

# **AIB Mortgage Bank Unlimited Company**

Directors' Report and Annual Financial Statements for the financial year ended 31 December 2022



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# Directors and other information

Independent Non-Executive Director and **Directors** Eamonn Quinn

Chair

appointed 12 July 2022

appointed 17 February 2023

Chris Curley **Executive Director** Gerry Gaffney **Executive Director** 

Yvonne Hill Independent Non-Executive Director

Andrew Maguire Independent Non-Executive Director

Conor McGrath Managing Director

James Murphy AIB Group Non-Executive Director Paul Owens Independent Non-Executive Director

**Company secretary** Diane Lumsden

10 Molesworth Street Registered office

> Dublin 2 Ireland

404926 Registered number

Registered auditor Deloitte Ireland LLP

> Chartered Accountants & Statutory Audit Firm Deloitte & Touche House

**Earlsfort Terrace** 

Dublin 2

Banker Allied Irish Banks, p.l.c.

10 Molesworth Street

Dublin 2 Ireland

**Solicitor** Helen Dooley

> **Group General Counsel** Allied Irish Banks, p.l.c. 10 Molesworth Street

Dublin 2 Ireland

**Covered-asset monitor** Mazars

**Harcourt Centre** 

Block 3 Harcourt Road Dublin 2 Ireland



The Directors of AIB Mortgage Bank Unlimited Company ('the Bank') present their Directors' Report (the 'Report') and audited financial statements for the financial year ended 31 December 2022. The Statement of Directors' responsibilities in relation to the financial statements is on page 50.

## **Principal activities**

The Bank, a public unlimited company, obtained an Irish banking licence under the Irish Central Bank Act, 1971 (as amended) and was registered as a designated mortgage credit institution under the Asset Covered Securities Act, 2001 on 8 February 2006.

The Bank is a wholly owned subsidiary of Allied Irish Banks, p.l.c. ('AIB'). The ultimate parent company of the Bank and AIB is AIB Group plc ('AIB Group').

The Bank's principal objective is to issue mortgage covered securities for the purpose of financing mortgage loans secured on residential property in accordance with the Asset Covered Securities Act, 2001 and the Asset Covered Securities (Amendment) Act 2007 ('the Asset Covered Securities Acts'). Such mortgage loans may be made directly by the Bank or may be purchased from AIB and other subsidiary undertakings of AIB or third parties. The Bank's debt securities are listed on the main securities market of Euronext Dublin.

The Bank's business activities are restricted, under the Asset Covered Securities Acts, to dealing in, and holding, mortgage credit assets and limited classes of other assets, engaging in activities connected with the financing and refinancing of such assets, entering into certain hedging contracts and engaging in other activities which are incidental to, or ancillary to, the above activities. In accordance with the Asset Covered Securities Acts, the Cover-Assets Monitor, Mazars, monitors compliance with the Asset Covered Securities Acts and reports independently to the Central Bank of Ireland ('CBI' or the 'Central Bank').

The Bank's activities are financed through the issuance of mortgage covered securities with the balance of funding being provided by AIB.

The majority of the Bank's activities are outsourced to AIB under an Outsourcing and Agency Agreement. AIB, as Service Agent for the Bank, originates residential mortgage loans through its retail branch network and other distribution channels in Ireland, services the mortgage loans, and provides treasury services in connection with financing as well as a range of other support services, including but not limited to Finance, Operations, IT, Risk and Compliance.

## Results for the financial year

The profit before taxation ('PBT') for 2022 amounted to €27m (2021: €23m), as set out in the income statement page 62.

Net interest income decreased to €284m for 2022, from €352m in 2021. The reduction is driven by higher funding costs due to increased market rates.

Other income increased to €695m in 2022 from €46m in 2021, an increase of €649m. This increase is principally due to €688m net trading income (2021: €48m), being the increase in mark to market value of derivatives which economically hedge interest rate risk on loans and advances to customers and which are not designated in a hedging relationship under IAS 39, driven by increased volatility in longer term interest rates at 31 December 2022, together with a gain on the sale of non-performing loan portfolios of €5m (2021: €5m loss).

Operating expenses increased to €955m in 2022, from €405m in 2021, an increase of €550m, driven by an increase of €567m in amounts payable to AIB as determined by the transfer pricing agreement between the Bank and AIB, largely a consequence of the increase in derivative mark to mark net trading income, offset by lower other operating expenses.

Net credit impairment writeback in 2022 was €3m (2021:€30m), a decrease of €27m. The net credit impairment writeback for 2022 reflected a net remeasurement of expected credit loss ('ECL') allowance charge of €5m, together with recoveries of amounts previously written-off of €8m. For further information see pages 12 to 40 in the risk management section.



## **Business review**

The global economy lost considerable momentum during 2022 after it had rebounded strongly in 2021 from the impact of the Covid-19 pandemic. The Russian invasion of Ukraine resulted in a sharp rise in commodity prices, especially energy and food prices. This contributed significantly to a sharp acceleration in inflation, which saw CPI rates rise to double-digit levels in both the UK and Eurozone. Central banks responded to the surge in inflation with a marked tightening of monetary policy that saw official rates rise by 250-425bps in the main Western economies in 2022.

The Irish economy continued to perform very well in 2022 and, in contrast to elsewhere, growth forecasts were revised higher during the year. According to preliminary CSO data, GDP rose by 12.2% in 2022, which was only slightly down on the 2021 figure of 13.6%. The CSO data show the economy grew strongly right throughout the year.

The Irish labour market maintained its strong performance in 2022. Continued net inward migration helped sustain solid growth in the workforce. Employment rose by a very strong 6.8% in 2022 and by end year was 9.2% above its pre-COVID end 2019 level. Meanwhile, the unemployment rate fell to 20-year lows. By the end of 2022, it stood at 4.4%, below its pre-Covid level of 4.8%.

House prices in Ireland continued their marked uptrend in 2022. The latest CSO data show prices were up by 7.8% year-on-year in December. House building activity picked up considerably in 2022, after been held back by Covid-related lockdowns in the previous two years. CSO data put house completions at just below 30,000, up 45% from circa 20,500 per annum in the period 2019-2021.

Meanwhile, official government data show housing commencements rose to a peak of 35,000 on a 12-month running total basis in the spring before falling back to 27,000 by the end of the year.

A notable feature of the pandemic was a very sharp increase in private sector savings in many economies, including Ireland. Savings were maintained at a very high level in 2022. This manifested itself in a further marked rise in levels of Irish banking deposits in 2022. These stood at €315bn in December, up from €286bn at the start of the year.

Mortgage lending continued to grow strongly in 2022, increasing by 34% to €14.1bn. However, the sharp rise was partly driven by a marked jump in switching activity.

The impact of the above factors on the Bank's financial performance, was an increase in customer loans of €810m (+ 4.8%) to €17,746m after new lending has exceeded loan repayments, notwithstanding cost of living and interest rate increases experienced during 2022.

The Bank continues to provide competitive home loans in the Irish market, offering a range of fixed and variable rates including Green 5 Year Fixed and High Value Fixed and through channel options including Branch and Digital. In addition the Bank offers a Switcher - legal fee support of €2,000 on all new loans switching to the bank from another lender. The Bank's main focus is to support viable owner-occupier customers, including first time buyers, home movers, home improvements and those switching their mortgage. During 2022, the Bank's priorities have been to continue to support customers, maintain strong capital position and improve operational resilience.

Mortgage pricing is kept under continuous review and during 2022, the European Central Bank increased rates by a total of 2.5% on four occasions between July and December 2022.

In response to the rising interest rate environment, the Bank increased interest rates applicable to tracker mortgages in line with ECB changes and increased the rates applicable to new fixed rate mortgages by 1% in Q4 2022.

The Minister for Finance published S.I. No. 576/2021 European Union (Covered Bonds) Regulations 2021 to transpose Directive (EU) 2019/2162 into Irish law on 3 November 2021. In accordance with the EU Covered Bonds Directive, the Irish Covered Bonds Regulations came into operation on 8 July 2022. The Bank has complied with the requirements of the new regulations as they apply to the issue and ongoing management of covered bonds and their related security. The Bank has applied to the CBI for approval of its Covered Bond Programme ('CBP') in accordance with the new regulations. The Bank cannot re-access the covered bond market for new issuances until approval of its CBP and associated prospectus is received from the CBI.

# **Asset Quality**

The Bank's loan portfolio before loss allowance increased by 4.5% during 2022 to €17,857m as at 31 December 2022, (2021: €17,080m) as new lending has exceeded repayments, non-performing loan portfolios sales and loan restructures, including write-offs by €777m during the year (2021: decrease of 2.3%).

The Bank's residential mortgage portfolio comprises €16,688m owner-occupier (2021: €15,641m) and €1,169m buy-to-let mortgages (2021: €1,439m).

Non-performing loans reduced from €367m at 31 December 2021 to €220m at 31 December 2022. This reduction was achieved through the sale of non-performing loan portfolios of €87m together with redemptions and repayments from customers of €60m. Non-performing loans as a percentage of gross loans and advances to customers decreased from 2.1% at 31 December 2021 to 1.2% at 31 December 2022, principally driven by loan sale transactions.



## **Asset Quality (continued)**

Expected credit loss provisions are €111m (2021: €144m). The Bank has taken a prudent approach to the determination of provisions, including recognition of the increase in the cost of living and interest rates experienced by borrowers in 2022. The significant reduction in the Bank's ECL level in 2022 is due to the disposal of non-performing loan portfolios.

The Bank has outsourced the management and servicing of its mortgage portfolio to AIB. AIB has credit policies and strategies, implementation guidelines and monitoring structures as adopted by the Bank to manage its mortgage portfolio, including restructured loans. AIB regularly reviews the performance of these restructured loans and has a dedicated team to focus on asset sales within the restructured portfolio.

AIB will continue to implement sustainable solutions for customers who engage with the Bank, where feasible. AIB continues to review all options in relation to reducing impaired loans including sales and strategic initiatives.

## **Funding activities**

At 31 December 2022, the total amount outstanding in respect of mortgage covered securities issued was €8,275m (31 December 2021: €9,525m), of which €1,025m was held by external debt investors (31 December 2021: €1,775m) and €7,250m by AIB (31 December 2021: €7,750m).

In 2022, the Bank did not issue covered bonds (2021: Nil). In 2022 covered bonds with a nominal value of €1,250m were redeemed on maturity (€750m: February 2022 External Investors and €500m: July 2022 Internal Issuance).

Despite surging inflation, geopolitical instability and monetary policy normalisation, the covered bond primary markets nonetheless observed a record-breaking amount of supply in 2022, with €204bn of issuance placed in one year. This represented almost twice the volumes observed in the prior two years, and was a post-Global Financial Crisis record. This volume of issuance was partly driven by the needs from European Banks to refinance upcoming TLTRO III maturities, following the announcement by the ECB that they would not be extending this facility during 2022.

The volume of issuance is particularly noteworthy given 2022 was the year that the ECB shifted towards monetary policy normalisation, including the end of quantitative easing. In June, the ECB announced they would cease net asset purchases via its Asset Purchase Programme ('APP') from 1<sup>st</sup> July. Prior to this, the ECB had embarked on an accelerated pace of tapering, announced in March, which saw monthly purchased step down from €40bn in April to €30bn in May and €20bn in June. With net asset purchases having concluded, the covered bond market has returned to the "reinvestment phase" that the ECB had adopted through most of 2019. Meanwhile, reinvestments under the Pandemic Emergency Purchase Programme ('PEPP'), via which the ECB purchased only a nominal amount of covered bonds, are set to continue until at least the end of 2024.

Much like the broader market, covered bond spreads were not immune to spread widening during 2022, albeit were significantly more robust and range-bound than the unsecured credit products.

The AIB Group Green Bond Framework which facilitates the issue of green bonds on an unsecured use of proceeds basis, includes a green residential property category. The Bank's Green Mortgage loans which meet minimum Building Energy Rating ('BER') rating eligibility criteria can be included as eligible loans for green bond issuance purposes. At 31st December 2022 €1.1bn of the Bank's Green Mortgages were assigned to the AIB Group's Green Bond Portfolio.

The ratings as at 31 December 2022 for the Bank's Covered Bond Programme, AIB and Ireland are shown below:

Poting Agonov	Covered Bond Programme	AIB	Ireland
Rating Agency	Covered Bond Programme	Issuer default rating	(Sovereign)
Moody's	Aaa	A3 (Stable)	A1 (positive outlook)
Standard & Poor's	AAA	BBB- (Stable)	AA- (positive outlook)

The ratings as at 31 December 2021 for the Bank's Covered Bond Programme, AlB and Ireland are shown below:

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Pating Aganey	Covered Rand Programme	AIB	Ireland
Rating Agency	Covered Bond Programme	Issuer default rating	(Sovereign)
Moody's	Aaa	Baa2 (negative outlook)	A2
Standard & Poor's	AAA	BBB (negative outlook)	AA-

In addition to covered bonds the Bank is funded by borrowings from its parent AIB. The balance at December 2022 was €8,578m (2021: €6,047m) an increase of €2,531m. The increase is primarily driven by the redemption of bonds in issue of €1,250m and increased total assets €1,268m in 2022.

## **Share Capital**

Information of the Bank's share capital is set out in note 24 to the financial statements.



## Capital resources and regulatory capital ratios

The objectives of the Bank's capital management policy are to at all times comply with regulatory capital requirements and to ensure that the Bank has sufficient capital to cover the current and future risk inherent in its business and to support its future development. Detail on the management of capital and capital adequacy risk can be found in 'Risk management on page 43.

The Bank's capital requirement at 31 December 2022 and 31 December 2021 were a minimum Common Equity Tier 1 ('CET1') of 10.5%, comprised of a Pillar 1 requirement of 8.0%, Capital Conservation Buffer ('CCB') of 2.5%. The CBI is reintroducing the Countercyclical Capital Buffer ('CCyB') for Irish exposures at 0.5% in June 2023, increasing to 1% in November 2023 and potentially increasing to 1.5% in 2024. The Bank's minimum capital requirement will increase accordingly.

At 31 December 2022, the fully loaded CET1 ratio was 21.5% (2021: 21.8%). The fully loaded total capital ratio was 26.4% (2021: 26.9%). The decrease is driven by higher Risk Weighted Assets ('RWAs').

## Minimum Requirement for Own Funds and Eligible Liabilities ('MREL')

At 31 December 2022, the Bank has an MREL ratio of 8.45% based on the leverage exposure measure.

The intermediate binding target is 5.91% of leverage exposure measure.

## Leverage ratio

The leverage ratio at 31 December 2022, was 6.85% (2021: 7.16%) on a fully loaded basis and 6.88% (2021: 7.25%) on a transitional basis. The regulatory requirement at 31 December 2022 is 3%.

## Risk management

The Bank adopts the same risk management framework and risk mitigation initiatives as AIB. The risk management framework provides a Group-wide definition of risk and lays down principles of how risk is to be identified, assessed, measured, monitored and controlled/mitigated, and the associated allocation of capital against same. Further information in relation to risk management, including the principal risks and uncertainties facing the Bank, as required under the terms of the European accounts Modernisation Directive (2003/51/EEC) (implemented in Ireland by the European Communities (International Financial Reporting Standards and Miscellaneous Amendments) Regulations 2005) is set out in the risk management report on pages 12 to 49.

- Credit risk;
- Liquidity and funding risk;
- Capital adequacy risk;
- Market risk;
- Operational risk;

- Regulatory compliance risk;
- Conduct risk;
- People and culture risk;
- Business model risk; and
- Model risk.

## **Outlook for 2023**

All the main official international forecasters are projecting a challenging year for the global economy in 2023 as high inflation, much tighter financial conditions, less supportive stance of fiscal policy and continuing elevated levels of uncertainty on the pace of activity. A recession is anticipated in the UK, with the Eurozone and US economy stagnating. Labour markets remain tight, though, so the rise in unemployment is expected to be less pronounced than in previous downturns.

The Irish economy is not immune to these trends and the pace of growth here is set to slow appreciably in 2023. However, the Irish economy is still expected to continue to outperform. The IDA has indicated that there is a continuing positive pipeline of foreign direct investment into H1 2023. The public finances have returned to budget surpluses allowing fiscal policy to remain supportive of economic activity. Private sector balance sheets are characterised by low debt levels and high savings. Thus, most forecasts are for Irish GDP to grow by between 3% and 5% in 2023.

House price growth in Ireland is expected to moderate but remain positive due to the ongoing supply shortfall, high savings and a relatively strong labour market.

The CBI announced a change in Macro Prudential rules relating to mortgage lending on the 19th October, which took effect on 1st January 2023. The main changes were increases in the Loan to Income Limit for First-time buyers from 3.5 to 4 times income and the Loan to Value limit for second and subsequent buyers from 80% to 90%.

In response to changes in the ECB and market rates the bank continues to keep mortgage pricing under review.



## Sustainability and climate change

As a subsidiary of AIB Group, the Bank continues to integrate climate risk into its overall risk management approach and broader sustainability strategy. AIB Group maintains oversight of climate-related metrics on the Group Scorecard and is committed to ensuring the Group's operations will be at net zero by 2030. In support of AIB's sustainability strategy the Bank offers a Green 5 year fixed rate mortgage available to new and existing owner occupier customers. This offering is available to customers whose property has a BER of between A1-B3 inclusively. Green Mortgages accounted for 36% of the Bank's new lending in 2022. The Bank is committed to continue supporting customers' transition to a low carbon economy with enhanced green products, propositions and support.

## Going concern

The financial statements for the financial year ended 31 December 2022 have been prepared on a going concern basis as the Directors are satisfied, having considered the principal risks and uncertainties impacting the Bank, that it has the ability to continue in business for the period of assessment. The period of assessment used by the Directors is at least 12 months from the date of approval of these annual financial statements.

The Bank is dependent on AIB for continued funding and is therefore dependent on the going concern status of the parent. The financial statements of AIB have been prepared on a going concern basis.

In making their assessment, the Directors of AIB have considered a wide range of information relating to present and future conditions. These included financial plans covering the period 2023 to 2025, liquidity and funding forecasts and capital resources projections, all of which were prepared under base and stress scenarios

In addition, the Directors of the Bank considered the principal risks and uncertainties which could materially affect the Bank's future business performance and profitability and which are outlined on pages 12 to 49.

There is no intention to liquidate the company or cease trading and the Bank is not aware of any material uncertainties related to conditions or events that may cast significant doubt upon the Bank's ability to continue as a going concern. In addition, the Bank's parent AIB has provided a letter of financial support to the Bank.

On the basis of the continued availability of funding from AIB to the Bank the Board approved financial plans 2023 - 2025, the Directors of the Bank believe that it is appropriate to prepare the financial statements on a going concern basis.

## Directors' and Secretary's interests in shares

The Directors and Company Secretary did not hold any interests in the Bank's shares or debentures at the beginning of the year, during the year or at the year end, pursuant to Section 267 and 329 of the Companies Act 2014.

Shares held in the ultimate parent company AIB Group plc were below 1% of the issued share capital and not disclosable pursuant to Section 260 of the Companies Act 2014.

## **Share options**

Share options were not granted or exercised during the year. Independent Non-Executive Directors do not participate in share option schemes.

## Long term incentive plans

There were no conditional grants of awards of ordinary shares outstanding to Executive Directors or the Company Secretary at 31 December 2022. Independent Non-Executive Directors do not participate in long term incentive plans.

There were no changes in the Directors' and Secretary's interests between 31 December 2022 and 6 March 2023.

## **Dividend**

There was no interim dividend paid to the shareholder during 2022 and the Board is not recommending the payment of a final dividend for 2022 (2021: nil).

## **Accounting policies**

The principal accounting policies, together with the basis of preparation of the financial statements, are set out in note 1 to the financial statements.

## **Political donations**

The Directors have satisfied themselves that there were no political contributions during the year that require disclosure under the Electoral Act 1997.

## **Corporate Governance**

The Corporate Governance Statement on pages 9 to 11 forms part of the Directors' report



## **Branches outside the State**

The Bank has not established any branches outside the State.

## Disclosure notice under section 33AK of the Central Bank Act 1942

The Bank did not receive a Disclosure Notice under Section 33AK of the Central Bank Act 1942 during 2022.

## Adequate accounting records

The Directors have complied with the requirements of Sections 281 to 285 of the Companies Act 2014 with regard to adequate accounting records by ensuring that AIB allocate adequate resources with appropriate expertise to the financial function under the Outsourcing and Agency Agreement, for the provision of accounting and other financial services to the Bank. The Directors monitor AIB's performance against agreed service levels through receipt of regular reports covering the services provided. The accounting records of the Bank are maintained at the registered office of its ultimate parent at AIB Group plc, 10 Molesworth Street, Dublin 2, Ireland.

## Non-adjusting events after the reporting period

There have been no significant events affecting the Bank since the reporting date which require amendment to or disclosure in the financial statements.

## **Statement of Relevant Audit Information**

Each of the Persons who is a Director at the date of approval of this Report confirms that:

- (a) so far as the Director is aware, there is no relevant audit information of which the Bank's Auditor is unaware; and
- (b) the Director has taken all steps that they ought to have taken as a Director in order to make themselves aware of any relevant audit information and to establish that the Bank's Auditor is aware of that information.

This confirmation is given and should be interpreted in accordance with the provisions of section 330 of the Companies Act 2014.

## Independent auditor

Deloitte Ireland LLP ('Deloitte'), were appointed as auditor to the Bank on 28 June 2013 following shareholder approval at the 2013 Annual General Meeting ('AGM') on that date. Their continued appointment as Auditor to the Bank was approved in 2022 by written resolution of the shareholder, in lieu of an AGM, and they shall continue to hold office until the conclusion of the next AGM, pursuant to section 383(2) of the Companies Act 2014.

A formal external audit tender process was completed by the Group Audit Committee on behalf of the Board and PricewaterhouseCoopers ('PwC') have been selected by the Board as the proposed new Statutory Auditors in respect of the financial year ending 31 December 2023. A shareholder resolution is required for the appointment of the new Statutory Auditors and the Board is recommending that PwC be appointed.

Subject to shareholder approval of PwC as the Bank's new Statutory Auditor, Deloitte, having served as the Bank's Statutory Auditor for the maximum legally permitted unbroken tenure in office of 10 years, intend to resign upon conclusion of the 2022 financial year end process. Deloitte have confirmed, in accordance with Section 400 of the Companies Act, that there are no circumstances connected with their resignation which should be brought to the attention of the members or Creditors of the Bank.

On behalf of the Board,

Eamonn Quinn

Chair

Conor McGrath

Managing Director

6 March 2023



# Corporate governance report

## Corporate governance

A key objective of the Bank's governance framework is to ensure compliance with applicable legal and regulatory requirements.

## Corporate governance requirements

The Bank's corporate governance practices are designed to ensure compliance with applicable legal and regulatory requirements including, Irish company law and the Listing Rules applicable to debt listings of the Main Securities Market of Euronext Dublin.

The Bank is subject to the provisions of the Central Bank of Ireland Corporate Governance Requirements for Credit Institutions 2015 ("the Requirements"), which imposes minimum core standards upon all credit institutions licensed or authorised by the CBI. The Bank is designated as a "high impact institution" for the purposes of the Requirements. The Bank sought and received derogations from a number of the obligations imposed on high impact institutions, namely:

- Derogation granted from the requirement for the Board to have seven directors on the basis that it continues to be of sufficient size and expertise to oversee adequately the operations of the credit institution.
- Derogation granted from the requirement for the Board to have at least three independent non-executive directors ('INEDs') on the basis that the Board continues to have at least 2 independent INEDs.
- Derogation granted from the requirement to have an external evaluation of Board effectiveness carried out every three years, on the basis that the Bank continues to conduct an internal review of its own performance and that of its individual directors annually and that this exercise is led by the Chairman.
- Derogation granted from the requirement for the Board to meet at least six times per calendar year, on the basis that the Board will continue to meet at least four times per calendar year and at least once every quarter.
- Derogation granted to rely on the following AIB Committees: AIB Board Risk Committee, AIB Remuneration Committee and AIB Nomination and Corporate Governance Committee.
- Derogation granted from the requirement for cross committee membership on the basis that the Bank has only one sub-committee.
- The Bank has received approval from the CBI that the Chief Risk Officer ('CRO') of AIB Group acts as the CRO
  of the Bank on an outsourced basis and a Designated Risk Representative ('DRR') has been appointed for the
  Bank for maintaining and monitoring the effectiveness of the credit institution's risk management system. The
  appointed DRR has a direct reporting line to the CRO.

## Compliance with the requirements

- Mr Eamonn Quinn was appointed as Chair of the Board on 12 July 2022 following Board and Regulatory approval. Requirement 8.1 of the Code requires the Bank to have a Chair in place at all times and as such the Bank was non-compliant with this requirement in 2022 up until Mr Quinn's appointment on 12 July 2022. The Board put in place interim governance arrangements including the appointment of an Interim Deputy Chair in January 2022 who ensured that the Chair's responsibilities and duties were appropriately and effectively discharged up until the appointment of a new Chair.
- The Bank notified the CBI of this non-compliance during the required timeframe. There was no known negative
  impact on the governance and financial position of the Bank, nor was there deemed to be any poor outcomes for
  its customers.
- Following a robust review and challenge in regards to the adequateness of the mitigants established in respect
  of the period of non-compliance with Requirement 8.1, the Board concluded that the Bank is materially compliant
  with the provisions of the Requirements.

## The Board of Directors

Governance is exercised through a Board of Directors ("the Board") and a senior management team. The Board is responsible for corporate governance encompassing leadership, direction and control of the Bank and is responsible for financial performance to its shareholder and ultimate parent AIB Group plc.

Following the appointment of Eamonn Quinn as Independent Non-executive Director and Chair of the Board on 12 July 2022, the Board was comprised of seven Directors for the remainder of 2022. The Directors during 2022 were namely, Eamonn Quinn, Chris Curley, Gerry Gaffney, James Murphy, Conor McGrath (Managing Director), Yvonne Hill and Paul Owens. On 17 February 2023 Andy Maguire received regulatory approval and was appointed to the Board.

The Board is responsible for ensuring that appropriate systems of internal controls and risk management are maintained, specifically the Board sets the Risk Appetite Statement ('RAS') and the Bank's annual financial plans. The Bank benefits as a subsidiary of AIB from the wider AIB governance and operating structure, such as oversight of audit and risk related activities. AIB provides services to the Bank through an Outsourcing and Agency Agreement, updates in respect of the performance against agreed service levels which are provided to the Board regularly.

In the event that material failings or weaknesses in the systems of risk management or internal control are identified, an explanation of the issue and an assessment of its impact is presented to the Board together with a proposed remediation plan. Agreed remediation plans are tracked to conclusion, with status updates provided to the Board.



# Corporate governance report

## The Board of Directors (continued)

Given the work of the Board and representations made by the management team during the year, the Board is satisfied with the risk management and internal control framework and that the appropriate action would be taken to address any material failings or weaknesses identified through its operation.

The Bank has robust governance arrangements, which include a clear organisational structure with well defined, transparent, and consistent lines of responsibility, effective processes to identify, manage, monitor and report the risks to which it is or might be exposed, and adequate internal controls, including sound administrative and accounting procedures, IT systems and controls. The Board receives regular updates on the Bank's risk profile through the Bank's quarterly risk report and additionally through the attendance by the DRR at the Bank's quarterly Board meetings. The Board receives updates in respect of the outcomes of internal and external audit activities, via reporting at the Audit Committee and Board, respectively.

## Financial reporting processes

The Board, supported by the Audit Committee, rely on AlB's internal control and risk management systems in relation to the financial reporting process. Such systems are designed to manage rather than eliminate the risk of failure to achieve the Bank's financial reporting objectives and can only provide reasonable and not absolute assurance against material misstatement or loss. The Board, through AlB's established processes regarding internal control and risk management systems ensures effective oversight of the financial reporting process. The Bank's overall control system around the financial reporting process includes:

- clearly defined organisation structure and authority levels with reporting mechanisms to the Board;
- a comprehensive set of policies and procedures, in line with AIB, relating to the controls around financial reporting and the process of preparing the financial statements; and
- ensuring the integrity of the financial statements and the accounting policies therein.

The Board evaluates and discusses significant accounting and reporting issues as the need arises.

### **Audit Committee**

In accordance with section 1551 of the Companies Act 2014 and Requirement 19.1 of the Requirements, the Directors confirm that an Audit Committee ("the Committee") is established. The Board is assisted in the discharge of its duties by this Committee which was composed of three Non-Executive Directors for 2022 and which operates under Terms of Reference approved by the Board.

Ms. Hill (Chair) and Mr. Owens are INEDs and they each possess the requisite degree of independence so as to be able to contribute effectively to the Committee's functions. Mr. Murphy is deemed to be a Non-Executive Director by virtue of the role he fulfils in an area of AIB unrelated to the Bank's operations.

During 2022, the Committee, had oversight responsibility for audit matters including, inter alia:

- the quality and integrity of the Bank's accounting policies, financial and narrative reports and disclosure practices:
- the independence and performance of the External Auditor ("the Auditor") and Internal Audit, duly liaising with the AIB Group Board Audit Committee on matters in relation to the Auditor and Internal Audit, as necessary; and
- the adequacy of arrangements by which staff may, in confidence, raise concerns about possible improprieties in matters of financial reporting or other matters and the effectiveness of the Bank's internal control, risk management, and accounting and financial reporting systems.

These responsibilities are discharged through its meetings with and receipt of reports from management including Group Finance, Group Internal Audit, Group Risk and Group Compliance. During 2022, the Committee met formally on six occasions and, amongst other activities, the Committee reviewed the Bank's annual financial statements and related accounting policies, key judgements and practices; reports on compliance; the effectiveness of internal controls; including the effectiveness of controls operated under the Outsourcing and Agency Agreement; and the findings, conclusions and recommendations of the Auditor and Internal Auditor. The Committee satisfied itself through regular reports from the Internal Auditor, Risk, Compliance and the Auditor that the system of internal controls was effective.

The Committee ensures that appropriate measures are taken into consideration and addresses control issues identified by Internal Audit and the Auditor.

The Audit Committee Chair engaged with the AIB Group Board Audit Committee during the course of 2022, including attending the July 2022 Group Board Audit Committee meeting to provide an update on the key themes and discussions at the Audit Committee meetings for the period July 2021 to June 2022.



# Corporate governance report

Attendance at Board and Audit Committee Meetings during 2022

Directors' Attendance at Board Meetings during 2022							
	Eligible to attend	Attended					
Eamonn Quinn* - Independent Non-Executive Director and Chair	3	3					
Chris Curley - Executive Director	7	7					
Gerry Gaffney - Executive Director	7	7					
Yvonne Hill - Independent Non-Executive Director	7	7					
Conor McGrath - Managing Director	7	7					
James Murphy - AIB Group Non-Executive Director	7	7					
Paul Owens - Independent Non-Executive Director	7	7					

<sup>\*</sup> The Chair, Eamonn Quinn was eligible to attend 3 Board meetings in 2022 due to being appointed as Chair of the Bank on 12 July 2022.

Members' Attendance at Audit Committee Meetings during 2022						
Eligible to attend Attended						
Yvonne Hill	6	6				
James Murphy	6	6				
Paul Owens	6	6				



#### 1. Introduction

All of the Bank's activities involve, to varying degrees, the measurement, evaluation, acceptance and management of risks which are assessed across AIB Group. Certain risks can be mitigated by the use of safeguards and appropriate systems and actions which form part of AIB Group's Risk Management Framework. The Bank experiences similar risks and uncertainties facing AIB Group and adopts the same risk mitigation initiatives as AIB Group.

## Risk management framework

The Bank relies on AIB Group's framework and its supporting policies, processes and governance. For more information on the operation of the Board of the Bank see pages 9 to 11 of this Report.

## Individual risk types

This section provides details of the exposure to, and risk management of, the following individual risk types which have been identified through AIB Group's material risk assessment process and which are relevant to the Bank:

- 3.1 3.2 Liquidity and funding risk;
- 3.3 Capital adequacy risk;
- 3.4 Market risk;
- 3.5 Operational risk:
- 3.6 Regulatory compliance risk;
- 3.7 Conduct risk;
- 3.8 People and culture risk;
- 3.9 Business model risk; and
- 3.10 Model risk.



## 3.1 Credit risk

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

Based on the annual risk identification and materiality assessment, credit risk can be categorised into the following two sub categories;

- i. Counterparty risk: The risk of losses arising as a result of the counterparty not meeting their contractual obligations in full and on time and the resulting credit default risk / risk of loss leading to a risk to capital; and
- ii. Concentration risk: The risk of excessive credit concentration including to an individual, counterparty, group of connected counterparties, a type of collateral or a type of credit facility.

The most significant credit risks assumed by the Bank arise from mortgage lending activities to customers in the Republic of Ireland. Credit risk also arises on funds placed with other banks, derivatives relating to interest rate risk management and 'off-balance sheet' commitments.

## Credit risk management

The activities which govern the management of credit risk within the Bank are as follows:

- Establish governance authority fora to provide independent oversight and assurance to the Board with regards to credit risk management activities and the quality of the credit portfolio;
- Formulate and implement a comprehensive credit risk strategy that is viable through various economic cycles, supported by a suite of credit policies, is aligned to the Bank's approved Risk Appetite Statement and generates appropriate returns on capital within acceptable levels of credit quality;
- Operate within a sound and well defined credit granting process, within which risks for new and existing lending exposures, including connected exposures, are consistently identified, assessed, measured, managed, monitored and reported in line with risk appetite and the credit risk policies;
- Ensure all management and staff involved in core credit risk activities across the three lines of defence are fully capable of conducting their duties to the highest standard in compliance with the Bank's policies and procedures;
- Establish and enforce an efficient internal review and reporting system to manage effectively the Bank's credit risk
  across various portfolios including, establishing and enforcing internal controls and assurance practices to ensure
  that exceptions to policies, deviations to credit standards and limits are monitored and reported in a timely manner for
  review and action;
- Ensure a sound methodology exists and credit policies are in place to proactively assess credit risk, to identify
  deteriorating credit quality and take remedial action to minimise losses, provide customers with affordable and
  sustainable solutions and maximise recovery for the Bank. This includes consideration of, and the granting of,
  forbearance measures;
- Utilise quality management information and risk data of appropriate quality, to ensure an effective credit risk management and measurement process when reporting on the holistic credit risk profile of the Bank, including any changes in credit risk profile and emerging or horizon risks;
- Mitigate potential credit risk arising from new or amended products or activities, including the identification and analysis of existing and potential risks inherent in any credit product or activity; and
- Develop and continuously reinforce a strong, credit risk focused culture across the credit risk management functions through the credit cycle, which supports the Bank's goals and enables business growth, provides constructive challenge and avoids credit risks that cannot be adequately measured.

## **Bank Risk Appetite Statement ('RAS')**

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



## 3.1 Credit risk

## Credit risk principles and policy\*

The Bank implements and operates policies to govern the identification, assessment, approval, monitoring and reporting of credit risk. The Bank relies on AIB Group credit risk framework and its supporting policies, processes and governance. The AIB Group Credit Risk Framework and AIB Group Credit Risk Policy are overarching AIB Group Board approved documents which set out the principles of how AIB Group identifies, assesses, approves, monitors and reports credit risk to ensure robust credit risk management is in place. These documents contain the minimum standards and principles that are applied across AIB Group to provide a common, robust and consistent approach to the management of credit risk. AIB Group Credit Risk Policy is supported by a suite of credit policies, standards and guidelines which define in greater detail the minimum standards and credit risk metrics to be applied for specific products, business lines, and market segments.

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

## Credit approval overview

The Bank operates credit approval criteria which:

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

Credit risk approval is undertaken by professionals operating within a defined delegated authority framework. AIB Group Board is the ultimate credit approval authority. AIB Group Board has delegated credit authority to various credit committees and to the Chief Credit Officer (CCO). The CCO is permitted to further delegate this credit authority to individuals within AIB Group on a risk appropriate basis. Credit limits are approved in accordance with the Bank's written risk policies and guidelines. All exposures above certain levels require approval by the AIB Group Credit Committee ('GCC') and/or AIB Group Board. Other exposures are approved according to a system of tiered individual authorities which reflect credit competence, proven judgement and experience. Depending on the borrower/connection, grade or weighted average facility grade and the level of exposure, limits are sanctioned by the relevant credit authority. Material lending proposals are referred to credit units for independent assessment/approval or formulation of a recommendation and subsequent adjudication by the applicable approval authority.

## Credit risk organisation and structure

The Bank's credit risk management systems operate through a hierarchy of lending authorities. The Bank relies on the AIB Group credit risk framework and its supporting policies, processes and governance. All customer mortgage applications are subject to a credit assessment process. The role of AIB Group Credit Risk function is to provide direction, independent oversight and challenge of credit risk-taking.

## Internal credit ratings\*

One of the objectives of credit risk management is to accurately quantify the level of credit risk to which the Bank is exposed through the initial credit approval and ongoing review process. All relevant exposures are assigned to a rating model and within that to an internal risk grade (rating). A grade is assigned on the basis of rating criteria within each rating model from which estimates of probability of default ('PD') are derived.

Internal credit grades are fundamental in assessing the credit quality of loan exposures, and for assessing capital requirements for, portfolios where prior Regulatory approval has been received. Internal credit grades are key to management reporting, credit portfolio analysis, credit quality monitoring and in determining the level and nature of management attention applied to exposures. Changes in the objective information are reflected in the credit grade of the borrower/loan with the resultant grade influencing the management of individual loans. In line with the Bank's credit management lifecycle, heightened credit management and special attention is paid to lower quality performing loans or 'criticised' loans and non-performing/defaulted loans which are defined below.

Using internal models, the Bank has designed and implemented a credit grading masterscale that gives it the ability to categorise and contrast credit risk across different rating models and portfolios in a consistent manner. Masterscale consolidates complex credit information into a single attribute, aligning the output from the risk models with the Bank's Forbearance and Definition of Default ('DoD') and Credit Impairment policies.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Internal credit ratings\* (continued)

Masterscale grades are driven by grading model appropriate PDs combined with other asset quality indicators such as default, forbearance and arrears in order to provide the Bank with a mechanism for ranking and comparing credit risk associated with a range of customers. Masterscale categorises loans into a broad range of grades which can be summarised into the following categories: strong/satisfactory grades, criticised grades and non-performing/default loans.

In addition to the internal credit ratings, the IFRS 9 PD modelling approach uses a combination of rating grades and scores obtained from these credit risk models along with key factors such as age of an account, the current/recent arrears status or the current/recent forbearance status and macroeconomic factors to obtain the relevant IFRS 9 12 month and Lifetime PDs (i.e. point in time). The Bank has set out its methodologies and judgements exercised in determining its ECL under IFRS 9 on pages 19 to 40.

## Strong/satisfactory

Accounts are considered strong/satisfactory if they have no current or recent credit distress and the PD is typically less than 6.95%, they are not in arrears and there are no indications that they are unlikely to repay.

Strong (typically with PD less than 0.99%): Strong credit with no weakness evident.

**Satisfactory** (typically with PD greater than or equal to 0.99% and less than 6.95%): Satisfactory credit with no weakness evident.

### Criticised

Accounts of lower quality and considered as less than satisfactory are referred to as criticised and include the following: **Criticised watch:** The credit is exhibiting weakness in terms of credit quality and may need additional management attention; the credit may or may not be in arrears.

**Criticised recovery:** Includes forborne cases that are classified as performing including those which have transitioned from non-performing forborne, but still require additional management attention to monitor for re-default and continuing improvement in terms of credit quality.

## Non-performing/default

The Bank's definition of default is aligned with the EBA 'Guidelines on the application of the definition of default' under Article 178 of Capital Requirements Regulation and ECB Banking Supervision Guidance to Banks on non-performing loans.

The Bank has aligned the definitions of 'non-performing', 'classification of default' and IFRS 9 Stage 3 'credit impaired', with the exception of loans measured at fair value through profit and loss, and those loans which have been derecognised and newly originated in Stage 1 or POCI (Purchased or Originated Credit Impaired) which are no longer classified as credit impaired but continue to be classified as non-performing and in default. This alignment ensures consistency with the Bank's internal credit risk management and assessment practices.

Loans are identified as non-performing or defaulted by a number of characteristics. The key criteria resulting in a classification of non-performing are:

- Where the Bank considers a borrower to be unlikely to pay their loans in full without realisation of collateral, regardless of the existence of any past-due amount, or
- The borrower is 90 days or more past due on any material loan. Day count starts when any material amount of principal, interest or fee has not been paid by a borrower on the due date.

The Bank's definition of financial distress and forbearance are included in AIB Group's Forbearance policy. Identification of non-performing exposures and unlikeliness to pay are included in AIB Group's DoD and Credit Impairment policy.

# Credit risk monitoring\*

The Bank has developed and implemented processes and information systems to monitor and report on individual credits and credit portfolios in order to manage credit risk effectively. It is the Bank's practice to ensure that adequate up to date credit management information is available to support the credit management of individual account relationships and the overall loan portfolio.

Credit risk, at a portfolio level, is monitored using key risk indicators and early warning indicators which are reported regularly to senior management of the Bank and at AIB Group Board Risk Committee. Credit managers proactively manage credit risk exposures at a transaction and relationship level. Monitoring includes credit exposure and excess management, regular review of accounts, being up to date with any developments in customer circumstances, obtaining updated financial information and monitoring of covenant compliance. This is reported on a regular basis to senior management and includes commentary on loan book, quality of the loan book by Stage and expected credit loss P&L drivers.

\*Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Credit risk monitoring\* (continued)

The Bank allocates significant resources to ensure ongoing monitoring and compliance with approved risk limits. Credit risk, including compliance with key credit risk limits, is reported monthly. Once an account has been placed on a watch list, the exposure is carefully monitored and where appropriate, exposure reductions are effected.

Borrowers are subject to an 'unlikely to pay' test in conjunction with any forbearance assessment, or on identification of any material adverse change or event in their credit risk profile.

Through a range of forbearance solutions, the Bank employs a dedicated approach to loan workout, monitoring and proactive management of non-performing loans. A specialised recovery function focuses on managing the majority of criticised loans and deals with customers in default, collection or insolvency. Their mandate is to support customers in difficulty while maximising the return on non-performing loans. Further details on forbearance are set out on page 39 and 40.

## Credit risk mitigants\*

The perceived strength of a borrower's repayment capacity is the primary factor in granting a loan. However, the Bank uses various approaches to help mitigate risks relating to individual credits, including transaction structure, collateral and guarantees. Collateral and/or guarantees are usually required as a secondary source of repayment in the event of a borrower's default. The main types of collateral for loans and advances to customers are described below under the section on Collateral. Credit policy and credit management standards are controlled and set centrally by the Credit Risk function.

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

## Collateral

Credit risk mitigation may include a requirement to obtain collateral as set out in AIB Group's lending policies. Where collateral and / or guarantees are required, they are usually taken as a secondary source of repayment in the event of a borrower's default. AIB Group maintains policies which detail the acceptability of specific classes of collateral.

The principal collateral types for loans and advances are mortgage / legal charge over residential real estate.

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

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

## Methodologies for valuing collateral

Details on the valuation rule methodologies applied and processes used to assess the value of property assets taken as collateral are described in AIB Group's Property Valuation Policy and Property Valuation Guidance and are both reviewed annually.

As mortgage loans comprise of all of the Bank's loans and advances portfolio, some key principles have been applied in respect of the valuation of property collateral held by the Bank.

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

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Credit risk mitigants\* (continued)

## Methodologies for valuing collateral (continued)

In accordance with AIB Group's Property Valuation Policy and Guidelines, the Bank employs a number of methods to assist in reaching appropriate valuations for property collateral held. These include:

- a. External Valuation firms on the Group's Valuers Panel, are engaged by the Bank to undertake valuations of Immovable Property collateral in accordance with the rules set out in the Group Property Valuation Policy.
- b. Internal valuations are completed by first line of defence case managers pursuant to the rules in the Group Property Valuation Policy and in line with the Group Property Valuation Guidance, which provides appropriate valuation methodology guidance, including the Index valuation approach used for residential property.

### Collateral and ECLs

Applying one or a combination of the above methodologies, in line with AIB Group's Property Valuation Policy, has resulted in an appropriate range of discounts to original collateral valuations, influenced by the nature, status and year of purchase of the asset. The frequency and availability of such up-to-date valuations remain a key factor within ECLs determination. Additionally, relevant costs likely to be associated with the realisation of the collateral are taken into account in the cash flow forecasts. The spread of discounts is influenced by the type of collateral, e.g. buy-to-let, residential and also its location. The valuation arrived at is therefore, a function of the nature of the asset.

When undertaking an ECL review for individually assessed cases that have been deemed unlikely to pay, the present value of future cash flows, including the value of collateral held, and the likely time required to realise such collateral is estimated. An ECL allowance is raised for the difference between this present value and the carrying value of the loan.

## Summary of risk mitigants by selected portfolios

Set out below are details of risk mitigants used by the Bank in relation to financial assets detailed in the maximum exposure to credit risk table on page 31.

## Loans and advances to customers - residential mortgages

The following tables show the estimated fair value of collateral held for residential mortgages at 31 December 2022 and 2021:

					2022			
	Measured at amortised cost							
_	Stage 1	Stage 2	Stage 3	POCI	Total			
	€m	€m	€m	€m	€m			
Fully collateralised <sup>(1)</sup>								
Loan-to-value ratio:								
Less than 50%	9,310	404	143	12	9,869			
50% - 70%	5,331	179	52	3	5,565			
71% - 80%	1,364	17	11	_	1,392			
81% - 90%	897	8	1	_	906			
91% - 100%	72	1	1	_	74			
_	16,974	609	208	15	17,806			
Partially collateralised								
Collateral value relating to loans over 100% loan-to-value	17	5	5	_	27			
Total collateral value	16,991	614	213	15	17,833			
Gross residential mortgages	17,007	617	216	17	17,857			
ECL allowance	(25)	(19)	(65)	(2)	(111)			
Carrying value residential mortgages	16,982	598	151	15	17,746			

2022

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Credit risk mitigants\* (continued)

Loans and advances to customers - residential mortgages (continued)

					2021			
_	Measured at amortised cost							
_	Stage 1	Stage 2	Stage 3	POCI	Total			
	€m	€m	€m	€m	€m			
Fully collateralised <sup>(1)</sup>								
Loan-to-value ratio:								
Less than 50%	8,271	429	202	9	8,911			
50% - 70%	4,807	244	82	7	5,140			
71% - 80%	2,171	78	27	_	2,276			
81% - 90%	563	16	16	_	595			
91% - 100%	64	6	8	_	78			
	15,876	773	335	16	17,000			
Partially collateralised								
Collateral value relating to loans over 100% loan-to-value	26	8	12	_	46			
Total collateral value	15,902	781	347	16	17,046			
Gross residential mortgages	15,917	787	356	20	17,080			
ECL allowance	(17)	(18)	(102)	(7)	(144)			
Carrying value residential mortgages	15,900	769	254	13	16,936			

<sup>(1)</sup>The value of collateral held for residential mortgages which are fully collateralised has been capped at the carrying value of the loans outstanding at the financial year end.

For residential mortgages, the Bank takes collateral in support of lending transactions for the purchase of residential property. Collateral valuations are required at the time of origination of each residential mortgage. The value at 31 December 2022 and 2021 is estimated based on property values at origination or date of latest valuation and applying the CSO Residential Property Price Index to these values to take account of price movements in the interim.

## **Derivatives**

Derivative financial instruments are recognised in the statement of financial position at their fair value. Those with a positive fair value are reported as assets which at 31 December 2022 amounted to €742m (2021: €75m) and those with a negative fair value are reported as liabilities which at 31 December 2022 amounted to nil (2021: nil).

## Loans and advances to banks

Interbank placings, including central banks, are largely carried out on an unsecured basis apart from reverse repurchase agreements. However, there were no repurchase agreements outstanding at 31 December 2022 (2021: nil).

# Measurement, methodologies and judgements\*

The Bank has set out the methodologies used and judgements exercised in determining its ECL allowance for the year to 31 December 2022.

The Bank, in estimating its ECL allowance does so in line with the expected credit loss impairment model as set out by the International Financial Reporting Standard 9 Financial Instruments. This model requires a timely recognition of ECL across AIB Group. The standard does not prescribe specific approaches to be used in estimating ECL allowance, but stresses that the approach must reflect the following:

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

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

# Measurement, methodologies and judgements\* (continued)

## Introduction (continued)

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

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

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

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

### **Bases of measurement**

Under the standard, there are two bases of measurement:

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

#### Staging

Financial assets are allocated to stages dependent on credit quality relative to when assets were originated.

## Credit risk at origination

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

For undrawn credit facilities, the Bank uses the date of origination as the date when it becomes party to the irrevocably contractual arrangements or irrevocable commitment.

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

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

## Stage 1 characteristics

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

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

## Stage 2 characteristics

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

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

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

Measurement, methodologies and judgements\* (continued)

**SICR** assessment

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

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

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

The qualitative criteria for this trigger include, for example:

- A downgrade of the borrower's/facility's credit grade reflecting the increased credit management focus on these accounts; and/or
- Forbearance has been provided and the account is within the probationary period.

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

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

## Stage 3 characteristics

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

The key criteria resulting in a classification of default are:

- Where the Bank considers a borrower to be unlikely to pay their loans in full without realisation of collateral, regardless of the existence of any past-due amount; or
- The borrower is 90 days or more past due on any material loan (count starts when any amount of principal, interest or fee has not been paid by a borrower at the date it was due).

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

## Purchased or originated credit impaired ('POCI')

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

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

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Measurement, methodologies and judgements\* (continued)

## Measurement of expected credit loss

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

- i. Standard approach: This approach is used for the majority of exposures where each ECL input parameter (Probability of Default PD, Loss Given Default LGD, Exposure at Default EAD, and Prepayments PP) is developed in line with standard modelling methodology. The Bank's IFRS 9 models have been developed and approved through AIB's Model Risk Management Framework.
- ii. Simplified approach: For portfolios not on the standard approach, the Bank has followed a simplified approach. This approach consists of applying portfolio level ECL averages, drawn from similar portfolios, where it is not possible to estimate individual parameters. These generally relate to portfolios where specific IFRS 9 models have not been developed due to immateriality, low volumes or where there are no underlying grading models. As granular PDs are not available for these portfolios, a non-standard approach to staging is required with more reliance on the qualitative criteria (along with the 30 days past due back-stop).
- iii. Management judgement: Where the estimate of ECL does not adequately capture all available forward looking information about the range of possible outcomes or where there is a significant degree of uncertainty, management judgement may be considered appropriate for an adjustment to ECL. The management adjustment must consider all relevant and supportable information, including but not limited to, historical data analysis, predictive modelling and management experience. The methodology to incorporate the adjustment should consider the degree of any relevant over collateralization (headroom) and should not result in a zero overall ECL unless there is sufficient headroom to support this. The key judgements in the 2022 year end ECL estimates are outlined on page 29 and 30.

### Effective interest rate

The ECL must incorporate the time value of money discounted to the reporting date using the EIR determined at initial recognition or an approximation thereof:

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

## Policy elections and simplifications

## Low credit risk exemption

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

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

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

This low credit risk exemption is applied to loans and advances to banks, specifically, assets which have an internal grade equivalent to an external investment grade (BBB-) or higher.

If an asset does not meet the above criteria for the low credit risk exemption, further assessment is required to determine stage allocation. If such assets are on a watch list, they are allocated to as Stage 2.

## IFRS 9 ECL Credit risk models

## Probability of default ('PD')

PD is the likelihood that an account or borrower defaults over an observation period, given that they are not currently in default. The PD modelling approach uses a combination of rating grades/scores obtained from credit risk models, as outlined on page 33, along with key factors such as the current/recent arrears status or the current/recent forbearance status and macroeconomic factors to obtain the relevant 12 month (Stage 1) and Lifetime (Stage 2) PD.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Measurement, methodologies and judgements\* (continued)

## Loss given default ('LGD')

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

The LGD modelling approach depends on whether the facility has underlying security and, if so, the nature of that security.

The value of underlying collateral is estimated at the forecasted time of disposal (taking into account forecasted market price growth/falls and haircuts on market values that are expected at the date of sale) in order to calculate the future recovery amount. Estimated costs of disposal are taken into account in this calculation.

## **Exposure at default ('EAD')**

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

### **Prepayments**

For term credit products, prepayment occurs where a customer fully prepays an account prior to the end of its contractual term.

Prepayment is used in the lifetime ECL calculation for Stage 2 loans to account for the proportion of the facilities/customers that prepay each year.

## Determining the period over which to measure ECL

Both the origination date and the expected maturity of a facility must be determined for ECL purposes. The origination date is used to measure credit risk at origination (as explained above).

The expected maturity is used for assets in Stage 2, where the ECL must be estimated over the remaining life of the facility.

## The expected maturity approach is:

 Term credit products: the contractual maturity date, with exposure and survival probability adjusted to reflect behaviour i.e. amortisation and pre-payment.

## Forward looking indicators in models

For ECL calculations reliant on models in the standard and simplified approaches, forward looking indicators are incorporated into the models through the use of macroeconomic variables. These have been identified statistically as the key macroeconomic variables that drive the parameter being assessed (e.g. PD or LGD). The final model structure incorporates these as inputs with the 12 month and lifetime calculations utilising the macroeconomic forecasts for each scenario. See 'macroeconomic scenarios and weightings' below for more detail on the process for generating scenarios and associated key macroeconomic factors relevant for the models. In circumstances where there is a risk that the modelled output fails to capture the appropriate response to changes in the macroeconomic environment such as inflation and interest rate changes, these risks are captured through the use of post model adjustments.

## Write-offs

When the prospects of recovering a loan, either partially or fully, do not improve, a point may come when it will be concluded that as there is no realistic prospect of recovery, the loan and any related ECL will be written-off. The Bank determines, based on specific criteria, the point at which, there is no reasonable expectation of recovery. When the following criteria exist, the loan can be subject to a partial or full write-off:

- A decision has been taken to enforce on a loan, due to no agreement with the customer for a restructure / settlement, all customer engagement with the Bank regarding their loan agreement has ceased.
- Inception of formal insolvency proceedings or receivership/other formal recovery action.
- Receivership or other formal recovery action (e.g. where expectation of recovery of collateral is expected through enforcement activity but no additional recoveries above the collateral value are anticipated) has commenced or is about to commence; and
- A loan is substantially provided for or no material repayments have been received for a period of time (minimum 12 months) and all customer engagement with the Bank regarding their loan agreement has ceased.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

# Measurement, methodologies and judgements\* (continued)

## Write-offs (continued)

Debt forgiveness may subsequently arise where there is a formal contract with the customer for the write-off of the loan. In addition, certain forbearance solutions and restructuring agreements may include an element of debt write down (debt forgiveness). Refer to page 39 for details of forbearance.

The contractual amount outstanding of loans written off during the year that are still subject to enforcement activity are outlined on page 38 and relate to non-contracted write-offs, both full and partial. The Bank recognises cash received from the customer in excess of the carrying value of the loan after a non-contracted write-off as 'recoveries of amounts previously written-off' in the income statement.

## Macroeconomic scenarios and weightings

The macroeconomic scenarios used by the Bank for the ECL calculation have been subject to the Bank's established governance process covering the development and approval of macroeconomic scenarios used for planning and internal stress testing purposes. The macroeconomic scenarios and attached probabilities are reviewed by the Asset and Liability Committee ('ALCo') regularly, and such reviews took place frequently during 2022 in response to economic developments. The scenarios are reviewed and approved by the AIB Board and also approved by the AIB Mortgage Bank's Board. The scenario probabilities are approved by the AIB Board Audit Committee ('BAC') and also by AIB Mortgage Bank Audit Committee. The parameters used within the Bank's ECL models include macroeconomic factors which have been established as drivers of the default risk and loss estimates. Therefore, a different credit loss estimate is produced for each scenario based on a combination of these identified macroeconomic factors. The credit loss estimates for each scenario are then weighted by the assessed likelihood of occurrence of the respective scenarios to yield the ECL outcome.

### Macroeconomic scenarios:

Following the Russian invasion of Ukraine in February 2022, global energy and food commodity prices surged. This intensified pre-existing inflationary pressures caused by supply bottlenecks in many economies as they recovered following the lifting of Covid restrictions. Against this background, the greatest risk to the outlook is for persistently elevated inflation coupled with higher interest rates which depress economic activity. A range of possible scenarios has been considered in formulating the ECL calculation, as at the financial reporting date. These entail credible risks and uncertainties to the economic outlook including inter alia possible energy supply rationing, a deterioration in financial conditions, renewed short waves of COVID-19 infections, as well as a prolonged period of elevated inflation – all possible triggers of a future economic downturn.

AlB have used four scenarios in the ECL calculation consisting of a base scenario, along with three alternative scenarios. These consist of one upside; a mild downside scenario entailing disruptions to energy supplies and a re-emergence of the Covid virus; while a more severe downside considers a cut-off of Russian gas supplies to Europe with persistently high inflation which necessitates a hike in official interest rates. Non-linear effects are captured in the development of risk parameters as well as through the inclusion of both the single upside and two downside scenarios.

AlB Group's Economic Research Unit ('ERU') provide the scenario forecasts over five years. These are then independently reviewed and challenged, on both a quantitative and qualitative basis, by the Bank's Risk function. The base case is benchmarked against the outlook available from official sources (e.g. Central Bank of Ireland, Department of Finance, ESRI, etc.) to ensure it is appropriate.

Upside and downside scenarios, relative to the base case, are provided to ensure a reasonable range of possible outcomes is available for the IFRS 9 process. These scenarios are benchmarked to alternative scenarios from official sources, where possible. The longer term economic projections (beyond five years) are sourced from a reputable external provider with the internal scenarios converging on a linear basis towards the external forecasts from years 5 to 8. External long term forecasts represent long term base line forecasts for the parameter/economy in question. The forecasted scenarios are kept under review by the Bank's ALCo and approved by the AIB Board.

The scenarios used for the year-end ECL process are described below and reflect the views of the Bank as at the reporting date.

**Base case:** A combination of a very sharp acceleration in inflation, partly owing to the war in Ukraine, and marked tightening of monetary policy and financial conditions resulted in a pronounced slowdown in global growth during 2022, which is expected to extend well into 2023. The economic backdrop has become far more challenging as the global economy moves into a period of weak growth, elevated inflation and rising interest rates. As a result, global growth forecasts for 2022-23 have been scaled back significantly from earlier in the year.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Measurement, methodologies and judgements\* (continued)

Macroeconomic scenarios and weightings (continued)

AIB forecasts Irish GDP growth to slow to 4% in 2023, which is somewhat below most official forecasts reflecting our higher inflation projection. A moderate pick-up in global growth from 2024 onwards is expected as real household incomes are boosted by falling inflation and some of the tightening in monetary conditions in 2022-23 is reversed. Growth accelerates to 1.5% in the Eurozone and 1.5-2.0% in the US from 2024, but recovery is delayed in a weakened UK economy until 2025. The Irish economy is expected to grow by close to 4% in 2024 and 2025, respectively.

Unemployment has fallen to very low levels in nearly all economies. It is expected to rise only moderately in 2023-25, as most labour markets are characterised by a shortage of workers and high job vacancies. Inflation has hit 40-year highs. Commodity prices started to fall back since summer 2022, which combined with weakening activity and positive base effects, should see the UK inflation rates fall back to circa 2% by early 2025. Continuing high gas prices in 2023, though, would pose a serious risk to this inflation outlook.

Interest rates are expected to continue to be hiked aggressively into 2023 in the Euro zone, and are likely to average circa 3.5% over the period 2023 to 2027. House price inflation is expected to decelerate sharply in Ireland to 2.5% per annum over the 2023-2027 period. CRE prices are projected to fall sharply in Ireland during 2023 though valuations should begin to recover from mid-2024 onwards.

**Downside 1 ('Lower growth in 2023'):** In the AIB Moderate Downside scenario, risks to growth prove to have a more negative impact on activity than provided for in the base case. In particular, the war in Ukraine has a more significant impact on growth than expected, with ongoing disruptions of gas supplies to Europe from Russia. There are continuing short waves of COVID-19 infections necessitating some restrictions on activity, most notably in China.

As a result, the major economies all experience a significant recession in 2023, and while Irish GDP growth slows sharply, it still expands by 2.5% in 2023 and 2024. GDP is more than 3% lower by 2025, across most economies, compared to the Base scenario. There is a marked rise in unemployment everywhere, climbing to circa 7.5% in Ireland.

There are significant falls in property prices. House prices in Ireland decline by more than 9% in cumulative terms (end-year basis) over the period 2023-2024 and an even bigger cumulative fall in CRE prices of circa 16.5%.

Interest rates peak at the end of 2022, with central banks implementing rate cuts in 2023-24 on the view that leaving policy unchanged would see inflation fall below 2% by end 2024. Rates are cut to 0.5% in the Euro Area. Irish inflation averages 2% from 2025 onwards.

**Downside 2** ('Energy shock and persistently high inflation'): The war in Ukraine is assumed to have a much more severe impact on global economic activity than anticipated by forecasters. Inflation stays very high in 2023-2024 with ongoing interruptions in European gas imports from Russia, continuing disruptions to global supply chains, greater second round price effects and wage inflation picking up. Central banks are forced into a very sharp tightening of monetary policy. Conditions in financial markets tighten further, with a surge in bond yields, blow out in credit spreads and more sharp falls on stock markets. Emerging markets come under severe pressure in particular.

The combination of energy and financial market shocks as well as the very sharp tightening of monetary policy triggers a severe global recession in 2023-24. The main economies see GDP decline by circa 2% in 2023 and 2.0% - 2.5% in 2024. Irish GDP growth slows to 1% and 1.5% in 2023 and 2024, respectively, and is 6.3% lower by 2025 than in Base scenario. There is a moderate pick up in global activity from 2025.

Jobless rates rise to very high levels in the main economies. Irish unemployment rises sharply to 10% by end 2025 and remains high in 2026-2027.

Given that the main advanced economies enter a deep recession in 2023-24, property price experience a significant decline in Ireland of circa 22% in cumulative terms over the period 2023 to 2024 with a further (modest 1%) decline in 2025. By 2025, house prices are expected to be 28% lower versus the Base scenario by 2025. CRE prices in Ireland fall by an assumed 35% in cumulative terms over the period 2023-25.

Central banks raise rates, and in the Euro Area, the main refinancing rate averages 3.8% in 2024. Inflation falls back in the second half of 2024 allowing central banks to lower rates aggressively. Rates do not return to previous lows as inflation reverts towards its 2% target in 2025-26. Thus, central banks ease rates gradually with the main refinancing rate averaging 1% in 2026 and 2027 in the Euro zone, some 250 basis points below the level assumed in the Base scenario.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

Measurement, methodologies and judgements\* (continued) Macroeconomic scenarios and weightings (continued)

**Upside** ('Quick economic recovery'): In the upside scenario, the key assumptions consist of a combination of a relatively quick cessation of hostilities in Ukraine by the end of winter (in early 2023) coupled with an accelerated deployment of vaccines globally brings about a quicker than expected suppression of the coronavirus. In addition, a strong rebound in business and consumer confidence facilitates a rundown of personal and corporate savings. The confluence of these developments helps boost global growth.

In this scenario, GDP is some 3.2% higher in most economies than in the base case by 2025. Irish GDP growth averages 5% over the period 2023-2025. World GDP growth then decelerates to trend over 2026-27. As a result, unemployment falls further in all economies. With stronger economies, inflation goes even higher and is slower to decline than in the base case, only getting back to 2% at end 2026.

With the stronger growth in economic activity, Irish property prices perform much better than in the base case scenario with house price rise by an average of 4.5% per annum over the period 2023 to 2025 while commercial property prices rise circa 3% per annum over the same period.

Central banks hike rates at a quicker pace than in the Base scenario. Rates rise to an annual average of 3.75% in the Euro zone from 2024 onwards.

The table below sets out the five year forecast for each of the key macroeconomic variables that are required to generate the scenarios or are material drivers of the ECL under (i) Base, (ii) Downside 1, (iii) Downside 2 and (iv) Upside scenarios at 31 December 2022 (average over 2023 - 2027) and at 31 December 2021 (average over 2022-2026).

		5 year (202	Dece 3-2027) avera	ember 2022 ge forecast		5 year (202	Dece 22-2026) avera	mber 2021 ge forecast
Macroeconomic factor (%)	Base	1 ('Lower growth in	Downside 2 ('Energy shock and persistently high inflation')	Upside ('Quick economic recovery')	Base	Downside 1 ('Lower growth in 2022')	Downside 2 ('Persistent high inflation')	Upside ('Quick economic recovery')
Republic of Ireland								
GDP growth	3.6	3.4	2.6	4.3	3.8	3.4	2.6	4.5
Residential property price growth	2.5	0.2	(4.3)	3.8	2.9	1.4	(2.1)	5.0
Unemployment rate	5.0	6.8	8.5	3.9	5.7	9.7	11.9	4.8
Employment growth	1.6	1.1	0.2	1.9	2.6	2.0	1.4	2.9
Average disposable Income growth	5.1	4.3	3.4	6.0	3.5	2.6	1.8	3.8
Inflation	2.7	2.7	3.9	3.5	1.7	1.3	2.4	2.2

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

Measurement, methodologies and judgements\* (continued) Macroeconomic scenarios and weightings (continued)

Additional information is provided in the table below which details the individual macroeconomic factor forecast for each year across the four scenarios, as at 31 December 2022.

	Estimate	Base					Downside ('Lower growth in 2023				
Macroeconomic factor	<b>2022</b> %	<b>2023</b> %	2024 %	2025 %	<b>2026</b> %	<b>2027</b> %	<b>2023</b> %	<b>2024</b> %	2025 %	2026 %	2027 %
Republic of Ireland											
GDP growth	8.0	4.0	3.7	4.0	3.5	3.0	2.5	2.5	3.5	4.0	4.5
Residential property price growth	5.0	2.5	2.5	2.5	2.5	2.5	(7.0)	(2.5)	5.0	3.0	2.5
Unemployment rate	4.6	4.8	5.0	5.0	5.0	5.0	5.6	6.8	7.4	7.5	7.0
Employment growth	6.0	1.5	1.5	1.7	1.6	1.5	0.6	0.4	0.9	1.4	2.0
Average disposable income growth	3.5	6.5	5.3	4.7	4.6	4.5	5.0	4.0	4.0	4.0	4.5
Inflation	8.3	5.2	2.5	2.0	2.0	2.0	5.2	2.5	2.0	2.0	2.0

	Downside 2 ('Persistent high inflation')					(	'Quick	econon	Up nic reco	side 1 overy')
Macroeconomic factor	2023 %	<b>2024</b> %	2025 %	<b>2026</b> %	<b>2027</b> %	2023 %	2024 %	2025 %	2026 %	2027 %
Republic of Ireland										
GDP growth	1.0	1.5	2.5	3.5	4.5	5.5	4.5	5.0	3.7	3.0
Residential property price growth	(8.0)	(15.0)	(1.0)	1.0	1.5	5.0	4.5	4.0	3.0	2.5
Unemployment rate	6.0	7.8	9.3	10.0	9.5	4.3	4.1	3.8	3.6	3.6
Employment growth	(0.1)	(0.9)	(0.6)	0.6	2.0	2.3	2.1	2.0	1.7	1.5
Average disposable Income growth	4.0	3.0	3.0	3.0	3.8	8.0	6.5	5.5	5.2	5.0
Inflation	8.0	5.0	2.5	2.0	2.0	6.0	4.0	3.0	2.5	2.0

The key changes to the scenario forecasts in the reporting period have been driven by the outbreak of war in Ukraine, following the Russian invasion, in addition to mounting inflationary pressures and monetary policy tightening by global central banks. The wider economic impact of the war in Ukraine has generated elevated uncertainty with respect to the economic outlook largely due to concerns over energy security and a surge in pre-existing inflationary pressures largely driven by much higher commodity prices (in particular gas and raw foodstuffs). These developments have resulted in a significant re-assessment of the outlook and balance of risks during 2022.

The four scenarios detailed above are used to reflect a representative sample of possible outcomes. The ECL allowance reflects a weighted average of the credit loss estimates under the four scenarios.

Similar to the scenario forecasts, the probability weight assigned to each scenario is proposed by the Group's ERU. These are reviewed and approved by the Parent Group's governance processes, and by the AIB Mortgage Bank Audit Committee. The probabilities described below reflect the views of AIB Mortgage Bank at the reporting date.

The weights for the scenarios are derived based on expert judgement, with reference to external market information where possible. Given the unprecedented nature and impact of COVID-19 ('cliff edge' effect on economic activity), the standard quantitative approaches, such as statistical distribution analysis of Irish GDP growth over different time horizons informed by historic patterns in the economic data, used to assess scenario likelihoods are less useful than normal in this environment. As a result, they have not been a key driver in determining the selection of weightings at the reporting date.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

Measurement, methodologies and judgements\* (continued)

Macroeconomic scenarios and weightings (continued)

These weightings are reviewed regularly by AIB ALCo and adjusted where required. The key drivers of the weightings at the reporting date are:

- The Base scenario assumptions were benchmarked to be on the conservative side of consensus projections on the basis that it would be prudent to adopt such a bias in light of the weak global backdrop and downside risks facing the macroeconomic outlook.
- Forecasts released in the closing months of 2022 from the IMF, OECD, ECB, ESRI, Central Bank of Ireland and the Department of Finance were close to the AIB projections. The AIB forecasts remain on the conservative side of most recent external benchmarks, especially in relation to Ireland. Most releases of Irish economic data, have been trending stronger than our forecasts. This includes variables such as GDP, Modified Final Domestic Demand, unemployment and house prices.
- The balance of risks to the forecasts is still heavily skewed to the downside with revisions to consensus forecasts for growth in 2023-2024 trending firmly downwards. Forecasters also highlight that the balance of risks to their latest projections remain tilted to the downside, with real concerns that the world economy could be hit by recession in 2023 the AIB moderate downside and severe scenarios entail significant recessions in the major economies.
- The sharp rise in inflation during 2022 has been a concern as is the risk that inflation will prove slow to fall back, which would pose a downside risk to growth prospects in 2023-24 in terms of an ongoing hit to real disposable incomes and consumer spending. The war in Ukraine has added to downside risks, especially in relation to the flow of European gas supplies in 2023-24.
- There is also a risk to global growth from monetary tightening, whereby in their efforts to dampen inflation, central banks hike rates to the extent that it tips economies into recession. Rates were hiked aggressively in the second half of 2022. The political turmoil following the September 2022 'mini-budget' led to higher interest rates, generating uncertainty and economic fragility against a background of subdued growth and elevated inflation, ultimately necessitating an almost complete reversal of the budgetary measures.

The weights that have been applied as at the reporting date are:

Scenario	Weighting 31 December 2022		Weighting 31 December 2021
Base	45%	Base	50 %
Downside ('Lower growth in 2023')	30%	Downside ('Lower growth in 2022')	25 %
Downside ('Energy shock and persistently high inflation')	15%	Downside ('Persistent high inflation')	5 %
Upside ('Quick economic recovery')	10%	Upside ('Quick economic recovery')	20 %

In assessing the adequacy of the ECL allowance, the Bank has considered all available forward-looking information as of the balance sheet date in order to estimate the future expected credit losses. The Bank, through its risk management processes (including the use of expert credit judgement and other techniques) assesses its ECL allowance for events that cannot be captured by the statistical models it uses and for other risks and uncertainties. The assessment of ECL at the balance sheet date does not reflect the worst case outcome, but rather a probability-weighted outcome of the four scenarios. Should the credit environment deteriorate beyond the Bank's expectation, the Bank's estimate of ECL would increase accordingly.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

# Measurement, methodologies and judgements\* (continued) Sensitivities

The Bank's estimates of expected credit losses are responsive to varying economic conditions and forward looking information. These estimates are driven by the relationship between historic experienced loss and the combination of macroeconomic variables. Given the co-relationship of each of the macroeconomic variables to one another and the fact that loss estimates do not follow a linear path, a sensitivity to any single economic variable is not meaningful. As such, the following sensitivities are provided which indicate the approximate impact on the current ECL allowance before the application of probability weights to the forward looking macroeconomic scenarios. The sensitivities provide an indication of ECL movements that include changes in model parameters, quantitative 'significant increase in credit risk' ('SICR') staging assignments with post model adjustments sensitivity predominantly reflected only where scenario specific features form an integral part of the adjustment. Further details on post model adjustments are outlined on pages 29 to 30.

Relative to the base scenario, in the 100% downside 'Lower growth in 2023' and 'Energy shock and persistently high inflation' scenario, the ECL allowance increases by 3% and 17% respectively. In the 100% upside scenario, the ECL allowance declines by 2%, showing that the ECL impact of the two downside scenarios is greater than that of the upside scenario. For 31 December 2022, a 100% downside 'Lower growth in 2023' and 'Energy shock and persistently high inflation' scenarios sees a higher ECL allowance sensitivity of €3m and €19m respectively compared to base (€1m and €17m respectively compared to reported). This compares to an ECL allowance sensitivity of €8m and €31m respectively compared to base, (€5m and €28m reported) for the downside 1 and 2 scenarios in place for 31 December 2021.

	ECL allowance at 31 Decembe								
	Reported	100% Base	100% Downside 1 ('Lower growth in 2023')	100% Downside 2 ('Energy shock and persistently high inflation')	100% Upside ('Quick economic recovery')				
	Total	Total	Total	Total	Total				
Loans and advances to customers	€m	€m	€m	€m	€m				
Residential mortgages	111	109	112	128	107				
Total	111	109	112	128	107				
Off-balance sheet loan commitments	_	_	_	_	_				
	111	109	112	128	107				

		ECL allowance at 31 December 2021								
	Reported	100% Base	e 100% Downside 100% Downside 100% Upsic 1 ('Lower growth 2 ('Persistent ('Quic economy and part of the property of the proper							
	Total	Total								
Loans and advances to customers	€m	€m	€m	€m	€m					
Residential mortgages	144	141	149	172	139					
Total	144	141	149	172	139					
Off-balance sheet loan commitments	_	_	_	_	<u> </u>					
	144	141	149	172	139					

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

# Measurement, methodologies and judgements\* (continued)

## **Management judgements**

Post model adjustments (PMAs) are applied where management believe that they are necessary to ensure an adequate level of overall ECL provision and to address known model limitations and/or emerging trends not captured in the models. All PMAs are approved under the ECL governance process through which the appropriateness of post model adjustments are considered against the backdrop of the risk profile of the loan book, recent loss history or changes in underlying resolution strategies not captured in the models and management's view of emerging trends.

The PMAs approved for 31 December 2022 (and 2021 comparison, where applicable), are set out below and categorised as follows:

- NPE resolution ECL adjustments where the current model does not take into account alternative strategies such as portfolio sales.
- Emerging headwinds ECL adjustments required where the modelled outcomes are not sensitive to the uncertainties
  associated with the impact of current emerging economic headwinds.
- Macroeconomic factors ECL adjustments reflecting the changed impact / timing of certain macroeconomic factors.

	2022
	Residential mortgages
Management judgements	€m
NPE resolution	46
Emerging headwinds	31
Macroeconomic factors	8
PMA total	85
	2021
	Residential mortgages
Management judgements	€m
NPE resolution	81
Uncertainty due to the impact of COVID-19	9
Macroeconomic factors	13
PMA total	103

## **NPE** resolution

At 31 December 2022, this PMA relates to mortgages which have been classified as non-performing for a considerable length of time and has been retained to reflect expected outcomes from alternative strategies which may be adopted, such as portfolio sales. LGD models are based on empirical internal data assuming business as usual resolution and given that the models do not account for alternative strategies, post model adjustments have been applied to reflect the potential outcomes, pending model redevelopment.

The completion of a non-performing portfolio sale in the year has resulted in a reduction in the ECL PMA stock which has reduced from €81 million at 31 December 2021 to €46 million at 31 December 2022.

## **Emerging headwinds**

Particular focus from management was on assessing the combined effects of cost of living challenges, persistent inflationary pressures and rising interest rates on customer's ability to repay. The ultimate impact of these effects is highly uncertain, however should they lead to a reduction in customer's ability to meet their loan repayment obligations, there could be an increase in credit risk which could have a negative impact on the asset quality of the mortgage portfolio.

A PMA of €31 million has been introduced to reflect the increased probability of default due to rising interest rates and increased cost of living. This PMA has been applied within the performing portion of the residential mortgage portfolio, The 2021 PMA relating to COVID-19 (€9m) has been fully released.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

Measurement, methodologies and judgements\* (continued)

Management judgements (continued)

**Macroeconomic factors** 

An ECL adjustment continues to be applied to reflect limitations within the mortgage model relating to the house price index (HPI) growth. This is to ensure that the ECL remains appropriate for the underlying portfolio acknowledging the limitations within the model.

The HPI index parameter, which assumes growth over the long term, has reduced the LGD thereby impacting ECL cover on Stage 1, Stage 2 and Stage 3 loans (not covered by the NPE resolution strategy adjustment above). An adjustment has been made to reflect the Group's potential alternative recovery strategies for the impacted loans that are or could become credit impaired. This adjustment amounted to €8 million (Stage 1: €2 million, Stage 2: €2 million and Stage 3: €4 million). The reduction in the year reflects the release of the PMA associated with the employment growth rate parameter within the model which experienced a temporary spike due to COVID-19 in 2021. This parameter is now accurately reflected in the modelled outcome.

## **ECL** governance

The Board of AIB Group has put in place a framework, incorporating the governance and delegation structures commensurate with a material risk, to ensure credit risk is appropriately managed throughout AIB Group.

The key governance points in the ECL approval process during 2022 were:

- Model Risk Committee;
- Asset and Liability Committee:
- Business level ECL Committees:
- Group Credit Committee; and
- Board Audit Committee.

For ECL governance, the Bank's management employs its expert judgement on the adequacy of ECL. The judgements are supported by detailed information on the portfolios of credit risk exposures, and by the outputs of the measurement and classification approaches described above, coupled with internal and external data provided on both short term and long-term economic outlook. Business segments and Bank management are required to ensure that there are appropriate levels of cover for all of its credit portfolios and must take account of both accounting and regulatory compliance when assessing the expected levels of loss.

Assessment of the credit quality of each business segment and subsidiaries is initially informed by the output of the quantitative analytical models but may be subject to management adjustments. This ECL output is then subject to approval at individual business unit level (ECL Committee), which also includes subsidiaries, prior to onward submission to the GCC. GCC reviews and challenges ECL levels prior to recommendation to the Board Audit Committee as the final approval authority.

In addition, the Bank's ECL levels are also subject to review by the Bank's Audit Committee and Board prior to final approval by AIB Group's Board Audit Committee.

## Credit risk management consideration of ESG risks

The Bank continues to adapt its credit risk management processes and policies to capture environmental, social, and governance ('ESG') risks. Throughout 2022, the Bank has remained focused in embedding the following key initiatives:

- The property valuation process continues to obtain BER/EPC ratings where applicable, which are captured in collateral valuations and recorded on AIB Group's systems.
- A Sustainable Lending Framework was introduced in 2021 and continues to categorise and identify relevant lending activities as green/transition for internal tracking and external disclosure purposes.

## Credit exposure overview

## Maximum exposure to credit risk\*

Maximum exposure to credit risk from on-balance sheet and off-balance sheet financial instruments is presented before taking account of any collateral held or other credit enhancements (unless such enhancements meet accounting offsetting requirements). For financial assets recognised on the statement of financial position, the maximum exposure to credit risk is their carrying amount, and for financial guarantees and similar contracts granted, it is the maximum amount the Bank would have to pay if the guarantees were called upon. For loan commitments and other credit related commitments that are irrevocable over the life of the respective facilities, it is generally the full amount of the committed facilities.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk

## Credit exposure overview (continued)

Maximum exposure to credit risk\* (continued)

The following table sets out the maximum exposure to credit risk that arises within the Bank and distinguishes between those assets that are carried in the statement of financial position at amortised cost and those carried at fair value at 31 December 2022 and 2021:

			2022			2021
	Amortised Cost <sup>(1)</sup>	Fair Value <sup>(2)</sup>	Total	Amortised Cost <sup>(1)</sup>	Fair Value <sup>(2)</sup>	Total
	€m	€m	€m	€m	€m	€m
Derivative financial instruments	_	742	742	_	75	75
Loans and advances to banks	50	_	50	83	_	83
Loans and advances to customers	17,746	_	17,746	16,936	_	16,936
Included elsewhere:						
Other assets	_	_	_	15	_	15
	17,796	742	18,538	17,034	75	17,109
Off balance sheet loan commitments <sup>(3)</sup>	707	_	707	843	_	843
Maximum exposure to credit risk	18,503	742	19,245	17,877	75	17,952

<sup>&</sup>lt;sup>(1)</sup>All amortised cost items are loans and advances which are in a 'held-to-collect' business model.

Credit risk exposure derives from standard on-balance sheet products such as mortgages. In addition, credit risk arises from other products and activities including "off-balance sheet" commitments.

The following table summarises financial instruments in the statement of financial position at 31 December 2022 and 2021:

				2022*				2021*
	Statement of financial position			Income statement	Stateme	Income statement		
	Exposure	ECL allowance	Carrying amount	Net credit impairment writeback	Exposure	ECL allowance	Carrying amount	Net credit impairment writeback
	€m	€m	€m	€m	€m	€m	€m	€m
Loans and advances to banks	50	_	50	_	83	_	83	_
Loans and advances to customers	17,857	(111)	17,746	3	17,080	(144)	16,936	30
Loan commitments	707	_	707		843	_	843	
Total				3				30

There was a €3m net credit impairment writeback in the year to 31 December 2022 (2021: net credit impairment writeback of €30m). This comprised of a €5m charge on loans and advances to customers (2021: writeback of €16m) offset by recoveries of amounts previously written-off of €8m (2021: €14m) and a nil charge for off-balance sheet exposures.

Further details on the net credit impairment writeback in the year to 31 December 2022 are set out on page 87.

<sup>&</sup>lt;sup>(2)</sup>All items measured at fair value. The Bank does not hold investment securities at FVOCI nor hedging derivatives classified as 'fair value through profit or loss'.

<sup>(3)</sup>A commitment is an off-balance sheet product, where there is an agreement to provide an undrawn credit facility. The contract may or may not be cancelled unconditionally at any time without notice depending on the terms of the contract.

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk - Credit profile of the loan portfolio

The following table analyses the loan portfolio by ECL staging at 31 December 2022 and 2021:

Amortised cost			2022			2021
- -	Owner occupier	Buy-to-let	Total	Owner occupier	Buy-to-let	Total
Gross loans and advances to customers	€m	€m	€m	€m	€m	€m
Total gross carrying amount	16,688	1,169	17,857	15,641	1,439	17,080
Analysed as to ECL staging						
Stage 1	15,975	1,032	17,007	14,725	1,192	15,917
Stage 2	528	89	617	639	148	787
Stage 3	170	46	216	260	96	356
POCI	15	2	17	17	3	20
Total	16,688	1,169	17,857	15,641	1,439	17,080
ECL allowance - statement of finar	ncial position					
Stage 1	(25)	_	(25)	(15)	(2)	(17)
Stage 2	(18)	(1)	(19)	(14)	(4)	(18)
Stage 3	(52)	(13)	(65)	(65)	(37)	(102)
POCI	(2)	_	(2)	(6)	(1)	(7)
Total	(97)	(14)	(111)	(100)	(44)	(144)
Carrying amount loans and advances	16,591	1,155	17,746	15,541	1,395	16,936
ECL allowance cover percentage	%	%	%	%	%	%
Stage 1	0.2	_	0.1	0.1	0.1	0.1
Stage 2	3.3	1.5	3.1	2.2	2.9	2.3
Stage 3	30.7	28.4	30.2	24.9	38.7	28.6
POCI	10.4	26.8	12.2	32.2	45.7	33.9
Income statement	€m	€m	€m	€m	€m	€m
Net remeasurement of ECL allowance	20	(15)	(5)	(8)	(8)	(16)
Recoveries of amounts previously written-off	(5)	(3)	8	(8)	(6)	(14)
Net credit impairment (writeback)/charge	14	(18)	(3)	(16)	(14)	(30)
	%	%	%	%	%	%
Net credit impairment (writeback)/charge on average loans	0.09	(1.36)		(0.11)	(0.84)	(0.18)

## Gross loans and advances to customers

Gross loans and advances to customers increased by €777m in the year to 31 December 2022. This increase was driven by new lending activity €2,876m (€1,994m in 2021), partially offset by redemptions net of interest credited €2,011m, non performing mortgage portfolio loan sale €96m and other positive movements of €8m.

Stage 3 loans decreased by €140m to €216m. The Stage 3 reduction was primarily as a result of disposals of €87m following the sale of a non-performing mortgage portfolio completed in the year. In addition, repayments net of interest credited and write-offs accounted for €56m and €1m respectively. These reductions were offset by net flow to Stage 3 of €4m.



## 3.1 Credit risk

## Credit profile of the loan portfolio (continued)

## **ECL** allowance

The ECL allowance on loans and advances to customers reduced by €33m to €111m in the 12 months to 31 December 2022. The reduction was predominately due the sale of non-performing mortgage portfolio and other balance sheet ECL reductions, partially offset by net on balance sheet ECL P&L charge which includes impact of macroeconomic scenario and probability weight updates and post model adjustments. The ECL cover rate has reduced from 0.8% at 31 December 2021 to 0.6% at 31 December 2022. The reduction in the Buy to let ECL cover rate was due to the impact of mortgage portfolio loan sale.

## Internal credit grade profile by ECL staging

The table below analyses the internal credit grading profile by ECL staging for loans and advances to customers at 31 December 2022 and 2021:

Amortised cost					2022*
	Stage 1	Stage 2	Stage 3	POCI	Total
	€m	€m	€m	€m	€m
Strong	13,288	164	-		13,452
Satisfactory	3,538	88	-	2	3,628
Total strong/satisfactory	16,826	252		2	17,080
Criticised watch	179	248		0	427
Criticised recovery	2	117	_	11	130
Total criticised	181	365	_	11	557
Non performing		_	216	4	220
Gross carrying amount	17,007	617	216	17	17,857
ECL allowance	(25)	(19)	(65)	(2)	(111)
Carrying amount	16,982	598	151	15	17,746

Amortised cost					2021*
	Stage 1	Stage 2	Stage 3	POCI	Total
	€m	€m	€m	€m	€m
Strong	12,572	242	_	_	12,814
Satisfactory	3,143	108	_][	3	3,254
Total strong/satisfactory	15,715	350	_	3	16,068
Criticised watch	199	255	_	1	455
Criticised recovery	3	182		5	190
Total criticised	202	437	_	6	645
Non performing	_	_	356	11	367
Gross carrying amount	15,917	787	356	20	17,080
ECL allowance	(17)	(18)	(102)	(7)	(144)
Carrying amount	15,900	769	254	13	16,936

Of the total loans to customers of €17,857m, €17,080m or 96% are rated as either 'strong' or 'satisfactory' which is an increase of €1,012m (2021: €16,068m). The 'criticised' classification includes 'criticised watch' of €427m and 'criticised recovery' of €130m, the total of which has decreased by €88m. The increase in loans classified as Strong and decreased in volume of Criticised watch is primarily driven by new lending and improved credit quality. Overall, the total performing book has increased by €924m to €17,637m of gross loans and advances to customers (2021: €16,713m).

<sup>\*</sup>Forms an integral part of the audited financial statements



## 3.1 Credit risk - Credit profile of the loan portfolio

## **Non-performing loans**

Non-performing loans are aligned to the Bank's definition of default and Stage 3 credit impaired with the exception of those in POCI (€4m). Non-performing loans have reduced by €147m to €220m or 1.2% of loans and advances to customers (2021: €367m and 2.1%). This reduction reflects mortgage portfolio loan sale €86m, net repayments €59m, and net flow from non-performing loans of €2m during the year.

The table below sets out the Bank's non-performing loans and advances to customers by asset class and by time in default at 31 December 2022:

	2022	2021
Non-performing loans	€m	€m
At amortised cost	220	367
At FVTPL	_	_
Total non-performing loans and advances to customers	220	367
Non-performing loans as a % of total loans and advances to customers	1.2 %	2.1 %
	_	_
ECL allowance as a % of total loans and advances to customers carried at amortised cost	30.5 %	29.2 %
	_	_
Split of non-performing loans and advances by time in default	_	_
Legacy/Pre 31 December 2018	36	177
Non Legacy/Post 31 December 2018	184	190
	220	367



## 3.1 Credit risk - Credit profile of the loan portfolio - Asset class analysis

## Income statement

There was a net credit impairment writeback of €3m to the income statement for the year to 31 December 2022 compared to a net credit impairment writeback of €30m for 2021. Net remeasurement of ECL allowance charge of €5m in addition to recoveries of amounts previously written-off of €8m.

The components which contributed to the net remeasurement of ECL allowance charge of €5m were a €2m charge for ECL remeasurement within stage (including impact of updated macroeconomic scenarios and weightings and post model adjustments) and a €3m charge for other P&L items.

Further details are outlined under the management judgements section on pages 29 to 30. The ECL allowance movements are outlined on page 37.

Recoveries of amounts previously written-off amounted to €8m in 2022 (2021: €14m).

## Residential mortgage arrears

Total loans in arrears > 30 days past due (including non-performing loans) by value decreased by 36% during the year to 31 December 2022, a decrease of 19% in the owner-occupier portfolio and a decrease of 67% in the buy-to-let portfolio. The decrease was driven by non performing mortgage portfolio loan sale, net redemptions and arrears resolutions.

## Loans and advances to customers - residential mortgages

Actual and weighted average indexed loan to value ratios of Republic of Ireland residential mortgages

The following table profiles the residential mortgage portfolio by the indexed loan-to-value ratios and the weighted average loan-to-value ratios at 31 December 2022 and 2021

2022 2021 At amortised cost At amortised cost Stage 1 Stage 2 Stage 3 **POCI** Stage 2 Stage 3 POCI Overall **Overall** Stage 1 Total Total €m Less than 80% 206 15 16,839 750 311 17 16,326 16,015 603 15,248 81% - 100% 8 627 674 968 6 982 23 24 100% - 120% 10 3 13 17 3 9 29 2 7 Greater than 120% 2 17 8 32 12 16 Total LTVs 17,005 616 214 15 17,850 15,909 784 351 17 17,061 Unsecured 19 **Total** 17,007 617 216 17 17,857 15,917 787 356 20 17,080 Of which

Of Willeri.										
Owner occupier										
Less than 80%	15,003	517	165	14	15,699	14,090	619	237	16	14,962
81% - 100%	956	7	4	_	967	607	15	14		636
100% - 120%	8	3	_	_	11	13	1	5		19
Greater than 120%	6	1	_	_	8	9	4	1	_	15
Total LTVs	15,974	528	169	15	16,685	14,719	639	258	16	15,632
Unsecured	1	_	1	1	2	6	_	2	1	9
Total	15,975	528	170	15	16,688	14,725	639	260	17	15,641
•		·	·				·			

The weighted average indexed loan-to-value of the stock of residential mortgages at 31 December 2022 was 47%, new residential mortgages issued during the year was 65% and Stage 3 residential mortgages was 43%.

The weighted average indexed loan-to-value of the stock of residential mortgages at 31 December 2021 was 49%, new residential mortgages issued during the year was 67% and Stage 3 residential mortgages was 49%



### 3.1 Credit risk - Credit profile of the loan portfolio

### Gross loans<sup>(1)</sup> and ECL movements

The following tables set out the movements in the gross carrying amount and ECL allowances for loans and advances to customers by ECL staging for the years to 31 December 2022 and 2021.

Amounts that triggered movements between Stage 1 and Stage 2 as a result of failing/curing a quantitative measure only (as disclosed on page 20) and that subsequently reverted within the period to their original stage, are excluded from 'Transferred from Stage 1 to Stage 2' and 'Transferred from Stage 2 to Stage 1'. The Bank believes this presentation aids the understanding of underlying credit migration.

### **Gross carrying amount movements**

					2022*
	Stage 1	Stage 2	Stage 3	POCI	Total
	€m	€m	€m	€m	€m
At 1 January	15,917	787	356	20	17,080
Transferred from Stage 1 to Stage 2	(572)	572	_	_	_
Transferred from Stage 2 to Stage 1	642	(642)	_	_	_
Transferred to Stage 3	(16)	(67)	83	_	_
Transferred from Stage 3	1	74	(75)	_	_
New loans originated/top-ups	2,876	_	_	_	2,876
Redemptions/repayments	(2,242)	(118)	(58)	(3)	(2,421)
Interest credited	387	13	9	1	410
Write-offs	_	_	(5)	_	(5)
Derecognised due to disposals	(1)	(7)	(87)	(1)	(96)
Other movements	15	5	(7)		13
At 31 December	17,007	617	216	17	17,857

					2021*
	Stage 1	Stage 2	Stage 3	POCI	Total
	€m	€m	€m	€m	€m
At 1 January	15,390	1,175	879	41	17,485
Transferred from Stage 1 to Stage 2	(628)	628	_	_	_
Transferred from Stage 2 to Stage 1	915	(915)	_	_	_
Transferred to Stage 3	(20)	(75)	95	_	_
Transferred from Stage 3	_	84	(84)	_	_
New loans originated/top-ups	1,994	_	_	_	1,994
Redemptions/repayments	(2,110)	(137)	(84)	(4)	(2,335)
Interest credited	369	15	8	1	393
Write-offs	_	_	(11)	_	(11)
Derecognised due to disposals	_	(2)	(436)	(18)	(456)
Impact of model, parameter and overlay changes	(1)	1	_	_	_
Other movements	8	13	(11)	_	10
At 31 December	15,917	787	356	20	17,080

<sup>&</sup>lt;sup>(1)</sup>Movements on the gross loans table have been prepared on a 'sum of the months' basis.

<sup>\*</sup>Forms an integral part of the audited financial statements



### 3.1 Credit risk - Credit profile of the loan portfolio

Gross loans and ECL movements (continued) ECL allowance movements

_					2022*
	Stage 1	Stage 2	Stage 3	POCI	Total
	€m	€m	€m	€m	€m
At 1 January	17	18	102	7	144
Transferred from Stage 1 to Stage 2	(1)	6	_]	-1	5
Transferred from Stage 2 to Stage 1	4	(9)	-11	-11	(5)
Transferred to Stage 3	-11	(1)	3	-11	2
Transferred from Stage 3	-11	6	(16)	-11	(10)
Net remeasurement	1	7	3	(1)	10
New loans originated/top-ups	1	-	-11	-11	1
Redemptions/repayments	-11	(1)	-11	-11	(1)
Impact of model and overlay changes	3	(6)	7	(3)	1
Impact of credit or economic risk parameters		1	2		3
Income statement net credit impairment	8	3	(2)	(4)	5
charge/(writeback)	8	3	(2)	(4)	
Write-offs	_	_	(6)	_	(6)
Derecognised due to disposals	_	(2)	(30)	_	(32)
Other movements	_	_	1	(1)	
At 31 December	25	19	65	2	111

					2021*
	Stage 1	Stage 2	Stage 3	POCI	Total
	€m	€m	€m	€m	€m
At 1 January	20	34	251	15	320
Transferred from Stage 1 to Stage 2	(3)	9	_	_	6
Transferred from Stage 2 to Stage 1	7	(14)	_	_	(7)
Transferred to Stage 3	_	(6)	11	_	5
Transferred from Stage 3	_	7	(12)	_	(5)
Net remeasurement	(2)	3	(17)	(1)	(17)
New loans originated/top-ups	2	_	_	_	2
Redemptions/repayments	(1)	(2)	_	_	(3)
Impact of model and overlay changes	7	(4)	36	(3)	36
Impact of credit or economic risk parameters	(13)	(8)	(12)	_	(33)
Income statement net credit impairment (writeback)/charge	(3)	(15)	6	(4)	(16)
Write-offs	_	_	(11)	_	(11)
Derecognised due to disposals	_	_	(145)	(4)	(149)
Other movements		(1)	1	_	
At 31 December	17	18	102	7	144

<sup>\*</sup>Forms an integral part of the audited financial statements



### 3.1 Credit risk - Credit profile of the loan portfolio

### **Gross loans and ECL movements (continued)**

Stage transfers are a key component of ECL allowance movements (i.e. Stage 1 to Stage 2 to Stage 3) being the primary driver of a higher income statement charge (and vice versa) in addition to the net remeasurement of ECL due to change in risk parameters within a stage.

Transfers from Stage 1 to Stage 2 of €572m represent the underlying credit activity where a significant increase in credit risk occurred at some point during the year through either the quantitative or qualitative criteria for stage movement. The main driver of movements to Stage 2 was the doubling of PD since loan origination, subject to a minimum 85bps increase.

Similarly, transfers from Stage 2 to Stage 1 of €642m represent those loans where the triggers for significant increase in credit risk no longer apply or loans that have fulfilled a probation period. These transfers include loans which have been upgraded through normal credit management process.

Transfers to Stage 3 of €83m represent those loans that defaulted during the period. These arose in cases where it was determined that the customers were unlikely to pay their credit obligations in full without the realisation of collateral regardless of the existence of any past due amount or the number of days past due. In addition, transfers also include all credit obligors that are 90 days or more past due on a material obligation.

Transfers from Stage 3 to Stage 2 of €74m were mainly driven by resolution activity with the customer, through either restructuring or forbearance previously granted and which subsequently adhered to default probation requirements. As part of the credit management practices, active monitoring of loans and their adherence to default probation requirements is in place. Transfers from Stage 3 to Stage 1 of €1m primarily reflect curing events from default where no forbearance measure was required.

Reductions due to write-offs continues to reflect the utilisation of ECL stock as a result of the restructure of customer debt in line with the Bank's strategy.

The contractual amount outstanding of loans written-off during the year that are subject to enforcement activity amounted to €1m (2021: €2m) which includes both full and partial write-offs. Total cumulative non-contracted loans written-off at 31 December 2022 amounted to €38m (2021: €99m).

In summary, the staging movements of the overall portfolio were as follows:

Stage 1 loans increased by €1,090m in 2022 with an ECL of €25m and resulting cover of 0.10%. This increase in Stage 1 loans was primarily due to new lending activity exceeding the impact of repayments/redemptions net of interest charged and the impact of net favourable Stage transfers from Stage 2 to Stage 1.

Stage 2 loans decreased by €170m in 2022 with an ECL of €19m and resulting cover of 3.1%. This was driven by repayments or redemptions and loans for which a significant increase in credit risk no longer applied and/or which had completed a probation period.

Stage 3 loans decreased by €140m in 2022 with the ECL cover increasing from 28.56% to 30.20%. The reduction in Stage 3 loans is primarily due to disposal of non-performing mortgage portfolio and net redemptions.



### 3.1 Credit risk - additional credit quality and forbearance disclosures on loans and advances to customers

### **Forbearance**

### **Overview**

Forbearance occurs when a customer is granted a temporary or permanent concession or an agreed change to the existing contracted terms of a facility ('forbearance measure'), for reasons relating to the actual or apparent financial stress or distress of that customer. This also includes a total or partial refinancing of existing debt due to a customer availing of an embedded forbearance clause(s) in their contract. A forbearance agreement is entered into where the customer is in financial difficulty to the extent that they are unable to meet their credit obligations to the Bank in compliance with the existing agreed contracted terms and conditions. A concession or an agreed change to the contracted terms can be of a temporary (e.g. interest only) or permanent (e.g. term extension) nature.

The Bank uses a range of initiatives to support its customers. The Bank considers requests from customers who are experiencing cash flow difficulties on a case by case basis in line with AlB's Forbearance Policy and relevant procedures, and completes an affordability / repayment capacity assessment taking account of factors such as current and likely future financial circumstances, the customer's willingness to resolve such difficulties, and all relevant legal and regulatory obligations to ensure sustainable measures are put in place as appropriate.

AlB's Credit Policies, supported by relevant processes and procedures, are in place which set out the policy rules and principles underpinning the Bank's approach to forbearance, ensuring the forbearance measure(s) provided to customers are affordable and sustainable, and in line with relevant regulatory requirements. Key principles include providing support to enable customers remain in their family home, whenever possible. The Bank has implemented the standards for the Codes of Conduct in relation to customers in actual or apparent financial stress or distress, as set out by the Central Bank of Ireland, ensuring these customers are dealt with in a professional and timely manner.

A request for forbearance is a trigger event for the Bank to undertake an assessment of the customer's financial circumstances prior to any decision to grant a forbearance measure. This may result in the downgrading of the credit grade assigned and an increase in the expected credit loss. Facilities to which forbearance has been applied continue to be classified as forborne until an appropriate probation period has passed. Under the definition of forbearance, which complies with that prescribed by the European Banking Authority, facilities subject to forbearance measures remain in forbearance stock for a minimum period of two years from the date forbearance is granted regardless of the forbearance type.

The effectiveness of forbearance measures over the lifetime of the arrangements are subject to ongoing management review and monitoring of forbearance. A forbearance measure is deemed to be effective if the customer meets the revised or original terms of the contract over a sustained period of time resulting in an improved outcome for the Bank and the customer.

Irish residential mortgages subject to forbearance measures decreased by €201m from €471m at 31 December 2021 to €270m at 31 December 2022. The decrease in the forbearance portfolio was due to the sale of non-performing mortgage portfolio completed during the year. The Bank continues to closely monitor the residential mortgage portfolio for potential latent risk resulting from macroeconomic factors including cost of living and interest rate increases.

### Mortgage portfolio

Under the mandate of the Central Bank's Code of Conduct on Mortgage Arrears ('CCMA'), the Bank introduced a four-step process called the Mortgage Arrears Resolution Process ('MARP'). This process aims to engage with, support and find resolution for mortgage customers (for their primary residence only) who are in arrears, or are at risk of going into arrears

The four step process is summarised as follows:

- Communications We are here to listen, support and provide advice;
- Financial information To allow us to understand the customer finances;
- Assessment Using the financial information to assess the customer's situation; and
- Resolution We work with the customer to find a resolution.

The core objective of the process is to determine sustainable solutions that, where possible, help to keep customers in their family home. In addition to relevant temporary measures (such as interest only and capital and interest moratorium), this includes permanent forbearance measures which have been devised to assist existing Republic of Ireland primary residential mortgage customers in financial difficulty. This process may result in debt write-off, where appropriate. The types of existing permanent forbearance solutions currently include; arrears capitalisation, term extension, split mortgages, negative equity trade down and voluntary sale for loss.



### 3.1 Credit risk - additional credit quality and forbearance disclosures on loans and advances to customers

### Forbearance (continued)

The following table sets out the internal credit ratings and ECL staging of forborne loans and advances to customers at 31 December 2022 and 2021:

	2022	2021
	€m	€m
Analysed by forbearance type		
Temporary forbearance <sup>(1)</sup>	155	273
Permanent forbearance <sup>(2)</sup>	115	198
Total	270	471
	_	
Analysed by internal credit ratings		
Strong	_	_
Satisfactory	_	
Total strong/satisfactory		
Criticised watch	_	_
Criticised recovery	130	191
Total criticised	130	191
Non-performing	140	280
Gross carrying amount	270	471
Analysed by ECL staging		
Stage 1	2	3
Stage 2	117	182
Stage 3	137	269
POCI	14	17
Total	270	471
ECL allowance	48	100

<sup>&</sup>lt;sup>(1)</sup>Of which: interest only €56m, payment moratorium €53m, reduced payment €41m. (2021: interest only €123m, payment moratorium €89m, reduced payment €59m).

<sup>(2)</sup>Of which: arrears capitalisation and term extension €74m, split loan €14m. (2021: arrears capitalisation and term extension €129m, split loan €24m).



#### 3.2 Liquidity and funding risk

Liquidity risk is the risk that the Bank will not be able to fund its assets and meet its payment obligations as they fall due, without incurring unacceptable costs or losses. Funding is the means by which liquidity is generated, e.g. secured or unsecured, corporate or retail. In this respect, funding risk is the risk that a specific form of liquidity cannot be obtained at an acceptable cost.

The Bank's liquidity risk is managed as part of the overall AIB Group liquidity management. In accordance with the Capital Requirements Regulation ('CRR2'), the Bank has appointed AIB as its liquidity manager to fulfil daily cash flow management, oversee any changes required in liquidity management or reporting and manage the Bank's liquidity risk as part of the overall AIB Group liquidity risk management process. Under this centralised approach the management of liquidity and related activities for the Bank is integrated with its parent AIB which is a wholly owned subsidiary of AIB Group.

The means by which these liquidity management activities are performed, and the procedures by which AIB ensures the Bank complies with AIB Group's Funding and Liquidity Risk Policy are managed through a Service Level Agreement ('SLA')).

The Bank is authorised to fund the assets it holds through the following forms of funding:

- the issuance of Mortgage Covered Securities in accordance with the Asset Covered Securities Act, as amended by the Asset Covered Securities Amendment Act, 2007 (the "Act");
- borrowing funds from the parent AIB;
- borrowing from the Central Bank under a Mortgage-Backed Promissory Note (short term) facility ('MBPN Facility') and other funding from the Central Bank under facilities which may be available to the Bank from time to time; and
- capital funding to ensure at a minimum compliance with the capital adequacy requirements of the Single Supervisory Mechanism ('SSM').

If utilised, the MBPN Facility would be secured by a floating charge over a pool of the Bank's home loans and related security which would be separate to the Pool (that secures the Mortgage Covered Securities) maintained by the Issuer in accordance with the Act.

### Identification and assessment

Liquidity and funding risk is identified and assessed by the Bank's Material Risk Assessment ('MRA') process in support of AIB Group Internal Liquidity Adequacy Assessment Process ('ILAAP'). The MRA process is a 'Top-Down' Assessment performed on at least an annual basis and identifies the key material risks to the Bank, taking into account its strategic objectives, in addition to internal and external risk information.

The ILAAP is fully integrated and embedded in the strategic, financial and risk management processes of AIB Group. Embedding of the ILAAP group wide is facilitated through the setting of risk appetite, liquidity and funding planning and the dynamic review thereof in light key strategic decisions.

The Bank adheres to AIB Group's comprehensive ILAAP Framework for managing liquidity risk and complying with AIB Group and Bank's Board risk appetite as well as evolving regulatory standards. This is delivered through a combination of policy formation, governance, analysis, stress testing and limit setting and monitoring, and is part of the wider Risk Management Framework.

#### Management and measurement\*

The objective of liquidity management is to ensure that, at all times, the Bank holds sufficient funds to meet its contracted and contingent commitments to customers and counterparties at an economic price. The ILAAP framework and supporting Funding and Liquidity risk policy set out the key requirements for managing the risk across AIB Group. These include:

- Adherence to both internal limits and regulatory defined liquidity ratios;
- Performing a multiyear projection of AIB Group's funding sources taking into account its baseline scenario, strategy and operational plans as outlined in the AIB Group Funding and Liquidity Plan. The purpose of this Plan is to set out a comprehensive, forward looking liquidity and funding strategy for AIB Group including subsidiary companies;
- Assessing the Funding and Liquidity plan under a range of adverse scenarios, the outcomes of which should ensure sufficient liquidity to implement a sustainable strategy even in a stressed environment;
- Maintaining a Contingency Funding Plan that identifies and quantifies actions that are available to AIB Group in deteriorating liquidity conditions and emerge from a temporary liquidity crisis as a credit worthy institution;
- A further set of triggers and liquidity options outlined in the AIB Group Recovery Plan, which presents the actions available to AIB Group to restore viability in the event of extreme stress.

<sup>\*</sup>Forms an integral part of the audited financial statements



### 3.2 Liquidity and funding risk

### Monitoring, escalating and reporting

The Bank's liquidity and funding position is reported on a regular basis to the Bank's management team and Board. In addition it is reported as part of the overall AIB Group position to the AIB Group Asset and Liability Committee ('ALCo'), the AIB Group Risk Committee ('GRC'), the AIB Group Executive Committee ('ExCo'), the AIB Group Board Risk Committee ('BRC'), and the AIB Group Board.

On an annual basis, the AIB Group Board attests to the AIB Group's liquidity adequacy via the liquidity adequacy statement as part of ILAAP. The AIB Group ILAAP encompasses all aspects of liquidity and funding management, including planning, analysis, stress testing, control, governance, policy and contingency planning. This document is submitted to the Joint Supervisory Team and forms the basis of their supervisory review and evaluation process.

#### Liquidity risk stress testing

Liquidity stress testing is a key component of AIB Group's ILAAP framework. The purpose of these tests is to ensure the continued stability of AIB Group's liquidity position within pre-defined liquidity risk tolerance levels. The Bank, as part of AIB Group, undertakes liquidity risk stress testing that includes both firm specific and systemic risk events and a combination of both as a key liquidity control. Stressed assumptions are applied to AIB Group's liquidity buffer and liquidity risk drivers. This estimates the potential impact of a range of stress scenarios on AIB Group's liquidity position. Actions and strategies available to mitigate the impacts of the stress scenarios are evaluated as to their appropriateness. Liquidity stress test results are reported to the AIB Group ALCo, AIB Group ExCo and AIB Group Board.

#### **Encumbrance**

An asset is defined as encumbered if it has been pledged as collateral and as a result is no longer available to the Bank to secure funding, satisfy collateral needs or to be sold. As part of managing its funding requirements, the Bank encumbers assets as collateral to support its wholesale funding initiatives which are predominantly covered bonds secured over customer loans. The Bank's encumbrance ratio reduced to 56% at 31 December 2022 (2021: 67%) in line with covered bond contractual maturities. The encumbrance level is based on the amount of assets that are required in order to meet regulatory and contractual commitments.

#### Financial liabilities by undiscounted contractual maturity\*

The following table analyses, on an undiscounted basis, financial liabilities by remaining contractual maturity at 31 December 2022 and 2021:

						2022
	On demand	<3 months but not on demand	3 months to 1 year	1-5 years	Over 5 years	Total
	€m	€m	€m	€m	€m	€m
Deposits by banks	8,578	_	_	_	_	8,578
Debt securities in issue	_	1,000	500	5,250	1,524	8,274
Subordinated liabilities	_	_	_	_	300	300
Other liabilities	22	_	_	_	_	22
Total	8,600	1,000	500	5,250	1,824	17,174
Off-balance sheet loan commitments	707	_	_	_	_	707

<sup>\*</sup>Forms an integral part of the audited financial statements



# 3.2 Liquidity and funding risk Financial liabilities by undiscounted contractual maturity\*

						2021
	On demand	<3 months but not on demand	3 months to 1 year	1-5 years	Over 5 years	Total
	€m	€m	€m	€m	€m	€m
Deposits by banks	6,047	_	_	_	_	6,047
Debt securities in issue	_	750	500	5,250	3,025	9,525
Subordinated liabilities	_	_	_	_	300	300
Other liabilities	19	_	_	_	_	19
Total	6,066	750	500	5,250	3,325	15,891
Off-balance sheet loan commitments	843	_	_	_	_	843

### 3.3 Capital adequacy risk\*

Capital adequacy risk is the risk that the Bank breaches or may breach regulatory capital ratios and internal targets, measured on a forward looking basis across a range of scenarios, including a severe but plausible stress.

An annual material risk assessment is undertaken to determine the significant risks to which the Bank is exposed, and ensure that these risks are being appropriately managed.

Capital adequacy risk for the Bank is evaluated through the annual financial planning and internal capital adequacy assessment process ('ICAAP') where the level of capital required to support growth plans and meet regulatory and internal requirements is assessed over the three year planning horizon. The ICAAP is fully integrated and embedded in the strategic, financial and risk management processes of AIB Group. Plans are assessed across a range of scenarios ranging from base case and moderate downside scenarios to a severe but plausible stress using AIB Group's stress testing methodologies. The impact of changing regulatory requirements, changes in the risk profile of the Bank's balance sheet and other internal factors, and changing external risks are regularly assessed by first line of defence and second line of defence teams via regular monitoring of performance against the Financial Plan and Strategy.

The Bank Board reviews and approves the Bank Financial Plan and the supporting stress tests on an annual basis, confirming it is satisfied with the capital adequacy of the Bank. Quarterly reporting of the risk profile including performance against risk appetite is also presented to the Bank's Board.

<sup>\*</sup>Forms an integral part of the audited financial statements



#### 3.4 Market risk

The Bank is exposed to interest rate risk resulting from positions held in the banking book - the Bank does not operate a trading book. Interest rate risk is the current or prospective risk to both the earnings and capital of the Bank as a result of adverse movements in interest rates. Changes in interest rates impact the underlying value of the assets, liabilities and off-balance sheet instruments and, hence, its economic value (or capital position). Similarly, interest rate changes will impact the Bank's net interest income through interest-sensitive income and expense effects.

The Bank is exposed to interest rate risk arising from mortgage lending activities and the issuance of Mortgage Covered Securities. Interest rate swaps, as explained in the paragraphs below, are used to manage this exposure. The Bank is not allowed to engage in proprietary trading under the conditions of the Asset Covered Securities Act and its license. As per the Asset Covered Securities Act, the Bank is required to ensure its sensitivity to interest rate earnings changes under a number of specified scenarios (+/- 100bps parallel and twist shocks) stays below 10% of equity.

The Bank manages this requirement by converting all liability and asset interest rate sensitivity to short term floating rates i.e. it ensures the timing of asset and liability repricing schedules are matched. On the liability side, Internally Issued ACS are issued at spreads to Euribor, which re-price monthly and intercompany funding is also re-priced monthly in reference to Euribor. External ACS issuance is issued at fixed rates in line with market practice and interest rate swaps with AIB are used to convert the interest rate re-pricing profile for this issuance to short term floating Euribor. Fair value hedge accounting is applied to ensure no volatility in earnings.

The interest rate exposure of the Bank relating to its residential lending is managed using interest rate swaps with AIB, one of which, the Pool Hedge, relates only to the Pool and the other of which (the Non-Pool Hedge) relates only to Irish residential loans which are not included in the Pool. This split is required by the Asset Covered Securities Acts.

The Pool Hedge and the Non-Pool Hedge contracts entail the monthly payment of the average customer rate on these mortgages and in return, the receipt of 1 month Euribor plus the current margin being achieved on the mortgage portfolio. The contract is reset each month to reflect the outstanding mortgage balances at that time and to reflect updated customer rates, Euribor and margin levels. Settlements are made between the Bank and AIB to reflect the net amount payable/receivable in each month.

The Pool and Non-Pool Hedge swaps are fair-valued to P&L whereas the mortgage interest rate profile is accrual accounted. The key driver of the volatility in valuation of the Pool and Non-Pool swap structures are changes in fixed term Euro rates and changes in the volume of fixed rate mortgage business. AlB and the Bank amended the Pool and the Non-Pool Hedge structure in December 2013 to include a one-sided free option for the Bank to terminate the swaps without cost on any reset date. Interest rates rose over the course of 2022 as did fixed rate mortgage volumes, consequently the Pool and Non-Pool swaps increased in value. The swaptions have not fallen in value to the same extent as they represent a right but not an obligation to cancel the swaps and therefore they can never have a negative valuation. Market volatility, an input into the valuation of the swaption, has increased contributing to the swaption holding a positive value. The hedge structure continues to work effectively from an economic and market risk perspective.

There is some residual interest rate risk in the Bank. This interest rate risk is transferred centrally to Treasury and Group ALM for management, subject to review and oversight by Group ALCo. Treasury proactively manages the market risk on AlB's balance sheet, Market risk is managed against a range of limits approved at Group ALCo, which incorporate forward-looking measures such as VaR limits and stress test limits and financial measures such embedded value limits. AlB Treasury and Group ALM document an annual Risk Strategy and Appetite Statement as part of the annual financial planning cycle which ensures AlB's market risk aligns with AlB's strategic business plan. The total nominal values of the swaps are set out in note 13 to the financial statements. The Bank is not exposed to any other market risks, i.e. foreign exchange rates or equity prices.



### 3.4 Market risk

### Interest rate sensitivity\*

The net interest rate exposure of the Bank at 31 December 2022 analysed by the earlier of the repricing and the contractual maturity date is illustrated in the following table:

										2022
	0≤1mth	1≤3mths	3≤12mths	1≤2yrs	2≤3yrs	3≤4yrs	4≤5yrs	5yrs+	Non-interest bearing	Total
	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
Assets										
Loans and advances to banks	50	_	_	_	_	_	_	_	_	50
Loans and advances to customers	8,019	162	659	1,170	2,110	2,475	3,090	172	(111)	17,746
Other assets	_	_	_	_	_	_	_	_	770	770
Total assets	8,069	162	659	1,170	2,110	2,475	3,090	172	659	18,566
Liabilities									-	_ _
Deposits by banks	8,578	_	_	_	_	_	_	_	_	8,578
Debt securities in issue	7,249	1,000	_	_	_	_	_	25	_	8,274
Subordinated liabilities	300	_	_	_	_	_	_	_	_	300
Other liabilities	_	_	_	_	_	_	_	_	72	72
Shareholders' equity	_	_	_	_	_	_	_	_	1,342	1,342
Total liabilities	16,127	1,000	_		_	_	_	25	1,414	18,566
Derivatives affecting interest rate sensitivity	(8,823)	(828)	659	1,170	2,110	2,475	3,090	147	<u> </u>	
Interest sensitivity gap	765	(10)	_	_	_	_	_	_	(755)	
Cumulative interest sensitivity gap	765	755	755	755	755	755	755	755		

The impact on net interest income over a twelve month period of a 100 bps downward/upward movement in interest rates on 31 December 2022 would be circa (€12m)/€12m respectively.

<sup>\*</sup>Forms an integral part of the audited financial statements



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# Risk management report

### 3.4 Market risk

### Interest rate sensitivity\*

The net interest rate exposure of the Bank at 31 December 2021 analysed by the earlier of the repricing and the contractual maturity date is illustrated in the following table:

										2021
	0≤1mth	1≤3mths	3≤12mths	1≤2yrs	2≤3yrs	3≤4yrs	4≤5yrs	5yrs+	Non-interest bearing	Total
	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
Assets										
Loans and advances to banks	83	_	_	_	_	_	_	_	_	83
Loans and advances to customers	11,271	68	435	876	1,119	1,677	1,569	65	(144)	16,936
Derivatives and other financial instruments	_	_		_	_	_	_	_	75	75
Other assets	_	_	_	_	_	_	_	_	204	204
Total assets	11,354	68	435	876	1,119	1,677	1,569	65	135	17,298
Liabilities										
Deposits by banks	6,047	_		_	_	_	_	_	_	6,047
Debt securities in issue	7,750	750	_	1,000	_	_	_	25	_	9,525
Subordinated liabilities	300	_	_	_	_	_	_	_	_	300
Other liabilities	_	_	_	_	_	_	_	_	108	108
Shareholders' equity		_	_	_	_	_	_	_	1,318	1,318
Total liabilities and equity	14,097	750	_	1,000	_	_	_	25	1,426	17,298
Derivatives affecting interest rate sensitivity	(5,042)	327	435	(124)	1,119	1,677	1,569	39	<u> </u>	
Interest sensitivity gap	2,299	(1,009)	_				_	1	(1,291)	
Cumulative interest sensitivity gap	2,299	1,290	1,290	1,290	1,290	1,290	1,290	1,291	<u> </u>	
	-									

The impact on net interest income over a twelve month period of a 100 bps downward/upward movement in interest rates on 31 December 2021 would be circa -€5m/€17m respectively.

<sup>\*</sup>Forms an integral part of the audited financial statements



#### 3.5 Operational risk

Operational risk is the risk arising from inadequate or failed internal processes, people and systems or from external events. This includes legal risk – the potential for loss arising from the uncertainty of legal proceedings and potential legal proceedings but excludes strategic and reputational risk.

Operational risk is identified and assessed by the Bank's material risk assessment which is a comprehensive annual top down process undertaken to determine the significant risks to which the Bank is exposed to and ensure that these risks are being appropriately managed. Operational risk is also identified by AIB Group's bottom up risk and control assessment, this process serves to ensure that key operational risks are proactively identified, evaluated, monitored and reported, and appropriate action is taken.

The Bank undertakes an operational risk self-assessment which focuses on activities specific to the Bank, e.g. Bank's funding activities and its compliance with the ACS Act. This process includes periodic assessments of relevant operational risks and the effectiveness of the related controls to address these risks. It complements the risk-based audit approach applied by internal audit on an annual basis in its role as independent assessor of management's control and risk management processes.

The key people, systems and processes are provided by AIB and this relationship is governed by an Outsourcing and Agency Agreement and underpinned by service level agreements with specific AIB Group teams who provide services to the Bank. AIB Group's operational risk framework applies across all areas of AIB Group. A key focus of operational risk management in AIB Group is the oversight of outsourced service activities, in particular activities related to the requirements of the ACS Act, as well as the end-to-end mortgage origination and servicing processes.

Operational risk is measured through the Bank's Board approved risk appetite metrics and key risk indicators are monitored monthly and reported quarterly to the Board.

Operational risk events are identified and captured in the AIB Group's SHIELD system. These are escalated through a defined process depending on impact and severity. Root causes of events are determined, and action plans are implemented to ensure there are enhanced controls in place to keep customers and the business safe.

### 3.6 Regulatory compliance risk

Regulatory compliance risk is defined as the risk of legal or regulatory sanctions, material financial loss, or loss to reputation a bank may suffer as a result of its failure to comply with principal laws, regulations, rules, related self-regulatory codes and related supervisory expectations which relate to the Bank's regulated banking and financial service activities i.e., those activities which the Bank is licenced to conduct business.

The Bank's material risk assessment and AIB Group's risk and control assessment forms the basis for identifying the key elements of regulatory compliance risk. AIB Group's Regulatory Compliance Risk Management Framework sets out the principles, roles and responsibilities, and governance arrangements and is supported by a number of key policies.

The AIB Group Regulatory Compliance Risk Management Framework and the Regulatory Compliance risk management lifecycle commences with upstream regulation risk management. The Regulatory Change Team (RCT) reside within the Regulatory Compliance Team, Compliance & Assurance and provide oversight and support in respect of regulatory change risk management. The approach to regulatory change has been designed to ensure regulatory requirements are clearly understood from the outset with end to end traceability monitored by the Regulatory Forum as part of Group Programme Board ('GPB'). It involves an up-front partnership between the Regulatory Change Team and Change Operations to ensure business stakeholders are identified with roles and accountabilities assigned. The process provides a platform for clear monitoring, communication, effective oversight, robust challenge and the pursuit of regulatory compliance in a collaborative manner across both First and Second Line of Defence.

The Regulatory Compliance Risk Management lifecycle is reviewed on an annual basis by the various teams within Compliance. In order to produce a comprehensive holistic view of Regulatory Compliance Risks across the AIB Group, detailed risk assessments are completed based on the premise of identifying the Regulatory Compliance risks which pose the most significant threat to the AIB Group. Risk identification and assessment is carried out through a combined top-down and bottom-up approach. The output of this risk assessment process is to produce the Compliance & Risk Assurance Plan.

The Regulatory and Conduct Risk Committee (RCR) is the forum that provides risk oversight of regulatory and conduct risks. AlB Group Regulatory Compliance establish written guidance to staff on the appropriate implementation of relevant laws, rules and standards through relevant regulatory compliance policies and supports the business units in understanding and implementing their regulatory compliance obligations. Regulatory Compliance assist the business in maintaining a positive and transparent relationship with the Regulators in respect of regulatory compliance and conduct matters. The Bank' Risk Appetite is also reported to the Board quarterly.



#### 3.7 Conduct risk

Conduct risk is defined as the risk that inappropriate actions or inactions by the Bank cause poor and unfair customer outcomes or negatively impact on market integrity.

Conduct risk is identified and assessed by the Bank's material risk assessment and by the AIB Group's risk and control assessment. The risk and control assessment process provides documentary evidence of risk assessments. It determines the risk profile of the business, drives risk management and actions plans including key risk indicator development and reporting. The risk and control assessment has identified a number of key conduct risks relating to customer satisfaction, employee behaviour and clients, business and product practice.

The Bank uses various approaches to help mitigate risks relating to conduct risk including a Conduct Risk Framework and a Conduct Risk Policy, aligned with AIB Group's strategy, which is embedded in the organisation and provides oversight of conduct risks at Executive Committee and Board level.

AlB Group Conduct Committee provides oversight of conduct through promoting and supporting a 'Customer First' culture. AlB Group Product and Proposition Committee focus is exclusively in product oversight and management, including overseeing a rolling programme of product reviews. The Bank's conduct risk is managed in line with the processes, procedures and organisational structures for the management of Conduct risk within AlB Group.

Conduct risks are assessed and monitored across in line with AIB Group's risk management procedures. Significant conduct events are assessed and remedial actions implemented where necessary. These are escalated based on a materiality assessment, in line with the Conduct Risk Framework and Conduct Risk Policy.

The Regulatory and Conduct Risk Committee ('RCR') is the forum that provides risk oversight of regulatory and conduct risks. The RCR was established by, and is accountable to, the AIB Group Risk Committee to oversee regulatory and conduct risks across AIB Group.

#### 3.8 People and culture risk

People and Culture Risk is the risk to achieving the Bank's strategic objectives as a result of an inability to recruit, retain or develop resources, or the inability to evolve the culture aligned to the Bank 's values and behaviours. The majority of business activities of the Bank are outsourced to AIB under the Outsourcing and Agency Agreement.

People and Culture Risk was identified and assessed as part of the Bank's material risk assessment and as part of the AIB Group's bottom up risk and control process, which serves to ensure that key risks are proactively identified, evaluated, monitored and reported, and that appropriate action is taken. The AIB Group's risk assessment in 2022 has identified the key People and Culture risks including resource capacity, wellbeing and engagement risk, retention risk, talent sourcing and culture risk.

AIB Group have implemented the People and Culture Risk Framework which is supported by various HR policies to drive the consistent management of this risk. Key management actions include:

- 2022 has seen an acceleration in the competition for talent in a buoyant labour market. AIB Group has
  responded with a very strong focus on senior talent identification and has in particular generated increased
  internal talent mobility.
- There has been significant investment in terms of developing capabilities across AIB Group including running a number of Leadership Development and Talent Management programs during the year.
- Enhancement of AIB Group's wellbeing, engagement, inclusion and diversity strategies.
- Continuing the AIB Group's Culture development journey with progress being made throughout the year. AIB
  Group continues to be an active member of the Irish Banking Culture Board.
- The introduction of several progressive family leave policies in 2022 such as surrogacy, fertility treatment and pregnancy loss.
- Continued embedding of the AIB Group's Code of Conduct, incorporating the risk culture principles, places great emphasis on the integrity of employees and accountability for both actions taken and inaction. The Code sets out how employees are expected to behave in terms of the business, customer and employee. The Code is supported by a range of employee policies, including 'Conflicts of Interest' and 'Speak up'. AIB Group has a disciplinary policy which clearly lays out the consequences of inappropriate behaviours.
- Further re-iteration of AIB Group's 'Speak up' policy through the "Speak Your Mind" week held in 2022 that encouraged employees to speak their mind, and in particular the importance of reporting wrongdoing.



#### 3.9 Business model risk

The risk of not achieving the agreed strategy or approved business plan either as a result of an inadequate implementation plan, or failure to execute the implementation plan as a result of inability to secure the required investment, or due to factors in the economic, political, competitive or regulatory environment. This also includes the risk of implementing an unsuitable strategy, or maintaining an obsolete business model, in light of known internal and external factors.

Business model risk was identified as part of the annual Bank's material risk assessment process. The Bank also identifies and assesses this risk as part of its Financial Planning process, which encapsulates strategic, business and financial planning. Every year, the Bank prepares three-year business plans based on macroeconomic and market forecasts across a range of scenarios. The plan includes an evaluation of planned performance against a suite of key metrics, supported by detailed analysis and commentary on underlying trends and drivers, across income statement, balance sheet and targets. The plan is subject to robust review and challenge through the governance process including an independent review and challenge by the AIB Group Risk function.

The Bank's Financial Plan is aligned to its strategy and risk appetite. The business plan typically describes external market conditions, competitor dynamics, business strategy, financial assumptions underpinning the strategy, actions/investment required to achieve financial outcomes and any risks/opportunities to the strategy.

The Bank manages business model risk via its RAS, by setting limits in respect of measures such as financial performance, portfolio concentration and risk-adjusted return. At a more operational level, the risk is mitigated through regular periodic monitoring of actual performance versus plan. Where performance against plan is outside agreed tolerances or risk appetite metrics, proposed mitigating actions are presented and evaluated, and tracked thereafter.

Performance against plan is monitored at Bank level by executive management and Board on a quarterly basis. Risk profile against risk appetite measures, some of which reference performance against plan, is monitored monthly by the AIB Group Risk Function, with breaches of risk appetite relating to the Bank reported to the AIB Group Risk Committee. The Bank's Risk Appetite is reported to the Bank's Executive Management and Board.

### 3.10 Model risk

Model risk is defined as the potential loss the Bank may incur, as a consequence of decisions that could be principally based on the output of models, due to errors in the development, implementation or use of such models.

Model risk is identified and assessed as part of the Bank's top down material risk assessment and also by the bottom-up process of the risk and control assessment which includes a requirement to perform a self-assessment of the risks.

AIB Group mitigates model risk by having an AIB Group Model Risk Framework and supporting policies in place to drive the consistent management of this risk. This sets out the key controls required to mitigate model risk across the model lifecycle, from initiation of a model build through to implementation, use and ongoing monitoring. Models are built by suitably qualified analytical personnel, informed by relevant business and finance functions. Models are built using the best available data, both internal and external and any data weaknesses are appropriately mitigated through the model build. The use of industry standard techniques are applied for stages in the model lifecycle, where appropriate. All models are validated by an appropriately qualified team, which is independent of the model build process. Where issues are identified, appropriate mitigants are applied. Model Risk is measured using a composite assessment of model outcomes across the lifecycle for all models.

The Model Risk Committee acts as a subcommittee of the Risk Measurement Committee, reviews and approves the use, or recommends to a higher governance authority, the use of credit, operational and financial risk models. It also monitors and maintains oversight of the performance of these models.

The Board of the Bank has ultimate accountability for ensuring that the models used by the Bank are fit for purpose and meet all jurisdictional regulatory and accounting standards. Operating to the principles outlined in the Model Risk Framework supports the Bank's strategic objectives and provides comfort to the Board on the integrity and completeness of the model risk governance.



### Statement of Directors' responsibilities

The following statement which should be read in conjunction with the statement of Auditor's responsibilities set out with their Audit Report, is made with a view to distinguishing the respective responsibilities of the Directors and of the Auditor in relation to the financial statements.

The Directors are responsible for preparing the Directors' report and the annual financial statements in accordance with applicable law and regulations.

Company law requires the Directors to prepare financial statements for each financial year. Under that law, the Directors have elected to prepare the Bank's financial statements in accordance with International Financial Reporting Standards ('IFRSs') as adopted by the EU and as applied in accordance with the provisions of the Companies Act 2014.

In preparing these financial statements, the Directors are required to:

- select suitable accounting policies for the Bank's financial statements and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- state that the financial statements comply with IFRSs as adopted by the EU; and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Bank will continue in business.

The Directors are responsible for keeping adequate accounting records that disclose with reasonable accuracy at any time the financial position of the Bank and enable them to ensure that its financial statements comply with the Companies Act 2014. They are also responsible for taking such steps as are reasonably open to them to safeguard the assets of the Bank and to prevent and detect fraud and other irregularities. Under applicable law and corporate governance requirements, the Directors are also responsible for preparing the Directors' Report and the Corporate Governance Report and disclosures relating to the Directors' remuneration that comply with that law.

The Directors are responsible for the maintenance and integrity of the corporate and financial information included on the Bank's website. Legislation in Ireland governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

For and on behalf of the Board,

Eamonn Quinn

Chair

Gerry Gaffney
Executive Director

6 March 2023

Conor McGrath

Managing Director



Independent Auditor's report to the members of AIB Mortgage Bank Unlimited Company

Report on the audit of the financial statements

Opinion on the financial statements of AIB Mortgage Bank Unlimited Company (the 'Bank')

In our opinion, the financial statements:

- give a true and fair view of the assets, liabilities and financial position of the Bank as at 31 December 2022 and of the profit of the Bank for the financial year then ended; and
- have been properly prepared in accordance with the relevant financial reporting framework and, in particular, with the requirements of the Companies Act 2014.

The financial statements we have audited comprise:

- the income statement;
- · the statement of comprehensive income;
- the statement of financial position;
- · the statement of changes in shareholders' equity;
- · the statement of cash flows; and
- the related notes 1 to 34, including a summary of significant accounting policies as set out in note 1.

The relevant financial reporting framework that has been applied in the preparation of the Bank financial statements is the Companies Act 2014 and International Financial Reporting Standards ('IFRS') as adopted by the European Union ('the relevant financial reporting framework).

### **Basis of opinion**

We conducted our audit in accordance with International Standards on Auditing (Ireland) ('ISAs (Ireland)') and applicable law. Our responsibilities under those standards are described below in the "Auditor's responsibilities for the audit of the financial statements" section of our report.

We are independent of the Bank in accordance with the ethical requirements that are relevant to our audit of the financial statements in Ireland, including the Ethical Standard issued by the Irish Auditing and Accounting Supervisory Authority ('IAASA'), as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters	The key audit matters that we identified in the current year were:			
	<ul> <li>Expected credit losses on loans and advances to customers;</li> <li>Provision for FSPO decision; and</li> <li>IT systems and controls.</li> </ul>			
	Within this report, any new key audit matters are identified with 🔘 and any key audit			
	matters which are the same as the prior year are identified with 🤍 .			
Materiality	We determined materiality to be € 13 million which is approximately 1% of total shareholders' equity of the Bank.			
ignificant changes in There were no significant changes in our approach. ur approach				



### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Our evaluation of the Directors' assessment of the Bank's ability to continue to adopt the going concern basis of accounting included consideration of the inherent risks to the Bank's business model. We analysed how those risks might affect the Bank's financial resources or ability to continue operations twelve months from the date of approval of these annual financial statements. The risks that we considered most likely to adversely affect the Bank's available financial resources over this period were:

- availability of funding and liquidity in the event of a market wide stress scenario, including the potential prolonged impacts of inflationary pressures and geopolitical uncertainty on the economy; and
- · the impact on regulatory capital requirements in the event of an economic slowdown or recession.

As these were risks that could potentially cast significant doubt on the Bank's ability to continue as a going concern, our evaluation of the Directors' assessment included:

- understanding the Bank's Capital and Liquidity process including under stressed scenarios;
- evaluating the design and determining the implementation of key controls over the preparation of financial plans and budgets;
- obtaining the updated financial planning exercise covering the period 2023 to 2025 undertaken in the second half of 2022:
- asssessing whether the level of forecasted profits in the updated financial plan were appropriate by challenging the growth, profitability and economic assumptions within;
- evaluating the accuracy of Management's forecasting process by reviewing previous forecasts and comparing to actual results;
- challenging the key assumptions used in the Directors' assessment of the Bank's ability to continue as a going concern;
- · considering the letter of support provided by Allied Irish Banks, p.l.c. to the Bank; and
- evaluating the adequacy of the relevant disclosures made in the financial statements.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Bank's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Directors with respect to going concern are described in the relevant sections of this report.

### **Key Audit Matters**

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current financial year and include the most significant assessed risks of material misstatement (whether or not due to fraud) we identified, including those which had the greatest effect on: the overall audit strategy; the allocation of resources in the audit; and directing the efforts of the engagement team. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.



### Expected credit losses on loans and advances to customers



# Key audit matter description



In line with IFRS 9, losses on financial assets which are classified at amortised cost are recognised on an Expected Credit Loss ('ECL') basis. ECLs are required to incorporate forward looking information, reflecting Management's view of potential future economic environments. The complexity involved in the calculations require Management to develop methodologies involving the use of significant judgements.

Expected credit loss allowances on loans and advances to customers were €111 million at 31 December 2022 (2021: € 144 million).

Measurement of the ECL allowance on loans and advances to customers is a key audit matter as the determination of assumptions for ECLs is highly subjective due to the level of judgement applied by Management. The most significant judgements include:

- Determining the criteria for a significant increase in credit risk ('SICR'), and for a loan being classified as credit impaired;
- The definition of default;
- Accounting interpretations and assumptions used to build the models that calculate the ECL;
- The determination of key assumptions, including collateral valuation and cash flow timings, used in discounted cash flows ('DCFs') of individually assessed loans;
- The completeness and accuracy of data used to calculate the ECL;
- The completeness and valuation of post-model adjustments determined by Management for certain higher risk portfolios and to address known model limitations; and
- Establishing the number and relative weightings for forward looking macroeconomic scenarios applied in measuring the ECL. This is highly subjective given that such assumptions are subject to significant uncertainty related to future economic outcomes, including the potential of inflationary pressures and geopolitical uncertainty.

Please also refer to: page 76 - Accounting Policy (1.12) - Impairment of financial assets, note 2 - Critical accounting judgements and estimates, note 11 - Net credit impairment writeback and note 15 - Loans and advances to customers.

# How the scope of our audit responded to the key audit matter



We tested the operating effectiveness of key controls supporting the calculation of ECLs on loan and advances to customers focusing on:

- model development, validation and approval to ensure compliance with IFRS 9 requirements;
- review and approval of key assumptions, judgements and macroeconomic forward looking information used in the models;
- the integrity of data used as input to the models, including the transfer of data between source systems and the ECL models;
- the application of SICR criteria and the definition of default used to determine stage outcomes;
- governance and approval of post-model adjustments recorded by Management;
- governance and approval of the output of IFRS 9 models; and
- front line credit monitoring and assessment controls including annual case file reviews.

Our testing included an evaluation of the design and implementation of these key controls. Where control deficiencies were identified, we tested compensating controls implemented to produce the ECLs and financial statement disclosures. We also assessed Management review controls and governance controls including attendance at and observation of AIB Board Risk Committee and AIB Group Credit Committee meetings.

We evaluated IT system controls including assessing data inputs and general IT controls. We tested the completeness and accuracy of key data inputs and reconciled to source systems, where appropriate.



# Expected credit losses on loans and advances to customers 💹 (continued)



How the scope of our audit responded to the key audit matter



We critically assessed the ECL models employed by the Bank. In conjunction with Deloitte credit modelling specialists, we challenged judgements and assumptions supporting the ECL requirements of IFRS 9. These included assumptions used in the ECL models applied in stage allocation, calculation of lifetime probability of default and methods applied to derive loss given default rates. We evaluated the methodology and performed code reviews for a sample of models.

We assessed the reasonableness of forward looking information incorporated into the impairment calculations. We challenged the macroeconomic scenarios chosen and changes to the weightings applied. This included benchmarking the economic data used to recognised external data sources. We also considered the impact of key uncertainties, including the potential prolonged impacts of inflationary pressures and geopolitical uncertainty on the economy.

We considered material post-model adjustments applied by Management to address model and data limitations. We challenged the rationale for these adjustments and performed testing on their calculation and application.

In examining a risk based sample of DCF individually assessed loan cases, we challenged Management on the judgements made regarding the application of the default policy, status of loan restructures, collateral valuation and realisation time frames and examined the credit risk functions analysis of data at a portfolio level. Where appropriate, this work involved assessing third party valuations of collateral, internal valuation guidelines derived from benchmark data, external expert reports on borrowers' business plans and enterprise valuations. This allowed us to determine whether appropriate valuation methodologies were used and to assess the objectivity of the external experts used.

We considered significant items impacting the ECL allowance balance. This included portfolio sales and non-contracted write-offs, as well as recoveries on amounts previously written-off.

We evaluated the adequacy of disclosures made in the financial statements. In particular, we focused on challenging Management that the disclosures were sufficiently clear in highlighting the significant uncertainties that exist in respect of the ECL allowance and the sensitivity of the allowance to changes in the underlying assumptions.

Based on the evidence obtained, we found that the ECLs on loans and advances to customers are within a range we consider to be reasonable.



### Provision for FSPO decision



# Key audit matter description



The calculation of the provision for the Financial Services Pension Ombudsman ('FSPO') decision is highly judgemental and involves the use of several Management assumptions including the identification of relevant impacted customers and related redress costs. There is also a risk that known and emerging issues may not be appropriately disclosed in the financial statements. As a result, we consider this a key audit matter.

Included in note 22 - Provisions for liabilities and commitments, the Bank has recorded a provision of € 48 million (2021: € 67 million) for the impact of the FSPO Decision.

Please refer to: page 78 - Accounting Policy (1.15) - Non-credit risk provisions, note 2 - Critical accounting judgements and estimates, note 22 - Provisions for liabilities and commitments, and note 26 - Contingent liabilities and commitments.

# How the scope of our audit responded to the key audit matter



We have evaluated the design and determined the implementation of the Bank's relevant controls over the identification, measurement and the disclosure of the provisions. We also assessed Management review and governance controls around the provisions process.

We challenged the assumptions applied by Management in the calculation of the provision regarding the interpretation of contract terms, the number of customers affected and the potential costs arising from the FSPO decision.

We reviewed the correspondence with regulators, the Financial Services and Pensions Ombudsman and legal advice obtained. We assessed Management's interpretation of the impact of this decision. We reviewed the basis for recording and retaining a provision, taking into consideration the information available and the requirements of IAS 37.

Given the inherent uncertainty in the calculation of the provision and its judgemental nature, we evaluated the adequacy of disclosures made in the financial statements. We challenged Management on the disclosures, in particular, whether they are sufficiently clear in highlighting the exposures that remain, the significant uncertainties that exist in respect of the provisions and the sensitivity of the provisions to changes in the underlying assumptions.

Based on the evidence obtained, we found that the assumptions used by Management in the measurement of the provision for the FSPO decision is within a range we consider to be reasonable.



# IT systems and controls



### **Key audit matter** description



The Bank's financial reporting processes are reliant on processes, controls and data managed by IT systems. The IT environment is complex and pervasive to the operations of the Bank due to the large volume of transactions processed daily and the reliance on automated and IT dependent manual controls. This is also impacted by dependency on third parties and outsourced arrangements.

Our planned audit approach relies extensively on IT applications and the operating effectiveness of the control environment. As part of our assessment of the IT environment, we considered privileged user access management controls to be critical in ensuring that only appropriately authorised changes are made to relevant IT systems. Moreover, appropriate access controls contribute to mitigating the risk of potential fraud or error as a result of inappropriate changes to applications or processing unauthorised transactions.

We regard this area as a key audit matter owing to the high level of IT dependency within the Bank, as well as the associated complexity and the risk that automated controls are not designed and operating effectively.

### How the scope of our audit responded to the key audit matter



We examined the design of the governance framework associated with the Bank's IT architecture. We gained an understanding and tested relevant General IT Controls for systems we considered relevant to the financial reporting process, including access management, programme development and change management.

We gained an understanding of relevant IT controls over applications, operating systems and databases that are relevant for the financial reporting process and tested their operating effectiveness.

We assessed the relevant automated controls within business processes and the reliability of relevant reports used as part of manual controls. This included assessing the integrity of system interfaces, the completeness and accuracy of data feeds and automated calculations.

We tested user access by assessing the controls in place for in-scope applications and verifying the addition and removal of users.

While we identified certain design and operating effectiveness deficiencies in relation to user access controls, we tested validation activities performed by Management and compensating controls to mitigate the risk of fraud or error as a result of unauthorised transactions. Based on this testing we were able to place reliance on IT controls for the purpose of our audit.

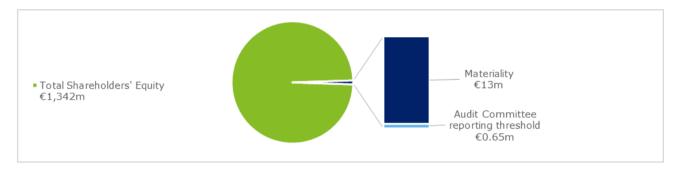
Our audit procedures relating to these matters were designed in the context of our audit of the financial statements as a whole, and not to express an opinion on individual accounts or disclosures. Our opinion on the financial statements is not modified with respect to any of the risks described above, and we do not express an opinion on these individual matters.



### Our application of materiality

We define materiality as the magnitude of misstatement in the financial statements that makes it probable that the economic decisions of a reasonably knowledgeable person would be changed or influenced. We use materiality both in planning the scope of our audit work and in evaluating the results of our work.

Materiality	€13m (2021: €13m)
Basis for determining materiality	1% of Shareholders Equity
Rationale for the benchmark applied	We have considered total shareholders' equity to be the critical component for determining materiality. We used this benchmark taking into consideration the nature of the Bank's operations as being primarily for funding purposes. We have considered quantitative and qualitative factors such as our understanding of the entity and its environment, its history of misstatements, the complexity of the Bank and the reliability of the control environment.



We set performance materiality at a level lower than materiality to reduce the probability that, in aggregate, uncorrected and undetected misstatements exceed the materiality for the financial statements as a whole. Performance materiality was set at 70% of materiality for the 2022 audit. In determining performance materiality, we considered the following factors:

- a. The quality of the control environment and our ability to rely on controls:
- b. Degree of centralisation and commonality of controls and processes;
- c. The uncertain economic environment arising from inflationary pressures and geopolitical uncertainty;
- d. The nature, volume and size of uncorrected misstatements arising in the previous audit; and
- e. The nature, volume and size of uncorrected misstatements that remain uncorrected in the current year.

We agreed with the Audit Committee that we would report to them any audit differences in excess of €0.65m, as well as differences below that threshold which, in our view, warranted reporting on qualitative grounds. We also report to the Audit Committee on disclosure matters that we identified when assessing the overall presentation of the financial statements.

### An overview of the scope of our audit

We determined the scope of our audit by obtaining an understanding of the Bank and its environment, including the controls operating within the Bank, and assessing the risks of material misstatement related to the financial statements of the Bank.

The risks of material misstatement that had the greatest effect on our audit are identified as key audit matters in the table above.

### Other information

The other information comprises the information included in the Directors' Report and Annual Financial Statements other than the financial statements and our auditor's report thereon. The Directors are responsible for the other information contained within the Directors' Report and Annual Financial Statements.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.



### Other information (continued)

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

#### **Responsibilities of Directors**

As explained more fully in the Statement of Directors' responsibilities, the Directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view and otherwise comply with the Companies Act 2014, and for such internal control as the Directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Directors are responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Directors either intend to liquidate the Bank or to cease operations, or have no realistic alternative but to do so.

### Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (Ireland) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on IAASA's website at: <a href="https://iaasa.ie/publications/description-of-the-auditors-responsibilities-for-the-audit-of-the-financial-statements/">https://iaasa.ie/publications/description-of-the-auditors-responsibilities-for-the-audit-of-the-financial-statements/</a>. This description forms part of our auditor's report.

#### Extent to which the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below.

### Identifying and assessing potential risks related to irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, we considered the following:

- the nature of the industry and sector, control environment and business performance including the design of the Bank's remuneration policies;
- results of our enquiries of management, in-house legal counsel, internal audit and the Audit Committee about their own identification and assessment of the risks of irregularities;
- any matters we identified having obtained and reviewed the Bank's documentation of their policies and procedures relating to:
  - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
  - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud;
  - the internal controls established to mitigate risks of fraud or non-compliance with laws and regulations;
- the matters discussed among the audit engagement team and relevant internal specialists, including tax, valuations and IT specialists regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.



### Extent to which the audit was considered capable of detecting irregularities, including fraud (continued)

As a result of these procedures, we considered the opportunities and incentives that may exist within the organisation for fraud and identified the greatest potential for fraud in the following areas: 'Expected credit losses on loans and advances to customers', 'Provision for FSPO decision' and 'Revenue recognition'. In common with all audits under ISAs (Ireland), we are also required to perform specific procedures to respond to the risk of management override.

We also obtained an understanding of the legal and regulatory frameworks that the Bank operates in, focusing on provisions of those laws and regulations that had a direct effect on the determination of material amounts and disclosures in the financial statements. The key laws and regulations we considered in this context included the Irish Companies Act and tax legislation.

In addition, we considered provisions of other laws and regulations that do not have a direct effect on the financial statements but compliance with which may be fundamental to the Bank's ability to operate or to avoid a material penalty. These included the regulation and supervisory requirements of the Central Bank of Ireland.

#### Audit response to risks identified

As a result of performing the above, we identified 'Expected credit losses on loans and advances to customers' and 'Provisions for FSPO decision' as key audit matters related to the potential risk of fraud. The key audit matters section of our report explains the matters in more detail and also describes the specific procedures we performed in response to those key audit matters.

In addition to the above, our procedures to respond to risks identified included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described as having a direct effect on the financial statements;
- enquiring of management, the Audit Committee and in-house legal counsel concerning actual and potential litigation and claims;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud;
- reading minutes of meetings of those charged with governance, reviewing internal audit reports and reviewing correspondence with regulators;
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business; and
- in addressing the risk of fraud through revenue recognition, assessing the design and determining the
  implementation of the key controls over the recognition of interest on stage three loans; and selecting a sample
  of the interest recorded within revenue during the year, and comparing these to relevant documentation.

We also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members including internal specialists and significant component audit teams, and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

### Report on other legal and regulatory requirements

### Opinion on other matters prescribed by the Companies Act 2014

Based solely on the work undertaken in the course of the audit, we report that:

- We have obtained all the information and explanations which we consider necessary for the purposes of our audit
- In our opinion the accounting records of the Bank were sufficient to permit the financial statements to be readily and properly audited.
- The financial statements are in agreement with the accounting records.
- In our opinion the information given in the Directors' Report is consistent with the financial statements and the Directors' report has been prepared in accordance with the Companies Act 2014.



### Corporate Governance Statement required by the Companies Act 2014

We report, in relation to information given in the Corporate Governance Statement on pages 9 to 11 that:

• In our opinion, based on the work undertaken during the course of the audit, the information given in the Corporate Governance Statement pursuant to subsections 2(c) of section 1373 Companies Act 2014 is consistent with the Bank's statutory financial statements in respect of the financial year concerned and such information has been prepared in accordance with the Companies Act 2014. Based on our knowledge and understanding of the Bank and its environment obtained in the course of the audit, we have not identified any material misstatements in this information.

### Matters on which we are required to report by exception

Based on the knowledge and understanding of the Bank and its environment obtained in the course of the audit, we have not identified material misstatements in the Directors' report.

We have nothing to report in respect of the provisions in the Companies Act 2014 which require us to report to you if, in our opinion, the disclosures of Directors' remuneration and transactions specified by law are not made.

### Other matters which we are required to address

Following the recommendation of the Audit Committee of AIB Mortgage Bank, we were appointed at the Annual General Meeting on 28 June 2013 to audit the financial statements for the financial year ended 31 December 2013. The period of total uninterrupted engagement including previous renewals and reappointments of the firm is 10 years, covering the years ending 2013 to 2022.

The non-audit services prohibited by IAASA's Ethical Standard were not provided and we remained independent of the Company in conducting the audit.

Our audit opinion is consistent with the additional report to the audit committee we are required to provide in accordance with ISA (Ireland) 260.



### Use of our report

This report is made solely to the Bank's members, as a body, in accordance with Section 391 of the Companies Act 2014. Our audit work has been undertaken so that we might state to the Bank's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Bank and the Bank's members as a body, for our audit work, for this report, or for the opinions we have formed.

Sinéad Moore For and on behalf of Deloitte Ireland LLP Chartered Accountants and Statutory Audit Firm Deloitte & Touche House, Earlsfort Terrace, Dublin 2

06 March 2023

Notes: An audit does not provide assurance on the maintenance and integrity of the website, including controls used to achieve this, and in particular on whether any changes may have occurred to the financial statements since first published. These matters are the responsibility of the Directors but no control procedures can provide absolute assurance in this area.

Legislation in Ireland governing the preparation and dissemination of financial statements differs from legislation in other jurisdictions.



### Income statement

for the financial year ended 31 December 2022

		2022	2021
	Note	€m	€m
Interest and similar income	3	444	432
Interest and similar expense	4	(160)	(80)
Net interest income		284	352
Net trading income	5	688	48
Net gain on other financial assets measured at FVTPL	6	1	2
Net gain/(loss) on derecognition of financial assets measured at amortised cost	7	5	(5)
Other operating income	8	1	1
Other Income		695	46
Total operating income		979	398
Operating expenses	9	(955)	(405)
Operating profit/(loss) before credit impairment writeback and taxation		24	(7)
Net credit impairment writeback	11	3	30
Operating profit before taxation		27	23
Income tax charge	12	(3)	(3)
Profit for the year		24	20

# Statement of comprehensive income

for the financial year ended 31 December 2022.

	2022	2021 €m
	€m	
Profit for the year	24	20
Other comprehensive income for the year, net of tax	_	
Total comprehensive income for the year	24	20



# Statement of financial position

### as at 31 December 2022

		2022	2021
	Note	€m	€m
Assets			
Derivative financial instruments	13	742	75
Loans and advances to banks	14	50	83
Loans and advances to customers	15	17,746	16,936
Other assets	16	27	203
Current taxation	12	1	_
Deferred tax assets	17	_	1
Total assets		18,566	17,298
Liabilities			
Deposits by banks	18	8,578	6,047
Debt securities in issue	19	8,274	9,525
Current taxation	12	_	2
Other liabilities	20	_	14
Accruals and deferred income	21	22	18
Provisions for liabilities and commitments	22	50	74
Subordinated liabilities	23	300	300
Total liabilities		17,224	15,980
Shareholders' equity			
Issued share capital presented as equity	24	436	436
Capital reserves	25	580	580
Revenue reserves		326	302
Total shareholders' equity		1,342	1,318
Total liabilities and shareholders' equity		18,566	17,298

Eamonn Quinn

Chair

Gerry Gaffney
Executive Director

Conor McGrath

Managing Director

Diane Lumsden
Company Secretary



# Statement of changes in shareholders' equity

for the financial year ended 31 December 2022

	Share capital	Capital reserves	es reserves	Total shareholders' equity €m
	€m	n €m		
At 1 January 2022	436	580	302	1,318
Total comprehensive income for the year				
Profit for the year	_	_	24	24
At 31 December 2022	436	580	326	1,342
At 1 January 2021	436	580	282	1,298
Total comprehensive income for the year				
Profit for the year	_	_	20	20
At 31 December 2021	436	580	302	1,318



### Statement of cash flows

for the financial year ended 31 December 2022

		2022	2021
	Note	€m	€m
Cash flows from operating activities			
Profit before taxation for the year		27	23
Adjustments for:			
Net credit impairment charge/(writeback)	11	5	(16)
Change in provisions for liabilities and commitments	22	(24)	(2)
		8	5
Changes in operating assets and liabilities			
Change in non-current assets held for sale		_	1
Change in derivative financial instruments		(667)	(23)
Change in loans and advances to customers		(815)	245
Change in other assets		176	(173)
Change in customer accounts		_	(1)
Change in other liabilities		(14)	(18)
Change in accruals and deferred income		4	(10)
Net cash flows from operating activities before taxation		(1,308)	26
Taxation (paid)/refund		(5)	4
Net cash flows from operating activities		(1,313)	30
Net cash flows from investing activities			
Cash flows from financing activities			
Change in debt securities in issue	19	(1,251)	(1,150)
Change in deposits by banks	18	2,531	1,133
Net cash flows from financing activities		1,280	(17)
Change in cash and cash equivalents		(33)	13
Cash and cash equivalents at 1 January		83	70
Cash and cash equivalents at 31 December <sup>(1)</sup>	29	50	83

<sup>(1)</sup>Cash and cash equivalent balances include funds held as collateral for derivatives with AIB of nil in 2022 (2021: €63m) and Cash Substitution Pool Assets with Barclays Bank Ireland p.l.c. of €50m in 2022 (2021: €20m). See note 14. Loans and advances to banks.



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#### 1. ACCOUNTING POLICIES

The significant accounting policies that the Bank applied in the preparation of the financial statements for the financial year ended 31 December 2022 are set out in this section.

### 1.1. Reporting entity

AlB Mortgage Bank Unlimited Company ('the Bank') is a public unlimited company operating under the Irish Central Bank Act, 1971 (as amended) and as a designated mortgage credit institution under the Asset Covered Securities Acts 2001 and 2007. The Bank's registered office is 10 Molesworth Street, Dublin 2, Ireland. It is registered under the company number 404926.

It is a wholly owned subsidiary of Allied Irish Banks, p.l.c. ('AlB') which is a wholly owned subsidiary of AlB Group plc, and is regulated by the Single Supervisory Mechanism ('SSM'). Its principal purpose is to issue Mortgage Covered Securities for the purpose of financing loans secured on residential property in accordance with the Asset Covered Securities Acts. Such loans may be made directly by the Bank to customers through the AlB branch network in the Republic of Ireland or may be purchased from AlB and other members of AlB or third parties.

#### 1.2. Statement of compliance

The financial statements have been prepared in accordance with International Accounting Standards and International Financial Reporting Standards (collectively 'IFRSs') as adopted by the European Union ('EU') and applicable for the financial year ended 31 December 2022. The financial statements also comply with the Companies Act 2014 applicable to companies reporting under IFRS and the European Communities (Credit Institutions: Financial Statements) Regulations, 2015, and the Asset Covered Securities Acts 2001 and 2007. The accounting policies have been consistently applied by the Bank and are consistent with the previous year, unless otherwise described.

### 1.3. Basis of preparation

#### Functional and presentation currency

The financial statements are presented in euro, which is the functional currency of the Bank, rounded to the nearest million.

### Basis of measurement and presentation

The financial statements have been prepared under the historical cost basis, with the exception of the following assets and liabilities which are stated at their fair value: derivative financial instruments, financial instruments at fair value through profit or loss, certain hedged financial assets and financial liabilities.

The financial statements comprise the income statement, the statement of comprehensive income, the statement of financial position, the statement of changes in shareholders' equity and the statement of cash flows together with the related notes. These notes also include financial instrument related disclosures which are required by IFRS 7 Financial Instruments: Disclosures and IAS 1 Presentation of Financials Statements contained in the Risk Management section of the annual financial statements. The relevant information on those pages is identified as forming an integral part of the audited financial statements.

### Consideration of climate change

In preparing the financial statements, the Directors have considered the impact of climate change on the Bank's financial reporting judgements and estimates and no material impact has been identified. As a subsidiary in AIB Group, the Bank continues to integrate climate risk into its overall risk management approach and broader sustainability agenda and will participate as appropriate in the Group's commitment to be net zero by 2030.

Whilst there is currently no short or medium-term impact expected from climate change, the Directors are aware of the ever-changing risks attached to climate change and will assess these risks against judgements and estimates made in preparation of the Bank's financial statements.

### Change in presentation of certain items in the primary statements

The Bank has changed the presentation of certain line items in the consolidated statement of financial position and the consolidated income statement to a more appropriate presentation as those line items are no longer material. 'Disposal groups and non-current assets held for sale' are reported within 'other assets' in 2022. The comparatives for 2021 of €1m have been restated accordingly.

### Use of judgements and estimates

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the application of policies and reported amounts of certain assets, liabilities, revenues and expenses, and disclosures of contingent assets and liabilities. The estimates and assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances. Since management's judgement may involve making estimates concerning the likelihood of future events, the actual results could differ from those estimates. The estimates and underlying assumptions are reviewed on an ongoing basis.



### 1. ACCOUNTING POLICIES

### 1.3. Basis of preparation (continued)

Use of judgements and estimates (continued)

Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future period affected. The judgements that have a significant effect on the financial statements and estimates with a significant risk of material adjustment in the next year are in the areas of expected credit losses on financial instruments, of fair value of financial instruments; and provisions for liabilities and commitments.

A description of these judgements and estimates is set out in note 2: 'Critical accounting judgements and estimates' on pages 81 to 82.

### Going concern

The financial statements for the year ended 31 December 2022 have been prepared on a going concern basis as the Directors are satisfied, having considered the risks and uncertainties impacting the Bank, that it has the ability to continue in business for the period of assessment. In making this assessment, the Directors have considered a wide range of information relating to present and future conditions. This includes capital forecasts and internally generated stress scenarios. The scenarios include the impacts of persistent inflation, disruptions to energy supplies, increased interest rates and significant impacts on unemployment and property prices. The period of assessment used by the Directors is at least 12 months from the date of approval of these annual financial statements.

The Bank is dependent on AIB for continued funding and is therefore dependent on the going concern status of the parent. The financial statements of AIB have been prepared on a going concern basis.

There is no intention to liquidate the company or cease trading and the Bank is not aware of any material uncertainties related to conditions or events that may cast significant doubt upon the Bank's ability to continue as a going concern. In addition, the Bank's parent AIB has provided a letter of financial support to the Directors.

#### Conclusion

On the basis of the continued availability of funding from AIB to the Bank, the Board approved financial plans in base and alternative scenarios, including the impacts on global economic activity of the war in Ukraine, the Directors of the Bank believe that it is appropriate to prepare the financial statements on a going concern basis.

#### Adoption of new accounting standards/amendments to standards

The were no new accounting standards/amendments to standards effective for annual periods beginning 1 January 2022 apart from minor amendments to IFRSs through both standalone amendments and through the Annual Improvements to IFRS Standards 2018 – 2020 cycle. None of these had a material impact on reported results or disclosures.

The Bank has not early adopted any other standard, interpretation or amendment that has been issued but is not yet effective.

### 1.4. Interest income and expense recognition

Interest income and expense is recognised in the income statement using the effective interest rate method.

### **Effective interest rate**

The effective interest rate is the rate that exactly discounts the estimated future cash payments or receipts through the expected life of the financial instrument to:

- · the gross carrying amount of the financial asset; or
- · the amortised cost of the financial liability.

The application of the method has the effect of recognising income receivable and expense payable on the instrument evenly in proportion to the amount outstanding over the period to maturity or repayment. In calculating the effective interest rate for financial instruments, other than credit impaired assets, the Bank estimates cash flows (using projections based on its experience of customers' behaviour) considering all contractual terms of the financial instrument but excluding expected credit losses. The calculation takes into account all fees, including those for any expected early redemption, and points paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs and all other premiums and discounts.

All costs associated with mortgage incentive schemes are included in the effective interest rate calculation. Fees and commissions payable to third parties in connection with lending arrangements, where these are direct and incremental costs related to the issue of a financial instrument, are included in interest income as part of the effective interest rate.



#### 1. ACCOUNTING POLICIES

#### 1.4. Interest income and expense recognition (continued)

#### Amortised cost and gross carrying amount

The amortised cost of a financial asset or financial liability is the amount at which the financial asset or financial liability is measured at initial recognition minus the principal repayments, plus or minus the cumulative amortisation using the effective interest rate method of any difference between that initial amount and the maturity amount and, for financial assets, adjusted for any loss allowance.

The gross carrying amount of a financial asset is the amortised cost before adjusting for any loss allowance.

#### Calculation of interest income and interest expense

In calculating interest income and expense, the effective interest rate is applied to the gross carrying amount of the asset (when the asset is not credit impaired) or to the amortised cost of the liability.

For financial assets that have become credit impaired subsequent to initial recognition, interest income is calculated by applying the effective interest rate to the amortised cost of the financial asset. If the asset is no longer credit impaired, the calculation of interest income reverts to the gross basis.

However, for financial assets that were credit impaired on initial recognition, interest income is calculated by applying the credit adjusted effective interest rate to the amortised cost of the financial asset. The calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves.

When a financial asset is no longer credit impaired or has been repaid in full (i.e. cured without financial loss), the Bank presents previously unrecognised interest income as a reversal of credit impairment/recovery of amounts previously written-off.

#### **Presentation**

Interest income and expense presented in the income statement include:

- Interest on financial assets and financial liabilities measured at amortised cost calculated on an effective interest rate basis:
- · Interest on financial assets measured at FVTPL;
- Net interest income and expense on qualifying hedge derivatives designated as cash flow hedges or fair value hedges which are recognised in interest income or interest expense; and
- · Interest income and funding costs of trading portfolio financial assets.

### 1.5. Net trading income

Net trading income comprises gains less losses relating to trading assets and liabilities, and includes all realised and unrealised fair value changes. Interest and dividend income on trading assets are shown in 'interest income' and 'dividend income' respectively.

### 1.6. Income tax, including deferred income tax

Income tax comprises current and deferred tax. Income tax is recognised in the income statement except to the extent that it relates to items recognised in other comprehensive income, in which case it is recognised in other comprehensive income. Income tax relating to items in equity is recognised directly in equity.

Current tax is the expected tax payable on the taxable income for the financial year using tax rates enacted or substantively enacted at the reporting date and any adjustment to tax payable in respect of previous years.

Deferred income tax is provided, using the balance sheet liability method, on temporary differences between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes.

Deferred income tax is determined using tax rates based on legislation enacted or substantively enacted at the reporting date and expected to apply when the deferred tax asset is realised or the deferred tax liability is settled. Deferred income tax assets are recognised when it is probable that future taxable profits will be available against which the temporary differences will be utilised. The deferred tax asset is reviewed at the end of each reporting period and the carrying amount will reflect the extent that it is probable that sufficient taxable profits will be available to allow all of the asset to be recovered.

The tax effects of income tax losses available for carry forward are recognised as an asset to the extent that it is probable that future taxable profits will be available against which these losses can be utilised.



### 1. ACCOUNTING POLICIES

### 1.6. Income tax, including deferred income tax (continued)

Deferred and current tax assets and liabilities are only offset when they arise in the same tax reporting group and where there is both the legal right and the intention to settle the current tax assets and liabilities on a net basis or to realise the asset and settle the liability simultaneously.

Deferred income tax is provided on temporary differences arising from the transition to IFRS 9. In addition, temporary differences are not provided for assets and liabilities the initial recognition of which, in a transaction that is not a business combination, affects neither accounting nor taxable profit. Income tax payable on profits, based on the applicable tax law, is recognised as an expense in the period in which the profits arise.

#### 1.7. Financial assets

#### Recognition and initial measurement

The Bank initially recognises financial assets on the trade date, being the date on which the Bank commits to purchase the assets. Loan assets are recognised when cash is advanced to borrowers. In a situation where the Bank commits to purchase financial assets under a contract which is not considered a regular-way transaction, the assets to be acquired are not recognised until the acquisition contract is settled. In this case, the contract to acquire the financial asset is a derivative that is measured at FVTPL in the period between the trade date and the settlement date.

Financial assets measured at amortised cost or at fair value through other comprehensive income ('FVOCI') are recognised initially at fair value adjusted for direct and incremental transaction costs. Financial assets measured at fair value through profit or loss ('FVTPL') are recognised initially at fair value and transaction costs are taken directly to the income statement.

Derivatives are measured initially at fair value on the date on which the derivative contract is entered into. The best evidence of the fair value of a derivative at initial recognition is the transaction price (i.e. the fair value of the consideration given or received) unless the fair value of that instrument is evidenced by comparison with other observable current market transactions in the same instrument (i.e. without modification or repackaging) or based on a valuation technique whose variables include only data from observable markets. Profits or losses are only recognised on initial recognition of derivatives when there are observable current market transactions or valuation techniques that are based on observable market inputs.

### Classification and subsequent measurement

On initial recognition, a financial asset is classified and subsequently measured at amortised cost, FVOCI or FVTPL. The classification and subsequent measurement of financial assets depend on:

- · The Bank's business model for managing the asset; and
- The cash flow characteristics of the asset (for assets in a 'hold-to-collect' or 'hold-to-collect-and-sell' business model).

Based on these factors, the Bank classifies its financial assets into one of the following categories:

#### - Amortised cost

Assets that have not been designated as at FVTPL, and are held within a 'hold-to-collect' business model whose objective is to hold assets to collect contractual cash flows; and whose contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest ('SPPI'). The carrying amount of these assets is calculated using the effective interest rate method and is adjusted on each measurement date by the expected credit loss allowance for each asset, with movements recognised in profit or loss.

### - Fair value through other comprehensive income ('FVOCI')

Assets that have not been designated as at FVTPL, and are held within a 'hold-to-collect-and-sell' business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and whose contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest ('SPPI'). Movements in the carrying amount of these assets are taken through other comprehensive income ('OCI'), except for the recognition of credit impairment gains or losses, interest revenue or foreign exchange gains and losses, which are recognised in profit or loss. When a financial asset is derecognised, the cumulative gain or loss previously recognised in OCI is reclassified from equity to profit or loss other than in the case of equity instruments designated at FVOCI.



### 1. ACCOUNTING POLICIES

### 1.7. Financial assets (continued)

Classification and subsequent measurement (continued)

### - Fair value through profit or loss ('FVTPL')

Financial assets that do not meet the criteria for amortised cost or FVOCI are measured at FVTPL. Gains or losses (excluding interest income or expense) on such assets are recognised in profit or loss on an ongoing basis.

In addition, the Bank may irrevocably designate a financial asset as at FVTPL that otherwise meets the requirements to be measured at amortised cost or at FVOCI if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise.

### - Embedded derivatives

Certain hybrid contracts may contain both a non-derivative host and an 'embedded derivative'. Under IFRS 9, there is no bifurcation of embedded derivatives from the host financial asset. As a result, such financial assets will generally fail the SPPI test unless the embedded derivative does not substantially modify the cash flows that would otherwise be required by the contract. Those failing the SPPI test will be classified and measured at FVTPL.

### **Business model assessment**

The Bank makes an assessment of the objective of the business model at a portfolio level, as this reflects how portfolios of assets are managed to achieve a particular objective, rather than management's intentions for individual assets.

The assessment considers the following:

- The strategy for the portfolio as communicated by management;
- How the performance of the portfolio is evaluated and reported to senior management;
- The risks that impact the performance of the business model, and how those risks are managed;
- How managers of the business are compensated (i.e. based on fair value of assets managed or on the contractual cash flows collected); and
- The frequency, value and timing of sales in prior periods, reasons for those sales, and expectations of future sales activity.

Financial assets that are held for trading or managed within a business model that is evaluated on a fair value basis are measured at FVTPL because the business objective is neither hold-to-collect contractual cash flows nor hold-to-collect-and-sell contractual cash flows.

### Characteristics of the contractual cash flows

An assessment ('SPPI test') is performed on all financial assets at origination that are held within a 'hold-to-collect' or 'hold-to-collect-and-sell' business model to determine whether the contractual terms of the financial assets give rise on specified dates to cash flows that are solely payments of principal and interest on the principal outstanding. For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset at initial recognition. 'Interest' is defined as consideration for the time value of money, for the credit risk associated with the principal amount outstanding, for other basic lending risks and costs (i.e. liquidity, administrative costs), and profit margin.

The SPPI test requires an assessment of the contractual terms and conditions to determine whether a financial asset contains any terms that could modify the timing or amount of contractual cash flows of the asset, to the extent that they could not be described as solely payments of principal and interest. In making this assessment, the Bank considers:

- Features that modify the time value of money element of interest (e.g. tenor of the interest rate does not correspond with the frequency within which it resets);
- Terms providing for prepayment and extension;
- · Leverage features;
- · Contingent events that could change the amount and timing of cash flows;
- · Terms that limit the Bank's claim to cash flows from specified assets; and
- Contractually linked instruments.

Contractual terms that introduce exposure to risks or volatility in the contractual cash flows that are unrelated to a basic lending arrangement, do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding.

### Reclassifications

Reclassifications of financial assets to alternative asset categories, (e.g. from amortised cost to FVOCI), should be very infrequent, and will only occur when, and only when, the Bank changes its business model for managing a specific portfolio of financial assets.



### 1. ACCOUNTING POLICIES

### 1.8. Financial liabilities

The Bank categorises financial liabilities as at amortised cost or as at fair value through profit or loss. The Bank recognises a financial liability when it becomes party to the contractual provisions of the contract.

Issued financial instruments or their components are classified as liabilities where the substance of the contractual arrangement results in the Bank having a present obligation to either deliver cash or another financial asset to the holder, to exchange financial instruments on terms that are potentially unfavourable or to satisfy the obligation otherwise than by the exchange of a fixed amount of cash or another financial asset for a fixed number of equity shares.

Financial liabilities are initially recognised at fair value, being their issue proceeds (fair value of consideration received) net of transaction costs incurred. Financial liabilities are subsequently measured at amortised cost, with any difference between the proceeds net of transaction costs and the redemption value recognised in the income statement using the effective interest rate method.

The Bank derecognises a financial liability when its contractual obligations are discharged, cancelled or expired. Any gain or loss on the extinguishment or remeasurement of a financial liability is recognised in profit or loss.

### 1.9. Determination of fair value of financial instruments

The fair value of a financial instrument is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal, or in its absence, the most advantageous market to which the Bank has access at that date. The Bank considers the impact of non-performance risk when valuing its financial liabilities.

Financial instruments are initially recognised at fair value and, with the exception of financial assets at fair value through profit or loss, the initial carrying amount is adjusted for direct and incremental transaction costs. In the normal course of business, the fair value on initial recognition is the transaction price (fair value of consideration given or received). If the Bank determines that the fair value at initial recognition differs from the transaction price and the fair value is determined by a quoted price in an active market for the same financial instrument, or by a valuation technique which uses only observable market inputs, the difference between the fair value at initial recognition and the transaction price is recognised as a gain or loss. If the fair value is calculated by a valuation technique that features significant market inputs that are not observable, the difference between the fair value at initial recognition and the transaction price is deferred. Subsequently, the difference is recognised in the income statement on an appropriate basis over the life of the financial instrument, but no later than when the valuation is supported by wholly observable inputs; the transaction matures; or is closed out.

Subsequent to initial recognition, the methods used to determine the fair value of financial instruments include quoted prices in active markets where those prices are considered to represent actual and regularly occurring market transactions. Where quoted prices are not available or are unreliable because of market inactivity, fair values are determined using valuation techniques.

### Quoted prices in active markets

Quoted market prices in active markets are used where those prices are considered to represent actual and regularly occurring market transactions for financial instruments in active markets.

Valuations for negotiable instruments such as debt and equity securities are determined using bid prices for asset positions and ask prices for liability positions.

Where securities are traded on an exchange, the fair value is based on prices from the exchange. The market for debt securities largely operates on an 'over-the-counter' basis which means that there is not an official clearing or exchange price for these security instruments. Therefore, market makers and/or investment banks ('contributors') publish bid and ask levels which reflect an indicative price that they are prepared to buy and sell a particular security. The Bank's valuation policy requires that the prices used in determining the fair value of securities quoted in active markets must be sourced from established market makers and/or investment banks.

### Valuation techniques

In the absence of quoted market prices, and in the case of over-the-counter derivatives, fair value is calculated using valuation techniques. These valuation techniques maximise the use of relevant observable inputs and minimise the use of unobservable inputs. The valuation techniques used incorporate the factors that market participants would take into account in pricing a transaction. Valuation techniques include the use of recent orderly transactions between market participants, reference to other similar instruments, option pricing models, discounted cash flow analysis and other valuation techniques commonly used by market participants.



### 1. ACCOUNTING POLICIES

### 1.9. Determination of fair value of financial instruments (continued)

### Valuation techniques (continued)

Fair value may be estimated using quoted market prices for similar instruments, adjusted for differences between the quoted instrument and the instrument being valued. Where the fair value is calculated using discounted cash flow analysis, the methodology is to use, to the extent possible, market data that is either directly observable or is implied from instrument prices, such as interest rate yield curves, equities and commodities prices, credit spreads, option volatilities and currency rates. In addition, the Bank considers the impact of own credit risk and counterparty risk when valuing its derivative liabilities.

The valuation methodology is to calculate the expected cash flows under the terms of each specific contract and then discount these values back to a present value. The assumptions involved in these valuation techniques include:

- The likelihood and expected timing of future cash flows of the instrument. These cash flows are generally governed by the terms of the instrument, although management judgement may be required when the ability of the counterparty to service the instrument in accordance with the contractual terms is in doubt. In addition, future cash flows may also be sensitive to the occurrence of future events, including changes in market rates; and
- Selecting an appropriate discount rate for the instrument, based on the interest rate yield curves including the
  determination of an appropriate spread for the instrument over the risk-free rate. The spread is adjusted to take into
  account the specific credit risk profile of the exposure.

All adjustments in the calculation of the present value of future cash flows are based on factors market participants would take into account in pricing the financial instrument.

Certain financial instruments (both assets and liabilities) may be valued on the basis of valuation techniques that feature one or more significant market inputs that are not observable. When applying a valuation technique with unobservable data, estimates are made to reflect uncertainties in fair values resulting from a lack of market data, for example, as a result of illiquidity in the market. For these instruments, the fair value measurement is less reliable. Inputs into valuations based on non-observable data are inherently uncertain because there is little or no current market data available from which to determine the price at which an orderly transaction between market participants would occur under current market conditions. However, in most cases there is some market data available on which to base a determination of fair value, for example historical data, and the fair values of most financial instruments will be based on some market observable inputs even where the non-observable inputs are significant. All unobservable inputs used in valuation techniques reflect the assumptions market participants would use when fair valuing the financial instrument.

The Bank tests the outputs of the valuation model to ensure that it reflects current market conditions. The calculation of fair value for any financial instrument may require adjustment of the quoted price or the valuation technique output to reflect the cost of credit risk and the liquidity of the market, if market participants would include one, where these are not embedded in underlying valuation techniques or prices used.

The choice of contributors, the quality of market data used for pricing and the valuation techniques used are all subject to internal review and approval procedures.

### Transfers between levels of the fair value hierarchy

The Bank recognises transfers between levels of the fair value hierarchy at the end of the reporting period during which the change occurred.

### 1.10. Derivatives and hedge accounting

Derivatives, such as interest rate swaps are used for risk management purposes.

### **Derivatives**

Derivatives are measured initially at fair value on the date on which the derivative contract is entered into and subsequently remeasured at fair value. Fair values are obtained from quoted market prices in active markets, including recent market transactions, and from valuation techniques using discounted cash flow models and option pricing models as appropriate. Derivatives are included in assets when their fair value is positive and in liabilities when their fair value is negative, unless there is the legal ability and intention to settle an asset and liability on a net basis.

The best evidence of the fair value of a derivative at initial recognition is the transaction price (i.e. the fair value of the consideration given or received) unless the fair value of that instrument is evidenced by comparison with other observable current market transactions in the same instrument (i.e. without modification or repackaging) or based on a valuation technique whose variables include only data from observable markets.



## 1. ACCOUNTING POLICIES

### 1.10. Derivatives and hedge accounting (continued)

### **Derivatives (continued)**

Profits or losses are only recognised on initial recognition of derivatives when there are observable current market transactions or valuation techniques that are based on observable market inputs.

### Hedging

The Bank has opted to remain with the IAS 39 hedge accounting requirements until macro hedge accounting is addressed by the IASB as part of a separate project. This is an accounting policy choice allowed by IFRS 9 Financial Instruments.

All derivatives are carried at fair value and the accounting treatment of the resulting fair value gain or loss depends on whether the derivative is designated as a hedging instrument, and if so, the nature of the item being hedged. Where derivatives are held for risk management purposes, and where transactions meet the criteria specified in IAS 39 Financial Instruments: Recognition and Measurement, the Bank designates certain derivatives as either:

- · hedges of the fair value of recognised assets or liabilities or firm commitments ('fair value hedge'); or
- hedges of the exposure to variability of cash flows attributable to a recognised asset or liability, or a highly probable forecasted transaction ('cash flow hedge').

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

### The Bank discontinues hedge accounting when:

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

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

In certain circumstances, the Bank may decide to cease hedge accounting even though the hedge relationship continues to be highly effective by no longer designating the financial instrument as a hedge.

### Fair value hedge accounting

Changes in fair value of derivatives that qualify and are designated as fair value hedges are recorded in the income statement, together with changes in the fair value of the hedged asset or liability that are attributable to the hedged risk. If the hedge no longer meets the criteria for hedge accounting, the fair value hedging adjustment cumulatively made to the carrying value of the hedged item is, for items carried at amortised cost, amortised over the period to maturity of the previously designated hedge relationship using the effective interest rate method. If the hedged item is sold or repaid, the unamortised fair value adjustment is recognised immediately in the income statement. Derivatives used to manage interest rate risk arising on mortgage covered securities have been designated as fair value hedges.

### Derivatives that do not qualify for hedge accounting

Certain derivative contracts entered into as economic hedges do not qualify for hedge accounting. Changes in the fair value of these derivative instruments are recognised immediately in the income statement.

Derivatives used to manage interest rate risk arising on mortgage loans to customers do not qualify for hedge accounting. Changes in their fair value are recognised immediately in the income statement.

### 1.11. Derecognition

### Financial assets

The Bank derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Bank neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.



### 1. ACCOUNTING POLICIES

### 1.11. Derecognition (continued)

### Financial assets (continued)

On derecognition of a financial asset, the difference between the carrying amount of the asset and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognised in OCI is recognised in profit or loss. Relevant costs incurred with the disposal of a financial asset are deducted in computing the gain or loss on disposal.

The Bank enters into transactions whereby it transfers assets recognised on its statement of financial position, but retains either all or substantially all of the risks and rewards of the transferred assets or a portion of them. In such cases, the transferred assets are not derecognised. Examples of such transactions are securities lending and sale-and-repurchase transactions.

In transactions in which the Bank neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

In certain transactions where the Bank retains the obligation to service the transferred financial asset for a fee. The transferred asset is derecognised if it meets the derecognition criteria. An asset or liability is recognised for the servicing contract if the servicing fee is more than adequate or is less than adequate for performing the servicing.

The write-off of a financial asset constitutes a derecognition event. Where a financial asset is partially written-off, and the portion written-off comprises specifically identified cash flows, this will constitute a derecognition event for that part written-off.

### 1.12. Impairment of financial assets

The Bank recognises loss allowances for expected credit losses at each balance sheet date for the following financial instruments that are not measured at FVTPL:

- · Financial assets at amortised cost; and
- · Loan commitments issued.

ECLs are the weighted average of credit losses. . When measuring ECLs, the Bank takes into account:

- · probability-weighted outcomes;
- the time value of money so that ECLs are discounted to the reporting date; and
- reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

The amount of ECLs recognised as a loss allowance depends on the extent of credit deterioration since initial recognition. There are two measurement bases:

- 12-month ECLs (Stage 1), which applies to all items as long as there is no significant deterioration in credit quality since initial recognition; and
- Lifetime ECLs (Stages 2 and 3), which applies when a significant increase in credit risk has occurred on an individual or collective basis.

The 12 month ECL is the portion of lifetime expected credit losses that represent the expected credit losses that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Lifetime ECL is the expected credit losses that result from all possible default events over the expected life of a financial instrument.

In the case of Stage 2, credit risk on the financial instrument has increased significantly since initial recognition but the instrument is not considered credit impaired. For a financial instrument in Stage 3, credit risk has increased significantly since initial recognition and the instrument is considered credit impaired.

Financial assets are allocated to stages dependent on credit quality relative to when the asset was originated. A financial asset can only originate in either Stage 1 or as purchased or originated credit impaired ('POCI'). The ECL held against an asset depends on a number of factors, one of which is its stage allocation. Assets allocated to Stage 2 and Stage 3 have lifetime ECLs. Collateral and other credit enhancements are not considered as part of stage allocation. Collateral is reflected in the Bank's loss given default models ('LGD').



### 1. ACCOUNTING POLICIES

1.12. Impairment of financial assets (continued)

Purchased or originated credit impaired

POCI financial assets are those that are credit-impaired on initial recognition. The Bank may originate a credit-impaired financial asset following a substantial modification of a distressed financial asset that resulted in derecognition of the original financial asset.

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

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

At each reporting date, the Bank recognises the amount of the change in lifetime expected credit losses as a credit impairment gain or loss in the income statement. Favourable changes in lifetime expected credit losses are recognised as a credit impairment gain, even if the favourable changes exceed the amount previously recognised in profit or loss as a credit impairment loss.

### Modification

From time to time, the Bank will modify the original terms of a customer's loan either as part of the ongoing relationship or arising from changes in the customer's circumstances such as when that customer is unable to make the agreed original contractual repayments.

A modification refers to either:

- · A change to the previous terms and conditions of a debt contract; or
- · A total or partial refinancing of a debt contract.

Modifications may occur for both customers in distress and for those not in distress. Any financial asset that undergoes a change or renegotiation of cash flows and is not derecognised is a modified financial asset.

When modification does not result in derecognition, the modified assets are treated as the same continuous lending agreement and a modification gain or loss is taken to profit or loss immediately. The gross carrying amount of the financial asset is recalculated as the present value of the renegotiated or modified contractual cash flows discounted at the financial asset's original effective interest rate. Any costs or fees incurred adjust the carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

The stage allocation for modified assets which are not derecognised is by reference to the credit risk at initial recognition of the original, unmodified contractual terms i.e. the date of initial recognition is not reset.

Where renegotiation of the terms of a financial asset leads to a customer granting equity to the Bank in exchange for any loan balance outstanding, the new instrument is recognised at fair value with any difference to the loan carrying amount recognised in the income statement.

Derecognition occurs if a modification or restructure is substantial on a qualitative or quantitative basis. Accordingly, certain forborne assets are derecognised. The modified/restructured asset (derecognised forborne asset ('DFA')) is considered a 'new financial instrument' and the date that the new asset is recognised is the date of initial recognition from this point forward. DFAs are allocated to Stage 1 on origination and follow the normal staging process thereafter.

### Modification

If there is evidence of credit impairment at the time of initial recognition of a DFA, and the fair value at recognition is at a discount to the contractual amount of the obligation, the asset is deemed to be a POCI. POCIs are not allocated to stages but are assigned a lifetime PD and ECL for the duration of the obligation's life. Where the modification/restructure of a non-forborne credit obligation results in derecognition, the new loan is originated in Stage 1 and follows the normal staging process thereafter.



### 1. ACCOUNTING POLICIES

### 1.12. Impairment of financial assets (continued)

**Collateralised financial assets - Repossessions** 

The ECL calculation for a collateralised financial asset reflects the cash flows that may result from foreclosure, costs for obtaining and settling the collateral, and whether or not foreclosure is probable.

For loans that are credit impaired, the Bank may repossess collateral previously pledged as security in order to achieve an orderly realisation of the loan. The Bank will then offer this repossessed collateral for sale. However, if the Bank believes the proceeds of the sale will comprise only part of the recoverable amount of the loan with the customer remaining liable for any outstanding balance, the loan continues to be recognised and the repossessed asset is not recognised. However, if the Bank believes that the sale proceeds of the asset will comprise all or substantially all of the recoverable amount of the loan, the loan is derecognised and the acquired asset is accounted for in accordance with the applicable accounting standard. Any further impairment of the repossessed asset is treated as an impairment of that asset and not as a credit impairment of the original loan.

### Write-offs and debt forgiveness

The Bank reduces the gross carrying amount of a financial asset either partially or fully when there is no reasonable expectation of recovery.

Where there is no formal debt forgiveness agreed with the customer, the Bank may write off a loan either partially or fully when there is no reasonable expectation of recovery. This is considered a non-contracted write-off. In this case, the borrower remains fully liable for the credit obligation and is not advised of the write-off.

Once a financial asset is written-off either partially or fully, the amount written-off cannot subsequently be recognised on the balance sheet. It is only when cash is received in relation to the amount written-off that income is recognised in the income statement as a 'recovery of bad debt previously written-off'.

Debt forgiveness arises where there is a formal contract agreed with the customer for the write-off of a loan.

#### 1.13. Collateral

The Bank obtains collateral in respect of customer advances where this is considered appropriate. The collateral normally takes the form of a lien over the customer's assets and gives the Bank a claim on these assets for both existing and future customer liabilities. The collateral is, in general, not recorded on the statement of financial position.

### 1.14. Non-current assets held for sale

A non-current asset is classified as held for sale if it is expected that its carrying amount will be recovered principally through sale rather than through continuing use, it is available for immediate sale and sale is highly probable within one year. For the sale to be highly probable, the appropriate level of management must be committed to a plan to sell the asset.

On initial classification as held for sale, generally, non-current assets are measured at the lower of previous carrying amount and fair value less costs to sell with any adjustments taken to the income statement. The same applies to gains and losses on subsequent remeasurement. However, financial assets within the scope of IFRS 9 continue to be measured in accordance with that standard.

Impairment losses subsequent to classification of assets as held for sale are recognised in the income statement. Subsequent increases in fair value, less costs to sell of the assets that have been classified as held for sale are recognised in the income statement, to the extent that the increase is not in excess of any cumulative impairment loss previously recognised in respect of the asset. Assets classified as held for sale are not depreciated.

Non-current assets held for sale are presented in Other assets on the statement of financial position. Prior periods are not reclassified.

### 1.15. Non-credit risk provisions

Provisions are recognised for present legal or constructive obligations arising as consequences of past events where it is probable that a transfer of economic benefit will be necessary to settle the obligation, and it can be reliably estimated.

When the effect is material, provisions are determined by discounting expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and, where appropriate, the risks specific to the liability. Payments are deducted from the present value of the provision, and interest at the relevant discount rate is charged annually to interest expense using the effective interest rate method. Changes in the present value of the liability as a result of movements in interest rates are included in other income. These are reported within Provisions for liabilities and commitments in the statement of financial position.



### 1. ACCOUNTING POLICIES

### 1.15. Non-credit risk provisions (continued)

### Legal claims and other contingencies

Provisions are made for legal claims where the Bank has present legal or constructive obligations as a result of past events and it is more likely than not that an outflow of resources will be required to settle the obligation and the amount can be reliably estimated.

Contingent liabilities are possible obligations whose existence will be confirmed only by the occurrence of uncertain future events or present obligations where the transfer of economic benefit is uncertain or cannot be reliably estimated. Contingent liabilities are not recognised but are disclosed in the notes to the financial statements unless the possibility of the transfer of economic benefit is remote.

A provision is recognised for a constructive obligation where a past event has led to an obligating event. This obligating event has left the Bank with little realistic alternative but to settle the obligation and the Bank has created a valid expectation in other parties that it will discharge the obligation.

### 1.16. Shareholders' equity

Issued financial instruments, or their components, are classified as equity where they meet the definition of equity and confer on the holder a residual interest in the assets of the Bank.

On extinguishment of equity instruments, gains or losses arising are recognised net of tax directly in the statement of changes in equity.

### Share capital

Share capital represents funds raised by issuing shares in return for cash or other consideration. Share capital comprises ordinary shares of the entity.

#### Share issue costs

Incremental costs directly attributable to the issue of new shares are charged, net of tax, to equity.

### **Dividends and distributions**

Dividends on ordinary shares are recognised in equity in the period in which they are approved by the Bank's shareholders, or in the case of the interim dividend when they become irrevocable having already been approved for payment by the Board of Directors. The interim dividend may be cancelled at any time prior to the actual payment.

### **Capital reserves**

Capital reserves represent cash contribution from AIB.

### Revenue reserves

Revenue reserves represent retained earnings of the Bank. They also include amounts arising from the capital reduction undertaken by the Bank in June 2019.

### 1.17. Cash and cash equivalents

For the purposes of the cash flow statement, cash comprises cash on hand and cash equivalents comprise highly liquid investments that are convertible into cash with an insignificant risk of changes in value and with a maturity of less than three months from the date of acquisition.

### 1.18. Prospective accounting changes

The following amendments to existing standards which have been approved by the IASB, but not early adopted by the Bank, will impact the Bank's financial reporting in future periods. The Bank will consider the impact of these amendments as the situation requires. The amendments which are most relevant to the Bank are detailed below.

# Amendments to IAS 1 Presentation of Financial Statements and IFRS Practice Statement 2: Disclosure of Accounting Policies

The amendments to IAS 1 and IFRS Practice Statement 2 regarding disclosure of accounting policies which were issued in February 2021, amends IAS 1 in the following way:

- · Disclosure of material accounting policy information is now required instead of significant accounting policies.
- Amendments have been included to clarify that accounting policy information may be material because of its nature, even if the related amounts are immaterial and if users of an entity's financial statements would need it to understand other material information in the financial statements.

Effective date: Annual reporting periods beginning on or after 1 January 2023. These amendments will not have a material impact on the Bank.



### 1. ACCOUNTING POLICIES

1.18. Prospective accounting changes (continued)

Amendments to IAS 8 Accounting policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates

- The amendments to IAS 8 regarding accounting policies, changes in accounting estimates and errors were issued in February 2021 to help entities to distinguish between accounting policies and accounting estimates. The changes relate entirely to accounting estimates and clarify the following:
- The definition of a change in accounting estimates is replaced with a definition of accounting estimates.
- Entities develop accounting estimates if accounting policies require items in financial statements to be measured in a
  way that involves measurement uncertainty.
- A change in accounting estimate that results from new information or new developments is not the correction of an error.
- A change in an accounting estimate may affect only the current period's profit or loss, or the profit or loss of both the current period and future periods.

Effective date: Annual reporting periods beginning on or after 1 January 2023. These amendments will not have a material impact on the Bank.

# Amendments to IAS 12 Income Taxes: Deferred Tax related to Assets and Liabilities arising from a Single Transaction

The amendments to IAS 12 regarding deferred taxes related to assets and liabilities arising from a single transaction which were issued in May 2021, require the following change:

• an exemption from the initial recognition exemption provided in IAS 12.15(b) and IAS 12.24.

Accordingly, the initial recognition exemption does not apply to transactions in which equal amounts of deductible and taxable temporary differences arise on initial recognition.

Effective date: Annual reporting periods beginning on or after 1 January 2023. These amendments will not have a material impact on the Bank.

### Amendments to IAS 1 Classification of Liabilities as Current or Non-current

In January 2020, July 2020 and October 2022, the IASB issued amendments to paragraphs 69 to 76 of IAS 1 to specify the requirements for classifying liabilities as current or non-current. The amendments clarify:

- what is meant by a right to defer settlement;
- that a right to defer must exist at the end of the reporting period;
- · that classification is unaffected by the likelihood that an entity will exercise its deferral right; and;
- that only if an embedded derivative in a convertible liability is itself an equity instrument would the terms of a liability not impact its classification.
- that covenants to be complied with after the reporting date do not affect the classification of debt as current or noncurrent at the reporting date. Instead, information about these covenants should be disclosed in the notes to the financial statements.

Effective date: Annual reporting periods beginning on or after 1 January 2024. These amendments will not have a material impact on the Bank.

### Other

The IASB has published a number of minor amendments to IFRSs through standalone amendments. None of the other amendments are expected to have a significant impact on reported results or disclosures.



### 2. CRITICAL ACCOUNTING JUDGEMENTS AND ESTIMATES

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the application of policies and reported amounts of certain assets, liabilities, revenues and expenses, and disclosures of contingent assets and liabilities. The estimates and assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances. Since management judgement involves making estimates concerning the likelihood of future events, the actual results could differ from those estimates.

The accounting judgements that are deemed critical to the Bank's results and financial position, in terms of the materiality of the items to which the judgements are applied and the estimates that have a significant risk of material adjustment in the next year are set out below.

### Significant judgments

The significant judgements made by the Bank in applying its accounting policies are as follows:

- · Impairment of financial assets; and
- · Provisions for liabilities and commitments;

The application of these judgements also necessarily involves estimations which are discussed separately.

### Impairment of financial assets

The Bank's accounting policy for impairment of financial assets is set out in accounting policy 1.12 in note 1. Details of the Bank's expected credit loss ('ECL') allowance are set out in note 15.

The calculation of the ECL allowance is complex and requires the use of a number of accounting judgements.

The most significant judgements applied by the Bank in estimating the ECL allowance are as follows:

- Determining the criteria for a significant increase in credit risk and for being classified as credit impaired;
- Applying the definition of default policy for classifying financial assets as credit impaired;
- Choosing the appropriate models for measuring ECL; and
- Determining the need for and an appropriate methodology for post-model adjustments.

The significant management judgements and the governance process, relating to ECL, are set out on page 29 to 30 in the Risk Management section.

### Provisions for liabilities and commitments

The Bank's accounting policy for provisions for liabilities and commitments is set out in accounting policy 1.15 'Non-credit risk provisions' in note 1. Details of the Bank's provisions for liabilities and commitments are shown in note 22.

Significant management judgement is required to determine whether the Bank has a present obligation as a result of a past event and whether it is probable an outflow of resources will be required to settle the obligation.

The Bank recognises liabilities where it has present legal or constructive obligations as a result of past events and it is more likely than not that these obligations will result in an outflow of resources to settle the obligations and the amount can be reliably estimated.

Judgement is required in determining whether the Bank has a present obligation and whether it is probable that an outflow of economic benefits will be required to settle this obligation. This judgement is applied to information available at the time of determining the provision including, but not limited to, judgements around interpretations of legislation, regulations and case law depending on the nature of the provision.



### 2. CRITICAL ACCOUNTING JUDGEMENTS AND ESTIMATES

### **Critical accounting estimates**

The accounting estimates with a significant risk of material adjustment to the carrying amounts of assets and liabilities within the next financial year were in relation to:

- · Impairment of financial assets; and
- · Provisions for liabilities and commitments:

### Impairment of financial assets

The Bank's accounting policy for impairment of financial assets is set out in accounting policy 1.12 in note 1. Details of the Bank's ECL allowance are set out in note 15.

The calculation of the ECL allowance is complex and therefore an entity must consider large amounts of information in their determination. This process requires significant use of estimates and assumptions, some of which by their nature, are highly subjective and very sensitive to risk factors such as changes to economic conditions. Changes in the ECL allowance can materially affect net income.

ECL allowance for Loans and advances to customers at 31 December 2022 amounted to €111m (2021: €144m). The ECL for financial assets represents management's best estimate of the expected credit losses on the various portfolios at the respective reporting dates.

The key estimates and assumptions that the Directors have used in determining the ECL allowance are as follows:

- Inputs into discounted cash-flows ('DCFs') for certain Stage 3 credit impaired obligors;
- Establishing the number and relative weightings for forward looking scenarios;
- The assumptions for measuring ECL (e.g. PD, LGD and EAD and the parameters to be included within the models for modelled ECL); and
- The estimation of post model adjustments where required.

Certain of these estimates may have a significant risk of material adjustment to carrying amounts of assets within the next financial year.

Discounted cash-flows ('DCFs') are the most significant input to the ECL calculation for Stage 3 credit-impaired borrowers where the gross credit exposure is ≥ €1 million. Collateral valuations and the estimated time to realisation of collateral is a key component of the DCF model. The DCF assessment produces a base case ECL which is then adjusted to incorporate the impact of multiple scenarios on the base ECL. The size of the adjustment must consider all relevant and supportable information, including but not limited to, historical data analysis, predictive modelling and management judgement.

The macroeconomic variables used in models to calculate ECL allowance are based on assumptions, forecasts and estimates against a backdrop of the residual impact of the COVID-19 pandemic and the economic landscape which are continuously evolving. Accordingly, developments with regard to the pandemic and changes in local and international factors could have a material bearing on the ECL allowance within the next financial year. The Bank's sensitivity to a range of macroeconomic factors under (i) base forecast; (ii) upside; and (iii) downside scenarios is set out on pages 23 to 28 of the Risk Management section of this report.

Certain of these estimates may have a significant risk of material adjustment to carrying amounts of assets within the next financial year.

The Bank has developed a standard approach for the measurement of ECL for the majority of the Bank's exposures where each ECL input parameter (e.g. PD, LGD and EAD) is developed in line with standard modelling methodology. These are discussed further on pages 21 and 22 of the Risk Management section. In addition, where the estimate of ECL does not adequately capture all available forward looking information about the range of possible outcomes, or where there is a significant degree of uncertainty, management may consider it appropriate for an adjustment to ECL. These are referred to as post model adjustments and are set out in detail on pages 29 to 30.

On an ongoing basis, the various estimates and assumptions are reviewed in light of differences between actual and previously calculated expected losses. These are then recalibrated and refined to reflect current and evolving economic conditions. The management process for the calculation of ECL allowance is underpinned by second-line levels of review. The ECL allowance is, in turn, reviewed and approved by AIB Group Credit Committee on a quarterly basis with the final AIB Mortgage Bank levels being approved by the AIB Group Board Audit Committee and AIB Mortgage Bank Audit Committee. Further detail on the ECL governance process is set out on page 30.



### 2. CRITICAL ACCOUNTING JUDGEMENTS AND ESTIMATES

**Critical accounting estimates** 

**Provisions for liabilities and commitments** 

The Bank's accounting policy for provisions for liabilities and commitments is set out in note 1.15 'Non-credit risk provisions' in note 1. Details of the Bank's liabilities and commitments are shown in note 22.

The most significant source of estimation uncertainty, in relation to provisions, is the assumptions that the Bank makes about future events affecting different classes of provisions including the future outcome of litigation and regulatory proceedings as well as the outcome of restitution activities.

The recognition and measurement of liabilities, in certain instances, may involve a high degree of uncertainty, and thereby, considerable time is expended on research in establishing the facts, scenario testing, assessing the probability of the outflow of resources and estimating the amount of any loss. However, at the earlier stages of provisioning, the amount provided for can be very sensitive to the assumptions used and there may be a wide range of possible outcomes in particular cases. Accordingly, in such cases, it is often not practicable to quantify a range of possible outcomes. In addition, it is also not practicable to measure ranges of outcomes in aggregate in a meaningful way because of the diverse nature of these provisions and the differing fact patterns. The estimated potential losses will change over time and the actual losses may vary significantly.

The overall provision amounting to €50m includes €48m in respect of the Financial Services and Pensions Ombudsman ('FSPO') decision relating to tracker mortgage customers and a number of separate provisions, the majority of which are not individually significant and, which do not have a significant risk of a material adjustment in the next financial year. The Bank has not disclosed a range of outcomes for such provisions given their diverse nature and the number of provisions involved.

Note 22 sets out the background and the current position as regards the FSPO decision regarding a tracker complaint and the level of provisions that were set aside. Notwithstanding the payments to customers have effectively concluded, the level of provision required for other costs, including tax liabilities arising that the Bank will be required to discharge on behalf of impacted customers, has been reassessed at €48 million. These issues are subject to uncertainty with a range of outcomes possible with the final outcome being higher or lower depending on finalisation of such issues.



### 3. INTEREST AND SIMILAR INCOME

	2022	2021
	€m	€m
Interest on loans and advances to customers at amortised cost	411	393
Interest earned from AIB	33	39
Interest income calculated using the effective interest method	444	432

Interest earned from AIB is €33m (2021: €39m) and relates to covered securities hedges (bond swaps).

### 4. INTEREST AND SIMILAR EXPENSE

	2022	2021
	€m	€m
Interest on debt securities in issue	11	18
Interest payable to AIB	149	62
Interest expense calculated using the effective interest method	160	80

The interest payable to AIB is interest payable on funding provided by AIB €129m (2021: €50m), and interest payable on loan portfolio swaps of €20m (2021: €12m).

### 5. NET TRADING INCOME

	2022	2021
	€m	€m
Interest rate contracts	688	48
	688	48

The net trading gain of €688m (2021: €48m) reflects a movement in the mark to market valuation of derivatives used to manage interest rate risk arising on mortgage loans to customers and which are not designated in a hedging relationship under IAS 39. Changes in their fair value are recognised immediately in the income statement. The increase in mark to market value of derivatives, which provides an economic hedge for interest rate risk on loans and advances to customers, is due to increased Euro interest rates at 31 December 2022.

### 6. NET GAIN ON OTHER FINANCIAL ASSETS MEASURED AT FVTPL

	2022	2021
9	€m	€m
Loans and advances to customers	1	2
	1	2



### 7. NET GAIN/(LOSS) ON DERECOGNITION OF FINANCIAL ASSETS MEASURED AT AMORTISED COST

		2022
	Carrying value	Gain from
		derecognition
	derecognised	
	financial	
	assets	
	measured at	
a	mortised cost	
	€m	€m
Loans and advances to customers	62	5
	62	5
		2021
o f	Carrying value f derecognised inancial assets measured at amortised cost	Loss from derecognition
	€m	€m
Loans and advances to customers	307	(5)
	307	(5)

Derecognition in 2022 and 2021 arose from the sale of portfolios of non-performing loans. The loans were disposed of for credit management purposes after credit deterioration had occurred.

### **8. OTHER OPERATING INCOME**

	2022	2021
	€m	€m
Miscellaneous operating income	1	1_
	1	1

Other operating income of €1m in 2022 (2021: income €1m) relates to additional income recognised when out of course lodgements are received on loans that required a fair value adjustment on recognition.

### 9. OPERATING EXPENSES

	2022	2021
	€m	€m
Amounts payable to AIB	961	394
Other administrative expenses	(6)	11
	955	405

Amounts payable to AIB are determined by the pricing agreement, based on the Transactional Net Margin Method, which reflects the OECD guidelines on transfer pricing, which are the internationally accepted principles in this area, and which take account of the functions, risks and assets involved. For 2022 this required a net payment of €961m to AIB (2021: €394m).

Other administrative expenses consists of professional fees €1m (2021: €1m), statutory payments (regulatory charges/levies) €10m (2021: €9m), offset by a writeback on provisions and commitments of €17m (2021: €1m charge). See note 22 Provisions for liabilities and commitments for further information.

For the financial year ended 31 December 2022 the monthly average number of employees was nil (2021: nil). As at 31 December 2022, the Bank had no employees (2021: nil).



### 9. OPERATING EXPENSES

In addition a small number of AIB employees maintain a parallel employment relationship with the Bank, in order to facilitate delivery of outsourced service activities under the Outsourcing and Agency Agreement with AIB. These parallel employments are unremunerated. These employees of AIB in the Republic of Ireland have a primary employment relationship with AIB, which maintains day-to-day control over them and remains responsible for the payment of their remuneration as well as accounting for tax and other payroll deductions.

### **Personnel expenses**

Personnel expenses capitalised during the financial year were nil (2021: nil). Personnel expenses borne by AIB are allocated to the Bank under an Outsourcing and Agency Agreement.

#### **Directors' remuneration**

	89	93
Directors' fees	89	93
	€'000	€'000
	2022	2021

The Non-Executive Directors' fees are non-pensionable.

The Directors do not participate in share option plans, therefore there were no gains on exercise of share options during the financial year in accordance with Section 305(1) of the Companies Act 2014.

There were no amounts paid (2021: nil) to persons connected with a Director in accordance with Section 306(1) of the Companies Act 2014.

### 10. AUDITOR'S REMUNERATION

The disclosure of Auditor's remuneration is in accordance with Section 322 of the Companies Act 2014 which mandates remuneration in particular categories and that remuneration paid to the Bank's Auditor (Deloitte Ireland LLP) for services to the Bank be disclosed in this format. Other assurance services include remuneration for additional assurance issued by the firm outside of the audit of the statutory financial statements. Remuneration include assignments where the auditor provides assurance to third parties.

	2022	2021
	€'000	€'000
Auditor remuneration (excluding VAT):		
Audit of financial statements	138	134
Other assurance services - borne by the Parent company	28	_
Tax advisory services	_	_
Other non-audit services	_	
	166	134

The Board and Audit Committee reviews, on an ongoing basis, the level of remuneration for non-audit services when applicable and is satisfied that it has not affected the independence of the Auditor.

All the above amounts were paid to the Bank's Auditor for services provided to the Bank.



### 11. NET CREDIT IMPAIRMENT WRITEBACK

The following table analyses the income statement net credit impairment writeback on financial instruments for the years ended 31 December 2022 and 2021:

		2022		2021
	Measured at amortised cost	Total	Measured at amortised cost	Total
Credit impairment (charge)/writeback on financial instruments	€m	€m	€m	€m
Net measurement of loss allowance:				
Loans and advances to customers	(5)	(5)	16	16
Credit impairment (charge)/writeback	(5)	(5)	16	16
Recoveries of amounts previously written-off	8	8	14	14
Net credit impairment writeback	3	3	30	30

### 12. TAXATION

	2022	2021
	€m	€m
Current tax		
Current tax on income for the financial year	(2)	(2)
Current tax charge for the year	(2)	(2)
Deferred tax		
Origination and reversal of temporary timing differences	(1)	(1)
Deferred tax charge for the year	(1)	(1)
Total tax charge for the year	(3)	(3)
Effective income tax rate	12.5 %	12.5 %

### Factors affecting the effective tax rate

The following table sets out the difference between the tax charge that would result from applying the standard corporation tax rate in Ireland of 12.5% and the actual tax charge for the financial year:

_	2022		2021	
	€m	%	€m	%
Profit before tax	27		23	
Tax charge at standard corporation tax rate in Ireland of 12.5%	(3)	12.5	(3)	12.5
Tax charge	(3)	12.5	(3)	12.5



### 13. DERIVATIVE FINANCIAL INSTRUMENTS

Set out below are details on fair values and derivative information for the Bank. The Bank uses two different types of interest rate swaps to hedge interest rate risk. The first type is used to hedge interest rate risk on mortgage loan accounts both within the Cover Assets Pool and outside the Cover Assets Pool, effectively converting interest receivable from a fixed rate basis to a floating rate basis. Although these swaps are considered to be an effective hedge in economic terms, the Bank has not applied Macro Fair Value hedging relationship under IAS 39 with the mortgage loan accounts and consequently, they are classified as "Held for Trading". AIB and the Bank amended the Pool and the Non-Pool Hedge structure in December 2013 to include a one-sided free option for the Bank to terminate the swaps without cost on any reset date.

The Bank also uses interest rate swaps to hedge the mortgage covered securities, converting interest payable from a fixed rate basis to a floating rate basis. Effective fair value hedging relationships have been established between these swaps and the underlying covered bonds and consequently the change in fair value of the swaps is largely offset by fair value movements in the covered bonds themselves.

All derivatives are carried as assets when fair value is positive and as liabilities when fair value is negative. AlB is the counterparty to all derivative contracts noted below.

			2022			2021
	Contract/ Notional Amount	Fair Value Asset	Fair Value Liability	Contract/ Notional Amount	Fair Value Asset	Fair Value Liability
	€m	€m	€m	€m	€m	€m
Derivatives held for trading						
Interest rate swaps	17,954	736	_	17,278	48	_
Derivatives held for hedging						
Interest rate swaps	1,025	6	_	1,775	27	
Total derivative financial instruments	18,979	742		19,053	75	

The following table analyses the notional principal amount of interest rate derivative contracts by residual maturity together with the positive fair value attaching to these contracts where relevant:

				2022				2021
	Less than 1 year	1 to 5 years	5 years + <sup>(1)</sup>	Total	Less than 1 year	1 to 5 years	5 years + <sup>(1)</sup>	Total
Residual maturity	€m	€m	€m	€m	€m	€m	€m	€m
Notional principal amount	1,000	_	17,979	18,979	750	1,000	17,303	19,053
Positive fair value	4	_	738	742	5	14	56	75

<sup>(1)</sup>the values in 5 years + are based on final maturity date of the Bank's loan portfolio.



### 13. DERIVATIVE FINANCIAL INSTRUMENTS

Nominal values and average interest rates by residual maturity

At 31 December 2022 and 2021, the Bank held the following hedging instruments of interest rate risk in fair value hedges:

						2022
	Less than 1 month		3 months to 1 year	1 to 5 years	5 years +	Total
Fair value hedges - Interest rate swaps						
Hedges of financial liabilities						
Nominal principal amount (€m)	_	1,000	_	_	25	1,025
Average interest rate (%)	_	0.88	_	_	5.12	0.98

						2021
	Less than 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	5 years +	Total
Fair value hedges - Interest rate swaps						
Hedges of financial liabilities						
Nominal principal amount (€m)	_	750	_	1,000	25	1,775
Average interest rate (%)	_	0.63	_	0.88	5.12	0.83

### Fair value hedges of interest rate risk

The tables below set out the amounts relating to (a) items designated as hedging instruments and (b) the hedged items in fair value hedges of interest rate risk together with the related hedge ineffectiveness at 31 December 2022 and 2021:

							2022
_		Carrying	amount			Hedge ineffective	eness
	Nominal amount	Assets	Liabilities	Line item in SOFP* where the hedging instrument is included	Change in fair value of hedging instrument used for calculating hedge ineffectiveness in the year	Hedge ineffectiveness recognised in the income statement	Line item in the income statement that includes hedge ineffectiveness
(a) Hedging instruments	€m	€m	€m		€m	€m	
Interest rate swaps hedging:	_						_
Debt securities in issue	1,025	6	_	Derivative financial instruments	_	_	Net trading income

<sup>\*</sup>Statement of financial position



## 13. DERIVATIVE FINANCIAL INSTRUMENTS

Fair value hedges of interest rate risk (continued)

			,				2022
•	Carrying a hedged recognise SO	litems ed in the	Accumulate fair valu adjustmer hedged iten in the carry of the hec	nts on the ns included ing amount	Line item in SOFP where hedging instrument is included	Change in value of hedged items used for calculating hedge ineffectiveness for the year	Accumulated amount of fair value hedge adjustments remaining in the SOFP for any hedged items that have ceased to be adjusted for hedging gains and losses
-	Assets	Liabilities	Assets	Liabilities			
(b) Hedged items	€m	€m	€m	€m		€m	€m
Interest rate swaps hedging							
Debt securities in issue	_	(1,024)	1		Debt securities in issue	_	_

							2021
-		Carrying amount				Hedge ineff	ectiveness
	Nominal amount	Assets	Liabilities	Line item in SOFP* where the hedging instrument is included	Change in fair value of hedging instrument used for calculating hedge ineffectiveness in the year	Hedge ineffectiveness recognised in the income statement	Line item in the income statement that includes hedge ineffectiveness
(a) Hedging instruments	€m	€m	€m		€m	€m	
Interest rate swaps hedging:							_
Debt securities in issue	1,775	27		Derivative financial instruments		_	Net trading income <sup>(1)</sup>

<sup>(1)</sup>Net trading income is not disclosed in the income statement as it is below €1m.

							2021
	Carrying ar hedged items in the S	recognised	Accumulated amount of fair value hedge adjustments on the hedged items included in the carrying amount of the hedged item		Line item in SOFP where hedging instrument is included	Change in value of hedged items used for calculating hedge ineffectiveness for the year	Accumulated amount of fair value hedge adjustments remaining in the SOFP for any hedged items that have ceased to be adjusted for hedging gains and losses
	Assets	Liabilities	Assets	Liabilities			
(b) Hedged items	€m	€m	€m	€m		€m	€m
Interest rate swaps hedging							
Debt securities in issue	_	(1,788)	_	(13)	Debt securities in issue	_	_



### 14. LOANS AND ADVANCES TO BANKS

	2022	2021
	€m	€m
At amortised cost		
Funds placed with banks	50	20
Funds placed with Group undertaking	_	63
	50	83
ECL allowance	_	<u> </u>
	50	83
Analysed by remaining maturity:		
3 months or less	50	83

The funds placed with banks of €50m (2021: €20m) are held by Barclays Bank Ireland, p.l.c. and represent the Cash substitution pool assets and is a restricted cash balance. Cash substitution pool assets are an Asset Covered Securities Act 2001 (section 6) concept whereby certain non-mortgage assets can be held as part of the Cover Assets Pool in addition to the mortgage credit assets. Covered Asset Monitor (CAM) consent is required to be obtained before cash can be taken out of the Substitution Bank Account held by Barclays.

The Barclays Bank Ireland, p.l.c. credit rating at 31 December 2022 with Standard & Poor's was A. The Bank's covered bond program credit rating at 31 December 2022 with Standard & Poor's was AAA and with Moody's was Aaa.

### 15. LOANS AND ADVANCES TO CUSTOMERS

	2022	2021
	€m	€m
Analysed by remaining maturity:		
Repayable on demand	105	160
3 months or less	2	1
1 year or less but over 3 months	16	19
5 years or less but over 1 year	489	492
Over 5 years	17,245	16,408
Gross carrying amount	17,857	17,080
Expected credit loss allowance	(111)	(144)
Total loans and advances to customers	17,746	16,936

For details of credit quality of loans and advances to customers, including forbearance, refer to the 'Risk management' section of this report.

Amounts repayable on demand includes instances where customers have failed to meet specified repayment terms, and are therefore classified as repayable on demand, in accordance with their lending conditions. Loans and advances to customers comprise AIB branch and intermediary originated residential mortgages in the Republic of Ireland. This portfolio is well diversified by borrower and by geographical location within the Republic of Ireland.

### **ECL** allowance movement

The following table shows the movements on the ECL allowance on loans and advances to customers. Further information is disclosed in the 'Risk management' section of this report.

	2022	2021
	€m	€m
At 1 January	144	320
Net remeasurement of loss allowance - customers	5	(16)
Changes in loss allowance due to write-offs	(5)	(11)
Changes in loss allowance due to disposals	(33)	(149)
At 31 December	111	144



### **16. OTHER ASSETS**

	2022	2021
	€m	€m
Accrued interest	23	21
Proceeds due from disposal of loan portfolio	3	181
Non-current assets held for sale	1	1
	27	203
17. DEFERRED TAXATION		
	2022	2021
	€m	€m
Deferred tax assets:		
Transition to IFRS 9	_	1
Total gross deferred tax assets		1
Net deferred tax assets		1
Analysis of movements in deferred taxation	2022	2021
	€m	€m
At 1 January	1	2
Income statement (note 12)	(1)	(1)
At 31 December		1

The movement in deferred taxation of €1m during 2022 represents the full amortisation of the deferred tax asset created on transition to IFRS 9 (2021: movement of €1m). Deferred tax asset is Nil at 31 December 2022.

### 18. DEPOSITS BY BANKS

	2022	2021
	€m	€m
Due to Allied Irish Banks, p.l.c.	8,578	6,047
	8,578	6,047

The Bank has a borrowing facility with its parent company, AIB, under which the parent company provides the balance of funding after the Bank has availed of other sources of funds. The movement in Deposits by Banks of €2,531m is largely driven by the redemption of covered bonds with a nominal value of €1,250m and increased total assets €1,268m in 2022.



### 19. DEBT SECURITIES IN ISSUE

	2022	2021
	€m	€m
Mortgage covered securities in issue to external investors and internal issuances at nominal value:		
External investors	1,025	1,775
Allied Irish Banks, p.l.c.	7,250	7,750
	8,275	9,525
Mortgage covered securities in issue to external investors and internal issuances at carrying value:		
External investors	1,024	1,775
Allied Irish Banks, p.l.c.	7,250	7,750
	8,274	9,525
Analysed by remaining maturity:		
3 months or less	998	750
1 year or less but over 3 months	500	500
5 years or less but over 1 year	5,250	5,250
Greater than 5 years	1,526	3,025
Carrying value of debt securities <sup>(1)</sup>	8,274	9,525

<sup>(1)</sup> The fair value of hedged liability positions is disclosed in Other liabilities for 2022 and 2021. (See note 20).

The Bank is an issuer of mortgage covered securities under the Asset Covered Securities Act, 2001 as amended by the Asset Covered Securities Amendment Act, 2007 (the "Act"). The Act requires that mortgage covered securities are secured by assets that are included in a Cover Assets Pool maintained by the issuer and that a register of mortgage covered securities business is kept.

At 31 December 2022, the Cover Assets Pool amounted to €15.25bn (2021: €15.50bn), comprising of €15.20bn (2021: €15.48bn) of mortgage credit assets (mortgage loan accounts) and €0.05bn (2021: €0.02bn) of substitution assets (cash on deposit with suitably rated credit institutions). Section 40(2) of the Act requires that the following information be disclosed in respect of mortgage credit assets that are recorded in the register of mortgage covered securities business.

## (a) Mortgaged properties and principal loan balances outstanding in the cover assets pool

### **Total loan balances**

			2022		2021
		Total loan balances	Number of mortgaged properties	Total loan balances	Number of mortgaged properties
		(1 & 2)		(1 & 2)	
From	То	€m		€m	
€0	€100,000	2,254	42,859	2,326	44,302
€100,000	€200,000	5,897	40,504	5,961	40,945
€200,000	€500,000	6,201	22,622	6,373	23,288
Over €500,000	)	850	1,219	822	1,185
		15,202	107,204	15,482	109,720

<sup>(1)</sup> The total loan balances are categorised by the total loan balance outstanding per mortgaged property, including principal and interest charged to the loan accounts, but excluding interest accrued but not charged to the loan accounts.

<sup>(2)</sup> There could be one or more loan accounts per mortgaged property. The Cover Assets Pool contains 118,612 loan accounts (2021: 121,945) secured on —107,204 properties (2021: 109,720).



### 19. DEBT SECURITIES IN ISSUE

### (b) Geographical location of mortgaged properties in the cover assets pool

Geographical Area		2022		2021
	Number of Mortgage	ed Properties	Number of Mortgag	ed Properties
Dublin	27,861	26 %	28,856	26%
Outside Dublin	79,343	74 %	80,864	74%
	107,204	100 %	109,720	100%

### (c) Mortgage loan accounts in default in the cover assets pool

As at 31 December 2022, there were no mortgage loan accounts (2021: nil) in default in the Cover Assets Pool (in default being defined as impaired mortgage loan accounts).

### (d) Mortgage loan accounts in default in the cover assets pool with arrears greater than €1,000

During the financial year ended 31 December 2022, there were no mortgage loan accounts (2021: 2) in the Cover Assets Pool had been in default with arrears greater than €1,000.

### (e) Replacement of non-performing mortgage loan accounts from the cover assets pool

During the financial year ended 31 December 2022, non-performing mortgage loan accounts which were removed from the Cover Assets Pool were not replaced with other assets as the Cover Assets Pool continued to meet all regulatory requirements.

### (f) Amount of interest in arrears on mortgage loan accounts in the cover assets pool not written off

The total amount in arrears (including principal and interest) in respect of 953 accounts (2021: 1,160) as at 31 December 2022 was €869,531 (2021: €1,271,940), €302,389 (2021: €266,846) of which represented non-payment of interest. None of the accounts in question were written off as at 31 December 2022 as they were in arrears for less than three months.

### (g) Total principal and interest payments on mortgage loan accounts

The total amount of repayments (principal and interest) made by customers on mortgage loan accounts in the Cover Assets Pool during the year ended 31 December 2022 was €2,200m (2021: €2,131m), of which €1,832m (2021: €1,779m) represented repayment of principal and €368m (2021: €352m) represented payment of interest. The repayments of principal include the repayment of mortgage loan accounts by customers closing their existing accounts when opening a new account.

### (h) Number and amount of mortgage loans in the cover assets pool secured on commercial property

As at 31 December 2022 there were no loan accounts (2021: nil) in the Cover Assets Pool that were secured on commercial properties.

### 20. OTHER LIABILITIES

	2022	2021
9	€m	€m
Sundry creditors	_	1
Fair value of hedged liability positions	_	13
	_	14

### 21. ACCRUALS AND DEFERRED INCOME

	2022	2021
	€m	€m
Accrued interest	18	14
Other accrued expense	4	4
	22	18



### 22. PROVISIONS FOR LIABILITIES AND COMMITMENTS

	2022	2021
	€m	€m
At 1 January 2022	74	76
Charged to income statement	_	1
Released to income statement	(17)	_
Provisions utilised	(7)	(3)
At 31 December	50	74

The total provisions for liabilities and commitments expected to be settled within one year amount to €50m (2021: €74m).

#### Provisions for customer redress and other costs

The provision at 31 December 2022 for customer redress and compensation and other related costs amounted to €50m, of which €48m is for the 2020 FSPO Decision (further information below) and €2m is for the Tracker Mortgage Examination appeals cases (31 December 2021: €67m and €7m respectively).

#### **FSPO Decision:**

The provision at 31 December 2022 for customer redress and compensation and other related costs amounted to €48m (31 December 2021: €67m) in respect of certain mortgage customers – the '06-09 Terms & Conditions ('Ts&Cs') who never had a tracker' cohort.

In 2020, following a Financial Services and Pensions Ombudsman ('FSPO') decision in relation to a complaint by a customer from the Ts&Cs who never had a tracker' cohort, which found that the Bank had breached the terms of the customer's mortgage loan contract and directed it to remedy the matter in what the FSPO believed was a fair and proportionate manner, AIB Group decided to accept the decision in full.

Furthermore, the Bank decided to apply the remedy to all other customers within this cohort, and payments to customers on that basis have effectively concluded.

The Bank has continued to engage with stakeholders over the intervening period and a number of related issues continue to exist that have yet to be resolved, including tax liabilities arising that the Bank will be required to discharge on behalf of impacted customers. Following utilisations of €2m in the year the level of provision required for these other costs has been reassessed at €48m at 31 December 2022.

These issues are subject to uncertainty with a range of outcomes possible with the final outcome being higher or lower depending on finalisation of such issues.



### 23. SUBORDINATED LIABILITIES

		2022	2021
	Notes	€m	€m
Dated capital note	(a)	100	100
Perpetual capital note	(b)	200	200
		300	300

(a) €100,000,000 Dated Subordinated Capital Note – the loan to which this note relates was received from the parent company, AIB on 13 February 2006. The Note has a fixed maturity date of 12 February 2031. Early repayment may occur at the option of the Bank with the prior consent of the Central Bank of Ireland on any interest payment date falling any time after five years and one day from the date of issuing the Note.

Interest on the amount of principle is calculated on a year of 360 days at a rate of 53 basis points over Euribor payable monthly in arrears and is reflected in note 4 'Interest and similar expense'.

(b) €200,000,000 Subordinated Perpetual Capital Note – the loan to which this note relates was received from AIB on 13 February 2006. The Note is undated and has no final maturity date but may be redeemed at the option of the Bank with the prior consent of the Central Bank at any time after the fifth anniversary of its issue.

Interest on the amount of principle is calculated on a year of 360 days at a rate of 100 basis points over Euribor payable monthly in arrears and is reflected in note 4 'Interest and similar expense'.

The two capital notes are unsecured and all rights and claims of AIB shall be subordinated to the claims of all creditors who are depositors or other unsubordinated creditors of the Bank and creditors of the Bank whose claims are subordinated to the claims of depositors and other unsubordinated creditors of the Bank but excluding pari passu Subordinated Creditors and those creditors of the Bank whose claims rank or are expressed to rank junior to the claims of AIB.

### 24. ISSUED SHARE CAPITAL PRESENTED AS EQUITY

		2022		2021		
	Number of shares Shares		1			
	m	€m	m	€m		
Authorised:						
Ordinary share capital						
Ordinary shares of €0.25 each	3,000	750	3,000	750		
Issued and fully paid up:						
Ordinary share capital						
Ordinary shares of €0.25 each	1,745	436	1,745	436		

There were no movements in issued share capital during 2022 and 2021.

The holders of ordinary shares are entitled to receive dividends as declared from time to time and are entitled to one vote per share at meetings of the Bank. All shares rank equally with regard to the Bank's residual assets.



707

843

## Notes to the financial statements

### **25. CAPITAL RESERVES**

	2022	2021
	€m	ı €m
At 1 January	580	580
At 31 December	580	580

Capital reserves represent cash contribution from AIB.

### 26. CONTINGENT LIABILITIES AND COMMITMENTS

26. CONTINGENT LIABILITIES AND COMMITMENTS		
	Contract am	ount
	2022	2021
	€m	€m
Contingent liabilities <sup>(1)</sup> – credit related	_	_
Commitments <sup>(2)</sup>		
Undrawn formal standby facilities, credit lines and other commitments to lend:		
Less than 1 year	669	807
1 year and over	38	36
	707	843

<sup>&</sup>lt;sup>(1)</sup>Contingent liabilities are off-balance sheet products and include guarantees, standby letters of credit and other contingent liability products such as performance bonds, contract bonds and custom bonds.

### Off balance sheet commitments

In the normal course of business, the Bank is a party to financial instruments with off-balance sheet risk to meet the financing needs of customers. These instruments involve, to varying degrees, elements of credit risk which are not reflected in the consolidated statement of financial position. Credit risk is defined as the possibility of sustaining a loss because the other party to a financial instrument fails to perform in accordance with the terms of the contract.

The Bank's maximum exposure to credit loss under contingent liabilities and commitments to extend credit, in the event of non-performance by the other party where all counterclaims, collateral or security prove valueless, is represented by the contractual amounts of those instruments.

The Bank uses the same credit control and risk management policies in undertaking off-balance sheet commitments as it does for 'on- balance sheet lending'.

At 31 December 2022 the Bank had €707m (2021: €843m) of approved mortgage loan applications that had not been drawn down as at the year end.

Loan commitments are classified and measured in accordance with IFRS 9. The Bank's accounting policy for the recognition of ECL allowances on loan commitments is set out in accounting policy 1.12 Impairment of financial assets.

The loan commitments were assessed for an ECL at 31 December 2022, it was determined that the ECL was immaterial (2021: immaterial).

### Legal proceedings

The Bank, in the course of its business, is frequently involved in litigation cases. However, it is not, nor has been involved in, nor are there, so far as the Bank is aware, (other than as set out in the following paragraphs), pending or threatened by or against the Bank any legal or arbitration proceedings, including governmental proceedings, which may have, or have had during the previous twelve months, a material effect on the financial position, profitability or cash flows of the Bank.

<sup>(2)</sup>A commitment is an off-balance sheet product, where there is an agreement to provide an undrawn credit facility. The contract may or may not be cancelled unconditionally at any time without notice depending on the terms of the contract.



# 26. CONTINGENT LIABILITIES AND COMMITMENTS Legal proceedings (continued)

Specifically, litigation has been served on the Bank by customers that are pursuing claims in relation to tracker mortgages. Customers have also lodged complaints to the FSPO in relation to tracker mortgages issues which are outlined in 'Provisions for liabilities and commitments' (note 22).

Further claims may also be served in the future in relation to tracker mortgages. The Bank may also receive further decisions by the FSPO in relation to complaints concerning tracker mortgages.

Based on the facts currently known and the current stages that the litigation and the FSPO's complaints process are at, it is not practicable at this time to predict the final outcome of this litigation / FSPO complaints, nor the timing and possible impact on the Bank.

### 27. CLASSIFICATION AND MEASUREMENT OF FINANCIAL ASSETS AND FINANCIAL LIABILITIES

Financial assets and financial liabilities are measured on an ongoing basis either at fair value or at amortised cost. The accounting policy for financial assets in note 1.11 and financial liabilities in note 1.12, describes how the classes of financial instruments are measured, and how income and expenses, including fair value gains and losses, are recognised.

The following table analyses at 31 December 2022 and 2021 the carrying amounts of the financial assets and financial liabilities by measurement category as defined in IFRS 9 *Financial Instruments* and by statement of financial position heading.

			2022
	At fair value through profit and loss	At amortised cost	Total
	Mandatorily		
	€m	€m	€m
Financial assets			
Cash and balances at central banks	_	_	_
Cash and cash equivalents	_	_	_
Items in the course of collection	_	_	_
Derivative financial instruments	742	_	742
Loans and advances to banks	_	50	50
Loans and advances to customers	_	17,746	17,746
Amounts due from Group undertakings	_	_	_
Investment securities	_	_	_
Other financial assets		26	26
	742	17,822	18,564
Financial liabilities			
Deposits by banks	_	8,578	8,578
Debt securities in issue	_	8,274	8,274
Subordinated liabilities	_	300	300
Other financial liabilities		22	22
		17,174	17,174



### 27. CLASSIFICATION AND MEASUREMENT OF FINANCIAL ASSETS AND FINANCIAL LIABILITIES

			2021
	At fair value through profit and loss	At amortised cost	Total
	Mandatorily		
	€m	€m	€m
Financial assets			
Derivative financial instruments	75	_	75
Loans and advances to banks	<del>-</del>	83	83
Loans and advances to customers	<del>-</del>	16,936	16,936
Other financial assets	<u> </u>	202	202
	75	17,221	17,296
Financial liabilities			
Deposits by banks	<del>_</del>	6,047	6,047
Debt securities in issue	<del>_</del>	9,525	9,525
Subordinated liabilities	<del>_</del>	300	300
Other financial liabilities	<u> </u>	19	19
		15,891	15,891

### 28. FAIR VALUE OF FINANCIAL INSTRUMENTS

The term 'financial instruments' includes both financial assets and financial liabilities. The fair value of a financial instrument is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal, or in its absence, the most advantageous market to which the Bank has access at that date. The Bank's accounting policy for the determination of fair value of financial instruments is set out in accounting policy 1.9.

The valuation of financial instruments, including loans and advances, involves the application of judgement and estimation. Market and credit risks are key assumptions in the estimation of the fair value of loans and advances. The Bank has estimated the fair value of its loans to customers taking into account market risk and the changes in credit quality of its borrowers.

Fair values are based on observable market prices, where available, and on valuation models or techniques where the lack of market liquidity means that observable prices are unavailable. The fair values of financial instruments are measured according to the following fair value hierarchy:

- Level 1 financial assets and liabilities measured using quoted market prices from an active market (unadjusted).
- Level 2 financial assets and liabilities measured using valuation techniques which use quoted market prices from an active market or measured using quoted market prices unadjusted from an inactive market.
- Level 3 financial assets and liabilities measured using valuation techniques which use unobservable inputs.

All financial instruments are initially recognised at fair value. Financial instruments held for trading and financial instruments in fair value hedge relationships are subsequently measured at fair value through profit or loss.

All valuations are carried out within the Finance function of AIB and valuation methodologies are validated by the Risk function within AIB.

Readers of these financial statements are advised to use caution when using the data in the following tables to evaluate the Bank's financial position or to make comparisons with other institutions. Fair value information is not provided for items that do not meet the definition of a financial instrument such as shareholders' equity. These items are material and accordingly, the fair value information presented does not purport to represent, nor should it be construed to represent, the underlying value of the Bank as a going concern at 31 December 2022.



### 28. FAIR VALUE OF FINANCIAL INSTRUMENTS

The methods used for calculation of fair value are as follows:

# Financial instruments measured at fair value in the financial statements Derivative financial instruments

Where derivatives are traded on an exchange, the fair value is based on prices from the exchange. The fair value of over-the-counter derivative financial instruments is estimated based on standard market discounting and valuation methodologies which use reliable observable inputs including yield curves and market rates. These methodologies are implemented by the Finance function and validated by the Risk function within AIB. Where there is uncertainty around the inputs to a derivatives' valuation model, the fair value is estimated using inputs which provide the Bank's view of the most likely outcome in a disposal transaction between willing counterparties in a functioning market. Where an unobservable input is material to the outcome of the valuation, a range of potential outcomes from favourable to unfavourable is estimated.

Counterparty credit and own credit is an input into the valuation of uncollateralised customer derivatives.

Financial instruments not measured at fair value but with fair value information presented separately in the notes to the financial statements

#### Loans and advances to banks

The fair value of loans and advances to banks is estimated using discounted cash flows applying either market rates, where practicably available, or rates currently offered by other financial institutions for placements with similar characteristics.

#### Loans and advances to customers

The Bank provides lending facilities of varying rates and maturities to personal customers. Valuation techniques are used in estimating the fair value of loans, primarily using discounted cash flows and applying market rates where practicable.

The fair value of variable rate mortgage products including tracker mortgages is calculated by discounting expected cash flows using discount rates that reflect the interest rate risk in the portfolio. For fixed rate mortgages, the fair value is calculated by discounting expected cash flows using discount rates that reflect the interest rate risk in that portfolio. For the overall loan portfolio, an adjustment is made for credit risk which at 31 December 2022 took account of the Bank's expectations on credit losses over the life of the loans.

### Deposits by banks

The fair value of current accounts and deposit liabilities which are repayable on demand, or which re-price frequently, approximates to their book value. The fair value of all other deposits and other borrowings is estimated using discounted cash flows applying either market rates, where applicable, or interest rates currently offered by the Bank.

### Debt securities in issue

The estimated fair value of subordinated liabilities and other capital instruments, and debt securities in issue, is based on quoted prices where available, or where these are unavailable, are estimated using valuation techniques using observable market data for similar instruments. Where there is no market data for a directly comparable instrument, management judgement, on an appropriate credit spread to similar or related instruments with market data available, is used within the valuation technique. This is supported by cross referencing other similar or related instruments.

### Other financial assets and other financial liabilities

This caption includes accrued interest receivable and payable and the carrying amount is considered representative of fair value.



## 28. FAIR VALUE OF FINANCIAL INSTRUMENTS

The following table sets out the carrying value of financial instruments across the three levels of the fair value hierarchy at 31 December 2022 and 2021:

					2022
	Carrying amount		Fair val	ue	
	_	Fair va	alue hierarchy	,	
		Level 1	Level 2	Level 3	Total
	€m	€m	€m	€m	€m
Financial assets measured at fair value					
Derivative financial instruments					
Interest rate swaps	742	_	742	_	742
Investment debt securities at FVOCI:					
Euro bank securities	_	_	_	_	_
Equity investments at FVOCI	_	_	_	_	_
Equity investments at FVTPL	_	_	_	_	_
	742	_	742	_	742
Financial assets not measured at fair					
value					
Cash and balances at central banks	_	_	_	_	_
Cash and cash equivalents	_	_	_	_	_
Items in the course of collection	_	_	_	_	_
Loans and advances to banks	50	_	_	50	50
Loans and advances to customers	17,746	_	_	16,936	16,936
Amounts due from Group undertakings	_	_	_	_	_
Other financial assets	26	_	_	26	26
	17,822			17,012	17,012
Financial liabilities measured at fair value					
Derivative financial instruments					
Interest rate swaps	_	_	_	_	_
		_	_	_	_
Financial liabilities not measured at fair value					
Deposits by banks	8,578	_	_	8,578	8,578
Debt securities in issue	8,274	8,092	_	_	8,092
Subordinated liabilities	300	_	187	_	187
Other financial liabilities	22	_	_	22	22
	17,174	8,092	187	8,600	16,879



## 28. FAIR VALUE OF FINANCIAL INSTRUMENTS

_					2021
	Carrying amount		Fair val	ue	
	_	Fair	value hierarchy		
	_	Level 1	Level 2	Level 3	Total
	€m	€m	€m	€m	€m
Financial assets measured at fair value					
Derivative financial instruments					
Interest rate swaps	75	_	75	_	75
	75	_	75	_	75
Financial assets not measured at fair value					
Loans and advances to banks	83	_	_	83	83
Loans and advances to customers	16,936	_	_	16,121	16,121
Other financial assets	202	_	_	202	202
_	17,221	_	_	16,406	16,406
Financial liabilities not measured at fair value					
Deposits by banks	6,047		_	6,047	6,047
Debt securities in issue	9,525	9,804	_	_	9,804
Subordinated liabilities	300	_	202	_	202
Other financial liabilities	19	<u> </u>	<u> </u>	19	19
	15,891	9,804	202	6,066	16,072

### Significant transfers between Level 1, Level 2 and Level 3 of the fair value hierarchy

There were no transfers between Level 1, Level 2 and Level 3 of the fair value hierarchy for the years ended 31 December 2022 and 2021.

### 29. STATEMENT OF CASH FLOWS

For the purposes of the statement of cash flows, cash and cash equivalents comprise the following:

	2022	2021
	€m	€m
Loans and advances to banks (note 14)	50	83
	50	83

Cash and cash equivalents include balances with original maturities of less than 3 months. Restricted cash in the Bank is included in note 14. Loans and advances to banks.



### **30. RELATED PARTY TRANSACTIONS**

### (a) Transactions with AIB

The Bank is a subsidiary of AIB. Banking transactions are entered into between the Bank and AIB in the normal course of business. These include loans, deposits and derivatives on an arm's length basis. Interest paid to AIB and interest received from AIB is disclosed in note 3 and note 4 to the financial statements. Most of the Bank's activities are outsourced to AIB under an Outsourcing and Agency Agreement. AIB as Service Agent for the Bank, originates residential mortgage loans through its retail branch network and digital channels in the Republic of Ireland, services the mortgage loans and provides treasury services in connection with financing as well as a range of support services. The Bank's activities are financed through the issuance of mortgage covered securities with the balance of funding being provided by AIB. In addition, the Bank has a pricing agreement with AIB updated in 2020 to reflect revised OECD guidelines on transfer pricing, which are the internationally accepted principles in this area, and which take account of the functions, risks and assets involved (see note 9: Operating expenses).

	2022	2021
	€m	€m
Included in the statement of financial position		
Loans and advances to banks	_	63
Deposits by banks	(8,578)	(6,047)
Accruals and deferred income	(9)	(1)
Subordinated liabilities	(300)	(300)
Derivative financial instruments		
Interest rate swaps		
Assets (Fair value)	742	75
Included in the income statement		
Interest income	33	39
Interest expense	(149)	(62)
Net trading income	688	48
Operating expenses	(961)	(394)

### (b) IAS 24 Related Party Disclosures

The following disclosures are made in accordance with the provisions of IAS 24 Related Party Disclosures. Under IAS 24, Key Management Personnel ('KMP') are defined as comprising Executive, Non-Executive Directors and Senior Executive Officers. As at 31 December 2022 the Bank has 8 KMP (2021: 7 KMP).

## (i) Compensation of Key Management Personnel ('KMP')

Compensation of KMP, namely Executive and Non-Executive Directors and Senior Executive Officers, in office during the year is paid by AIB and allocated to the Bank under the Outsourcing and Agency Agreement.

Total compensation to KMP is as follows:

	2022	2021
	€'000	€'000
Short-term compensation*	89	93
Post-employment benefits	_	_
Termination benefits	_	
	89	93

<sup>\*</sup>Non-Executive Directors short-term compensation: comprises Directors' fees and travel and subsistence expenses incurred in the performance of the duties of their office, which are paid by AIB.

The figures shown include the figures separately reported in respect of Directors' remuneration in note 9 Operating expenses.



### **30. RELATED PARTY TRANSACTIONS**

### (b) IAS 24 Related Party Disclosures (continued)

(ii) Transactions with Key Management Personnel ('KMP')

Loans to KMP and their close family members are made in the ordinary course of business on substantially the same terms, including interest rates and collateral, as those prevailing at the time for comparable transactions with other persons of similar standing not connected with the Bank, and do not involve more than the normal risk of collectability or present other unfavourable features. Loans to Executive Directors and Senior Executive Officers are made on terms available to other employees in the Bank generally, in accordance with established policy, within limits set on a case by case basis.

The aggregate amounts outstanding, in respect of all loans, quasi loans and credit transactions between the Bank and the KMP, as defined above, together with members of their close families and entities influenced by them are shown in the following table:

	2022	2021
Loans outstanding	€'000	€'000
At 1 January	154	188
Loan repayments during the year/change of KMP/other	167	(34)
At 31 December	321	154

The balances outlined above include loans, quasi loans and credit transactions held by the connected persons of KMP identified as such during the reporting period.

### (c) Companies Act 2014 disclosures

(i) Loans to Directors

The following information is presented in accordance with the Companies Act 2014. For the purposes of the Companies Act disclosures, Director means the Board of Directors and any past Directors who are Directors during the relevant period. There were 8 Directors in office during the year, 2 of whom availed of credit facilities (2021: 1). The Directors who availed of credit facilities had balances outstanding at 31 December 2022 (2021: 1).

Details of transactions with Directors for the year ended 31 December 2022 are as follows:

	Balance at 31 December 2021	Amounts advanced during 2022	Amounts repaid during 2022	Balance at 31 December 2022
	€'000	€'000	€'000	€'000
Chris Curley				
Loans	154	_	(27)	127
Interest charged during the year	_	_	_	4
Maximum debit balance during the year*	<del>-</del>	_	_	154

<sup>\*</sup>The maximum debit balance is calculated by aggregating the maximum debit balance drawn on each facility during the year.

	Balance at 31 December 2021	Amounts advanced during 2022	Amounts repaid during 2022	Balance at 31 December 2022
	€'000	€'000	€'000	€'000
Eamonn Quinn				
Loans <sup>(1)</sup>	215	_	(21)	194
Interest charged during the year	_	_	_	3
Maximum debit balance during the year*		_	_	215

<sup>(1)</sup> Eamonn Quinn drew down the loan in 2006 under the Bank's standard terms as offered to customers at that time and has performed in accordance with those terms

An ECL allowance is recognised for all loans and advances. Accordingly, an insignificant ECL is held on the above facilities at 31 December 2022. All facilities are performing to their terms and conditions.

Gerry Gaffney, Yvonne Hill, Conor McGrath, James Murphy and Paul Owens had no facilities with the Bank during 2022.

<sup>\*</sup>The maximum debit balance is calculated by aggregating the maximum debit balance drawn on each facility during the year.



### **30. RELATED PARTY TRANSACTIONS**

### c) Companies Act 2014 disclosures

(i) Loans to Directors (continued)

	Balance at 31 December 2020	Amounts advanced during 2021	Amounts repaid during 2021	Balance at 31 December 2021
	€'000	€'000	€'000	€'000
Chris Curley				
Loans	188	_	(34)	154
Interest charged during the year	_		_	5
Maximum debit balance during the year*	_		_	188

<sup>\*</sup>The maximum debit balance is calculated by aggregating the maximum debit balance drawn on each facility during the year.

An ECL allowance is recognised for all loans and advances. Accordingly, an insignificant ECL is held on the above facilities at 31 December 2021. All facilities are performing to their terms and conditions.

Conor McGrath, Gerry Gaffney, Yvonne Hill, James Murphy and Paul Owens had no facilities with the Bank during 2021.

### (ii) Connected persons

The aggregate of loans to connected persons of Directors, in office during the year, at 31 December 2022, as defined in Section 220 of the Companies Act 2014, are as follows (aggregate of 2 persons; 2021: 2 persons)

	Balance at 31 December 2022	Balance at 31 December 2021
	€'000	€'000
Loan	55	326
Interest charged during the year	5	5
Maximum debit balance during year*	400	362

<sup>\*\*</sup>The maximum debit balance is calculated by aggregating the maximum debit balance drawn on each facility during the year.

An ECL allowance is recognised for all loans and advances. Accordingly, an insignificant ECL is held on the above facilities at 31 December 2022. All facilities are performing to their terms and conditions.

## (iii) Aggregate balance of loans and guarantees held by Directors and their connected persons

The aggregate balance of loans and guarantees held by Directors and their connected persons as at 31 December 2022 represents less than 0.03% of the net assets of the Bank. (2021: 0.04%).

## (d) Summary of relationship with the Irish Government

The Irish Government is recognised as a related party under IAS 24 Related Party Disclosures as it is in a position to exercise control over AIB Group. The relationship between the AIB Group and the Government is governed by a Relationship Framework which is available on the Group's website at www.aib.ie/investorrelations.

### **Ordinary Shares**

At 31 December 2022, the State held 56.89% of the ordinary shares of AIB Group plc (31 December 2021: 71.12%). The reduction was following a directed buyback and disposals as part of a pre-arranged trading plan.

Subsequent to the year end, the State's shareholding reduced to 55.93% as at 3 February 2023.



### **31. SEGMENTAL INFORMATION**

The Bank's income and assets are entirely attributable to mortgage lending activity in the Republic of Ireland.

### **32. ULTIMATE PARENT COMPANY**

The Bank is a wholly owned subsidiary of AIB. The ultimate parent company of the Bank is AIB Group plc., a company registered in the Republic of Ireland.

The ultimate parent company is the largest group of which the Bank is a member, for which consolidated accounts are prepared. The financial statements of AIB and AIB Group plc are available from its registered address at AIB Group plc, 10 Molesworth Street, Dublin 2. Alternatively, information can be viewed by accessing AIB's website at <a href="https://www.aib.ie/investorrelations">www.aib.ie/investorrelations</a>.

### 33. NON-ADJUSTING EVENTS AFTER THE REPORTING DATE

There have been no significant events affecting the Bank since the reporting date which require disclosure or amendment to the financial statements.

### 34. APPROVAL OF FINANCIAL STATEMENTS

The financial statements were approved by the Board of Directors on 6 March 2023.