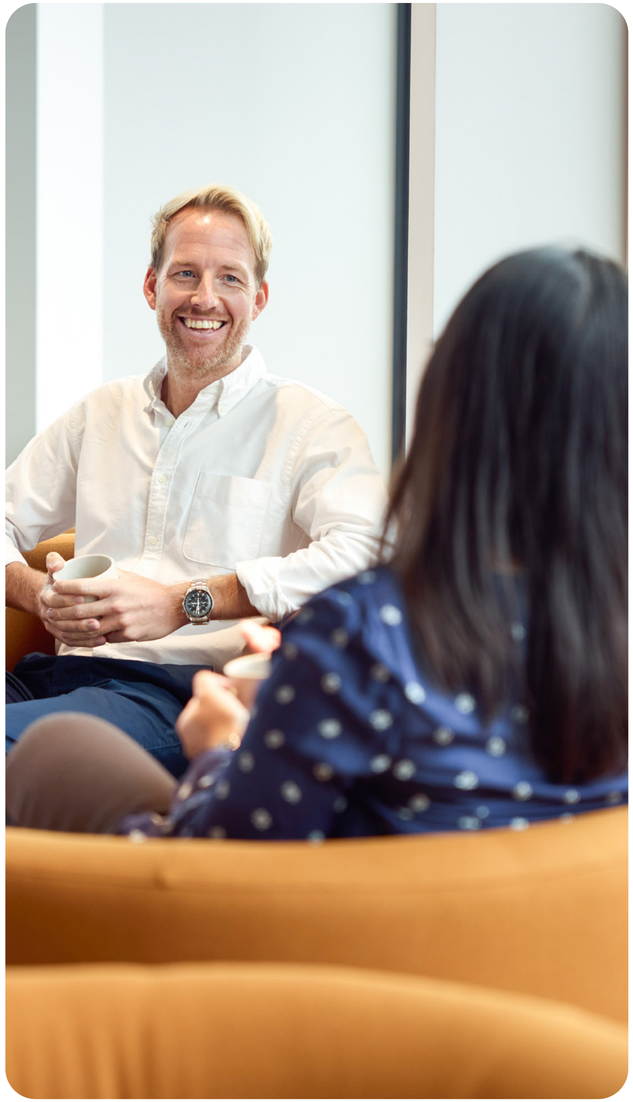
In 2025, no employees at ClearBank Europe earned more than EUR 1,000,000 per annum.

The total amount awarded in 2025 on all variable components (including guaranteed variable remuneration) to ClearBank Europe employees was EUR 1,076,828 (gross).

ClearBank Europe's policy on variable remuneration further allows for ex-post adjustments via malus and clawback rights. The Supervisory Board, on behalf of ClearBank Europe, is authorised to demand repayment of all or part of a variable remuneration.

During 2025 no variable remuneration has been subject to a clawback.

The 4 tables here below on remuneration include allocated staff from other ClearBank group entities.



Remuneration cont.

Remuneration awarded for the financial year (1 January- 31 December 2025)

Remuneration awarded for the financial year (€)		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Fixed remuneration	Number of identified staff	4	5	3	2
	Total fixed remuneration	520,150	1,352,325	468,817	349,387
	of which: cash-based	520,150	1,352,325	468,817	349,387
Variable remuneration	Number of identified staff	-	3	3	2
	Total variable remuneration	-	609,771	155,982	58,263
	of which: cash-based	-	312,930	1,533	58,263
	of which: deferred	-	-	-	-
	of which: shares or equivalent ownership interests	-	296,841	154,449	-
	of which: deferred	-	48,421	32,225	-
Total remuneration		520,150	1,962,096	624,799	407,650

Remuneration cont.

Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) (1 January – 31 December 2025)

	MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards				
Guaranteed variable remuneration awards - Number of identified staff	0	1	1	0
Guaranteed variable remuneration awards - Total amount		200,000	90,000	
Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap		200,000	90,000	
Severance payments awarded in previous periods and paid during the financial year				
Severance payments awarded in previous periods and paid during the financial year - Number of identified staff	0	1	0	0
Severance payments awarded in previous periods and paid during the financial year - Total amount		92,452		
Severance payments awarded during the financial year				
Severance payments awarded during the financial year - Number of identified staff	0	1	0	0
Severance payments awarded during the financial year - Total amount		312,930		
Of which paid during the financial year		312,930		
Of which deferred		0		
Of which severance payments paid during the financial year, that are not taken into account in the bonus cap		312,930		
Of which highest payment that has been awarded to a single person		312,930		

Remuneration cont.

Deferred remuneration (1 January - 31 December 2025)

Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year
MB Supervisory function	-	-	-	-	-	-
MB Management function	1,511,374	547,354	494,420	66,667	385,209	-
Of which: cash-based	-	-	-	-		-
Of which: shares or equivalent ownership interests	1,511,374	547,354	494,420	66,667	385,209	-
Other senior management	186,040	68,020	118,020	-		-
Of which: shares or equivalent ownership interests	186,040	68,020	118,020	-		-
Total amount	**1,697,414**	**615,374**	**612,440**	**66,667**	**385,209**	**-**

Remuneration cont.

Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) (1 January – 31 December 2025)

	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
Total number of identified staff										14
Of which: members of the MB	4	5	9							
Of which: other senior management							3			
Of which: other identified staff								2		
Total remuneration of identified staff	520,150	1,962,096	2,482,246				624,799	407,650		3,514,695
Of which: variable remuneration	-	609,771	609,771				155,982	58,263		824,016
Of which: fixed remuneration	520,150	1,352,325	1,872,475				468,817	349,387		2,690,680

Appendix

Self-assessment of compliance with the Disclosure part of the CRR in accordance with Art 433B

EU CRR reference	High Level Summary	Reference
435(1)(a)	Strategies and processes to manage material risks	pg. 6-10
435(1)(e)	A statement by the management body confirming that risk management is appropriate for the institution's strategy and risk profile	pg. 6-10
435(1)(f)	Concise risk statement describing the overall risk profile	pg. 6-10
438(c)	Upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process	N/A
438(d)	Total risk weighted exposure amount and corresponding own funds requirements, broken down by risk category	pg 11-15
438(da)	Disclosure of total risk exposure amounts (un floored) by risk type, where relevant	N/A
442(c)	Disclosure of performing, non performing and forborne exposures, together with related losses, provisions and credit risk mitigation	N/A
442(d)	An ageing analysis of accounting past due exposures	N/A
447	Disclosure of key metrics (capital, leverage and liquidity)	pg. 11-15
449a	Environmental, social and governance (ESG) risks (proportionate disclosure)	pg. 16
449b	Disclosure of aggregate exposure to shadow banking entities	N/A
450(1)(a)	Information on the decision making process for determining remuneration policy	pg. 17-22
450(1)(b)	Information about the link between pay of the staff and their performance	pg. 17-22
450(1)(c)	The most important design characteristics of the remuneration system	pg. 17-22
450(1)(d)	Ratios between fixed and variable remuneration	pg. 17-22
450(1)(h)	Aggregate quantitative remuneration information by senior management and identified staff	pg. 17-22
450(1)(i)	Number of individuals remunerated EUR 1 million or more per financial year	N/A
450(1)(j)	Total remuneration of each management body member, upon request of competent authority	N/A

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