



Goldman Sachs Bank Europe SE

# Pillar 3 Disclosures

For the period ended December 31, 2023

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## Introduction

### Overview

Goldman Sachs Bank Europe SE (GSBE or the bank) is engaged in a wide range of activities primarily in the E.U., including underwriting and market making in debt and equity securities and derivatives, asset and wealth management services, deposit-taking, lending (including securities lending), advisory service and transaction banking services. The bank is a primary dealer for government bonds issued by E.U. sovereigns. The bank serves a diversified client base that includes corporations, financial institutions, governments, and individuals, from its registered office in Frankfurt am Main and branches in Amsterdam, Athens, Copenhagen, Dublin, London, Luxembourg, Madrid, Milan, Paris, Stockholm, and Warsaw. The bank is registered with the commercial register number HRB 114190 at the local district court in Frankfurt am Main, Germany.

The bank is directly supervised by the European Central Bank (ECB) and additionally by the Federal Financial Supervisory Authority (BaFin) and the Deutsche Bundesbank in the context of the E.U. Single Supervisory Mechanism.

The bank is a wholly owned subsidiary of Goldman Sachs Bank USA (GS Bank USA), a New York State chartered bank and a member of the Federal Reserve System (FRB). The bank's ultimate parent undertaking and controlling entity is The Goldman Sachs Group, Inc. (Group Inc. or the firm). Group Inc. is a bank holding company and a financial holding company regulated by the Board of Governors of the FRB. In relation to the bank, "group undertaking" means Group Inc. or any of its subsidiaries. Group Inc., together with its consolidated subsidiaries form "GS Group" (also referred to as the firm). GS Group is a leading global financial institution that delivers a broad range of financial services to a large and diversified client base that includes corporations, financial institutions, governments, and individuals.

The bank seeks to be the advisor of choice for its clients and a leading participant in financial markets. As part of GS Group, the bank also enters into transactions with affiliates in the normal course of business as part of its market-making activities and general operations.

The bank generates revenues from the following business activities: Investment Banking; Fixed Income, Currency, and Commodities (FICC); Equities; and Investment Management, which includes Asset management and Wealth management.

During the year, the bank agreed to transfer the majority of its asset management activities to Goldman Sachs Asset Management BV (GSAM BV), GS Group's primary E.U. asset management entity, consistent with GS Group's resolution planning and commercial objectives of its asset management business.

The bank strives to maintain a work environment that fosters professionalism, excellence, diversity, cooperation among employees and high standards of business ethics. The bank recognises that it needs the most talented people to deliver outstanding results for clients. A diverse workforce in terms of gender, ethnicity, sexual orientation, background, culture and education ensures the development of better ideas, products and services. For further information about Goldman Sachs' people, culture and commitment to diversity, see

[www.goldmansachs.com/our-commitments/diversity-and-inclusion/](http://www.goldmansachs.com/our-commitments/diversity-and-inclusion/)

GSBE's regulatory capital requirement has been calculated in accordance with the E.U. Capital Requirements Directive (CRD) and the E.U. Capital Requirements Regulation (CRR). These are largely based on the Basel Committee on Banking Supervision's (Basel Committee) final capital framework for strengthening international capital standards (Basel III), which is structured around three pillars: Pillar 1 "minimum capital requirements", Pillar 2 "supervisory review process" and Pillar 3 "market discipline".

The term "CRR" in this document refers to the applicable version of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012; as amended by Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 (known as CRR2) as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements.

GSBE's Pillar 3 disclosures for December 31, 2023 have been prepared in accordance with the EBA Guidelines on disclosure requirements under Part Eight of the CRR.

All references to December 2023 and December 2022 refer to the dates as the context requires, December 31, 2023 and

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December 31, 2022, respectively. Any reference to a future year refers to a year ending on December 31 of that year. Any statements relating to future periods are subject to a high degree of uncertainty.

Information on GSBE's 2023 Quarterly Pillar 3 disclosures, 2023 Annual Pillar 3 disclosures, IFRS Financial Information and Financial Statements can be accessed via the following links:

<https://www.goldmansachs.com/disclosures/gsbank-europe-se-disclosures.html>

<https://www.goldmansachs.com/investor-relations/financials/subsidiary-financial-info/gsbe/index.html>

For information on Group Inc.'s financial statements and regulatory capital ratios, please refer to the firm's Pillar 3 Disclosures and Annual Report on Form 10-K. References to the "2023 Form 10-K" are to the firm's Annual Report on Form 10-K for the year ended December 31, 2023. All references to December 2023 refer to the period ended, or the date, as the context requires, December 31, 2023.

<https://www.goldmansachs.com/investor-relations/financials/other-information/2023/4q-pillar3-2023.pdf>

<https://www.goldmansachs.com/investor-relations/financials/10k/2023/2023-10-k.pdf>

Measures of exposures and other metrics disclosed in this report may not be based on International Financial Reporting Standards (IFRS), may not be directly comparable to measures reported in the IFRS Financial Information, and may not be comparable to similar measures used by other companies.

The capital requirements are expressed as risk-based capital and leverage ratios that compare measures of regulatory capital to risk-weighted assets (RWAs), assets and off-balance-sheet exposures. Failure to comply with these capital requirements could result in restrictions being imposed by GSBE's regulators and could limit the bank's ability to pay dividends and make certain discretionary compensation payments. GSBE's capital levels are also subject to qualitative judgements by our regulators about components of capital, risk weightings and other factors.

**Basis of Consolidation**

GSBE and its subsidiaries are directly and indirectly wholly

owned by the immediate parent company, GS Bank USA and the ultimate parent company, Group Inc. respectively and included in their respective consolidated financial statements.

Due to immateriality of its subsidiaries pursuant to Section 296 (2) of HGB, GSBE waives its obligation from preparing consolidated financial statements.

The subsidiaries are:

- Goldman, Sachs & Co. Verwaltungs GmbH
- Goldman Sachs Gives gemeinnützige GmbH
- Goldman Sachs Management GP GmbH

The additional information to be disclosed in accordance with Section 26(a) of the German Banking Act (Kreditwesengesetz; in the following, "KWG") was also included in GSBE's 2023 Financial Statements under the section of "Branches of the Bank" within Note 24.

GSBE is considered the parent company of a group under § 10a of KWG. Its subsidiary Goldman Sachs Management GP GmbH, Frankfurt am Main, a financial corporation according to § 1 Abs 3 KWG, may in line with Article 19 CRR be exempted from the scope of consolidation so that, in accordance with Article 11 of CRR, there is no requirement for a regulatory consolidation, and the rules on disclosure obligations on a consolidated basis under Article 13 do not apply. Therefore, these disclosures are prepared for GSBE on a stand-alone basis.

**Restrictions on the Transfer of Funds or Regulatory Capital within the Firm**

Group Inc. is a holding company and, therefore, utilises dividends, distributions, and other payments from its subsidiaries to fund dividend payments and other payments on its obligations, including debt obligations. Regulatory capital requirements, as well as other provisions of applicable law and regulations restrict Group Inc.'s and GS Bank USA's ability to withdraw capital from its regulated subsidiaries. Capital is considered transferable between GSBE and its subsidiaries without any significant restriction except to the extent it is required for regulatory purposes. Any transfer of funds between GSBE and its subsidiaries is expected to be immaterial and therefore the bank does not elaborate on this further.

For information regarding the capital adequacy of GSBE, see "Risk Report - Capital Adequacy" within "Management Report" of GSBE's 2023 Financial Statements.

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For further information about restrictions on the transfer of funds within Group Inc. and its subsidiaries, see “Note 20. Regulation and Capital Adequacy” in Part II, Item 8 “Financial Statements and Supplementary Data” and “Risk Management - Liquidity Risk Management” and “Equity Capital Management and Regulatory Capital” in Part II, Item 7 “Management’s Discussion and Analysis of Financial Condition and Results of Operations” in the firm’s 2023 Form 10-K.

**Definition of Risk-Weighted Assets**

The risk weights used in the calculation of RWAs reflect an assessment of the riskiness of our assets and exposures. These risk weights are based on predetermined levels set by regulators. The relationship between available capital and capital requirements can be expressed in the form of a ratio, and capital requirements are arrived at by dividing RWAs by 12.5.

**Fair Value**

Financial assets that are not held for the collection of contractual cash flows or do not have cash flows that represent solely payments of principal and interest are mandatorily measured at fair value through profit or loss. Financial assets mandatorily measured at fair value are initially measured at fair value with transaction costs expensed in the income statement. Such financial assets are subsequently measured at fair value with gains or losses recognised in gains or losses from financial instruments at fair value through profit or loss.

Financial liabilities held for trading are initially measured at fair value and subsequently at fair value through profit or loss, with gains or losses recognised in gains or losses from financial instruments at fair value through profit or loss. The bank also designates certain financial liabilities at fair value through profit or loss. Financial liabilities designated at fair value through profit or loss are initially measured at fair value and subsequently at fair value through profit or loss, with Debt Valuation Adjustment (DVA) being recognised in other comprehensive income, if it does not create or enlarge an accounting mismatch, and the remaining changes in the fair value being recognised in net revenues. Amounts recognised in other comprehensive income attributable to own credit spreads are not subsequently transferred to the income statement, even upon derecognition of the financial liability. Gains or losses exclude contractual interest, which is included in interest income and interest expense, for all instruments other than hybrid financial instruments. The primary reasons for designating such financial liabilities at fair value through

profit or loss are:

- To eliminate or significantly reduce a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases; and
- The group of financial liabilities, or financial assets and liabilities, is managed and its performance evaluated on a fair value basis.

For additional information regarding the fair value measurement of GSBE’s assets and liabilities, see “Note 2. Summary of Significant Accounting Policies. Financial Assets and Liabilities Measured at Fair Value Through Profit or Loss” in GSBE’s IFRS Financial Information.

**Banking Book / Trading Book Classification**

The bank has a comprehensive framework of policies, controls and reporting to meet the requirements of the CRR for inclusion of positions in the banking book and trading book. In order to determine the appropriate regulatory capital treatment for our exposures, positions must first be classified into either “banking book” or “trading book”. Positions are classified as banking book unless they qualify to be classified as trading book.

Trading book positions generally meet the following criteria: they are assets or liabilities that are accounted for at fair value; they are risk managed using a Value-at-Risk (VaR) internal model; they are held as part of our market-making and underwriting businesses and are intended to be resold in the short term, or positions intended to benefit from actual or expected short-term price differences between buying and selling prices or from other price or interest rate variations (as defined in point (85) of Article 4(1) in CRR). Trading book positions are subject to market risk regulatory capital requirements, as are foreign exchange and commodity positions, whether or not they meet the other criteria for classification as trading book positions. Market risk is the risk of loss in value of these positions due to changes in market conditions. Some trading book positions, such as derivatives, are also subject to counterparty credit risk regulatory capital requirements.

Banking book positions are accounted for in line with the principles outlined in the bank’s Financial Statements. Banking book positions are subject to credit risk regulatory capital requirements. Credit risk represents the potential for loss due to the default or deterioration in credit quality of a counterparty (e.g., an Over-The-Counter (OTC) derivatives

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counterparty or a borrower) or an issuer of securities or other instruments the bank holds.

**Regulatory Developments**

The bank's businesses are subject to extensive regulation and supervision worldwide. New regulations have been adopted or are being considered by regulators and policymakers. Given that many of the new and proposed rules are highly complex, the full impact of regulatory reform will not be known until the rules are implemented and market practices develop under final E.U. regulations.

**Risk-Based Capital Ratios**

In June 2023, the European Union reached a deal on a proposed legislative package to amend the CRR and CRD to finalise the implementation of Basel III standards. The package introduces the "output floor" and includes changes to rules on credit, market, operational risk and credit valuation adjustment risk, with a proposed implementation date of January 1, 2025, for substantial parts of the reforms. The "output floor" represents one of the key measures of Basel reforms. It sets a lower bound to the capital requirements that are produced by firm's internal models at 72.5% of the own funds requirements that would apply on the basis of standardised approaches at the end of the transitional period.

The firm continues to evaluate the impact of these proposed rules as they are finalised by E.U. regulators.

**Minimum Requirements for Own Funds and Eligible Liabilities (MREL)**

The CRR and the Bank Recovery and Resolution Directive (BRRD) are designed to, among other things, implement the Financial Stability Board's (FSB) minimum Total Loss Absorbing Capacity (TLAC) requirement for global systemically important bank (G-SIB). The CRR requires material subsidiaries of non-E.U. G-SIBs to meet internal TLAC (iTLAC) requirements equivalent to 90% of the external TLAC requirement applicable to E.U. G-SIBs. The bank satisfies this requirement through its regulatory capital and MREL eligible debt from intercompany borrowings.

The BRRD, as amended by BRRD II, subjects institutions to a minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board's (SRB) internal MREL (iMREL) requirements applicable to the bank are phasing in through to January 1, 2024. The SRB has set this at 22% (excluding the combined buffer requirement), which is at

a higher level than the iTLAC to RWAs requirement. As of December 2023, the bank was in compliance with its forthcoming iMREL requirements. The minimum iMREL requirement is subject to change by the SRB annually.

**Swaps, Derivatives and Commodities Regulation.** The bank is a swap dealer registered with the Commodity Futures Trading Commission and a registered security-based swap dealer with the U.S. Securities Exchange Commissions. As of both December 2023 and December 2022 the bank was subject to and in compliance with applicable capital requirements for swap dealers and security-based swap dealers.

**Business Outlook**

The bank's Executive Board continues to be cautiously optimistic about the business outlook for 2024. The Executive Board expects net revenues under IFRS in 2024 to be higher and net income under IFRS in 2024 to be essentially unchanged compared to the year ended December 2023.

The bank's Executive Board expects that the total capital ratio will decrease compared to December 2023 primarily driven by an expected increase in business activity. The expected total capital ratio will remain conservatively above minimum requirements.

The business outlook is based on the current expectations of the bank's Executive Board and the actual results could differ, possibly materially, to the anticipated results due to certain factors including those described in "Risk Report —Principal Risks and Uncertainties".

**Business Environment**

In 2023, the global economy grew, but was impacted throughout the year by broad macroeconomic and geopolitical concerns. Concerns about persistent inflation and the economic outlook were somewhat eased by improvement in inflationary measures over the course of the year and increased expectations for a soft landing for the U.S. economy amid a slowdown in the pace of monetary policy tightening, both contributing to improved market sentiment. During the early part of the year, momentum was temporarily disrupted by stress in the banking sector, which led to the failure of certain regional banks in the U.S. and the combination of Switzerland's two largest financial institutions, resulting in a period of high interest rate volatility before concerns subsided after regional banks showed stability. Geopolitical stresses that carried over into 2023, including the conflict in Ukraine and ongoing tensions with China, remained elevated. Additionally,



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the renewed onset of conflict in the Middle East added to the uncertainty of global stability. The above factors contributed to higher global equity prices compared with the end of 2022 and pressure in the commercial real estate market.

There remains uncertainty and concerns about geopolitical risks, global central bank policy, inflation, the commercial real estate sector, and potential increases in regulatory capital requirements.

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**Attestation**

To the best of our knowledge, we attest that the Pillar 3 Disclosures of Goldman Sachs Bank Europe SE for the period ended December 31, 2023, prepared according to Part Eight of the CRR, have been prepared in accordance with the formal policies and internal processes, systems and controls agreed upon at the management body level.

Michael Holmes  
Chief Financial Officer  
Goldman Sachs Bank Europe SE

Robert Charnley  
Executive Board Member responsible for Risk  
Goldman Sachs Bank Europe SE

## Risk Management

### Overview

The bank believes that effective risk management is critical to its success. Accordingly, the bank has established an enterprise risk management framework that employs a comprehensive, integrated approach to risk management, and is designed to enable comprehensive risk management processes through which the risks associated with the bank's business are identified, assessed, monitored and managed.

These risks include liquidity, market, credit, operational, cybersecurity, climate, model, legal, compliance, conduct, regulatory, business environment and strategic risks, and reputational risks. The following section covers the bank's risk management structure which is consistent with GS Bank USA and GS Group and built around three core components: governance, processes and people.

### Governance

Risk management governance starts with the bank's Executive Board, which both directly and through established committees, including the GSBE Risk Committee, oversees the risk management policies and practices. The GSBE Executive Board is also responsible for the annual review and approval of the GSBE Risk Appetite Statement (RAS). The RAS describes the levels and types of risk the bank is willing to assume within its risk capacity to achieve its strategic business objectives included in the bank's business plan, while remaining in compliance with regulatory requirements. The Executive Board approves the business plan and is ultimately responsible for overseeing and setting strategy and risk appetite. For more details on the GSBE RAS refer to the 'Risk Profile and Strategy'.

Enterprise Risk at firmwide level and Regulatory Engagement at entity-level oversees the implementation of the firm's and the bank's risk governance structure and core risk management processes respectively and is responsible for ensuring that the enterprise risk management framework provides senior management and relevant governing bodies, including the GSBE Executive Board and Risk Committee, with a consistent and integrated approach to managing the various risks in a manner consistent with the firm's and the bank's risk appetite.

The bank's revenue-producing units that directly report to the respective Executive Board members, as well as Engineering, Human Capital Management, Operations, and Corporate and

Workplace Solutions that directly report to the bank's Chief Operating Officer (COO) and Corporate Treasury that directly reports to the bank's Chief Financial Officer (CFO), are considered the first line of defence. They are accountable for the outcomes of the risk-generating activities, as well as for assessing and managing those risks within the bank's risk appetite.

The bank's independent risk oversight and control functions are considered the second line of defence and provide independent assessment, oversight and challenge of the risks taken by the first line of defence, as well as lead and participate in risk-oriented committees. Independent risk oversight and control functions include Compliance that reports to the bank's Chief Administrative Officer (CAO) and Tax and Controllers that reports to the bank's CFO; Credit Risk, Liquidity Risk, Market Risk, Model Risk Management, Operational Risk, Enterprise Risk, Regulatory Engagement, and Risk Engineering that report to the bank's Chief Risk Officer (CRO); and Legal that reports to the bank's Chief Executive Officer (CEO).

Internal Audit is considered the third line of defence and reports to the bank's Executive Board. Internal Audit includes professionals with a broad range of audit and industry experience, including risk management expertise. Internal Audit is responsible for independently assessing and validating the effectiveness of key controls, including those within the risk management framework, and providing timely reporting to the bank's senior management, Executive and Supervisory Boards and regulators.

The three lines of defence structure promotes the accountability of first line risk takers, provides a framework for effective challenge by the second line and empowers independent review from the third line.

Consistent with the firm, the bank maintains strong and proactive communication about risk and it has a culture of collaboration in decision-making among the first and second lines of defence, committees and senior management. While the first line of defence is responsible for management of their risk, the bank dedicates extensive resources to the second line of defence in order to ensure a strong oversight structure and an appropriate segregation of duties. The firm regularly reinforces its strong culture of escalation and accountability across all functions.

Additional oversight is provided by the GSBE Supervisory

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Board including its committees which receives regular updates from the GSBE Executive Board on the bank's risk profile and other risk related matters.

**Processes**

The bank maintains various processes that are critical components of its risk management framework, including (i) risk identification and control assessment, (ii) risk appetite, limits, thresholds and alerts setting, (iii) risk metrics, reporting and monitoring, and (iv) risk decision making.

The bank has a comprehensive data collection process, including bank-wide policies and procedures that require all employees to report and escalate risk events. The bank's approach to risk identification and assessment is comprehensive across all risk types, is dynamic and forward-looking to reflect and adapt to the bank's changing risk profile and business environment, leverages subject matter expertise, and allows for prioritisation of the bank's most critical risks.

To effectively assess and monitor risks, the bank maintains a daily discipline of marking substantially all of its inventory to current market levels. The bank does so because of its belief that this discipline is one of the most effective tools for assessing and managing risk and that it provides transparent and realistic insight into its inventory exposures. The bank also applies a comprehensive framework of limits, thresholds and alerts to control and monitor risk across transactions, products, businesses and markets. See "Credit Risk", "Market Risk" and "Liquidity Risk Management", "Operational Risk", "Model Risk", and "Climate Risk" for further information.

An important part of the bank's risk management process is stress testing. It allows the bank to quantify its exposure to tail risks, highlight potential loss concentrations, undertake risk/reward analysis, and assess and mitigate its risk positions. Stress tests are performed on a regular basis and are designed to ensure a comprehensive analysis of the bank's vulnerabilities, and idiosyncratic risks combining financial and non-financial risks, including, but not limited to, credit, market, liquidity and funding, operational and compliance, strategic, systemic and emerging risks. Ad hoc stress tests are also performed in anticipation of market events or conditions. Stress testing is also used to assess capital and liquidity adequacy as part of the bank's capital and liquidity planning processes.

The bank's risk reporting and monitoring processes are designed to take into account information about both existing

and emerging risks, thereby enabling the bank's risk committees and senior management to perform their responsibilities with the appropriate level of insight into risk exposures. Furthermore, the bank's limit and threshold breach processes provide means for timely escalation. The bank evaluates changes in its risk profile and businesses, including changes in business mix and jurisdictions in which it operates, by monitoring risk factors at an entity level.

**People**

Even the best technology serves only as a tool for helping to make informed decisions in real time about the risks GSBE is taking. Ultimately, effective risk management requires people to interpret risk data on an ongoing and timely basis and adjust risk positions accordingly. The experience of the bank's and the firm's professionals, and their understanding of the nuances and limitations of each risk measure, guides the bank in assessing exposures and maintaining them within prudent levels.

Consistent with GS Group, the bank reinforces a culture of effective risk management, consistent with its risk appetite, in its training and development programmes, as well as in the way it evaluates performance, recognises and rewards people. The firm's training and development programmes, including certain sessions led by the most senior leaders, are focused on the importance of risk management, client relationships and reputational excellence. As part of the firm's annual performance review process, the firm assesses reputational excellence, including how an employee exercises good risk management and reputational judgement, and adheres to the firm's code of conduct and compliance policies. The firm's review and reward processes are designed to communicate and reinforce to its professionals the link between behaviour and how people are recognised, the need to focus on clients and reputation, and the need to always act in accordance with the highest standards of the firm.

**Structure**

The bank has a two-tier board structure consisting of the Supervisory Board and the Executive Board.

**Supervisory Board.**

The Supervisory Board supervises and advises the Executive Board and performs specific statutory tasks. The Supervisory Board is supported and advised by the Supervisory Board Audit Committee, Supervisory Board Risk Committee, Supervisory Board Remuneration Committee and Supervisory Board Nomination Committee in fulfilling their

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duties and responsibilities. The key committees with regard to risk management are described below.

**Supervisory Board Audit Committee.** The Audit Committee of the Supervisory Board is responsible for providing advice to the Supervisory Board and assisting the Supervisory Board by overseeing (i) the integrity of the bank's financial statements and financial reporting processes; (ii) management's processes for ensuring the appropriateness and effectiveness of systems and controls; (iii) the process in relation to the appointment, re-appointment or replacement of the bank's external auditor; and (iv) safeguarding the independence and integrity of the bank's compliance and internal audit functions.

**Supervisory Board Risk Committee.** The Risk Committee of the Supervisory Board is responsible for providing advice to the Supervisory Board on the bank's current and future risk appetite and assisting the Supervisory Board in overseeing the implementation of that risk appetite and strategy by the Executive Board.

**Executive Board.**

The Executive Board has ultimate responsibility for all activities in the bank, including oversight of risk, both directly and through delegation to various committees. A series of committees within the bank with specific risk management mandates covering important aspects of the bank's businesses also have oversight or decision-making responsibilities. The key committees and bodies with oversight of the bank's activities are described below.

**GSBE Risk Committee.** The GSBE Risk Committee is responsible for the ongoing monitoring and control of all financial and non-financial risks associated with the bank's activities. This includes reviewing key financial and risk metrics, including but not limited to profit and loss, capital (including the Internal Capital Adequacy Assessment Process (ICAAP)), funding, liquidity (including the Internal Liquidity Adequacy Assessment Process (ILAAP)), credit risk, market risk, operational risk, model risk, price verification and stress tests. Within its mandate, the GSBE Risk Committee approves market risk, credit risk and liquidity risk limits as well as operational risk, model risk and climate risk thresholds or articulates recommendations with regard to risk limits and thresholds which require Executive Board approval. Its membership includes senior managers from the revenue-producing divisions and independent risk oversight and control functions. The GSBE Risk Committee reports to the bank's Executive Board.

**GSBE Operational Risk and Resilience Committee.** The GSBE Operational Risk and Resilience Committee provides oversight of the ongoing development and implementation of operational risk policies, framework, and methodologies, with oversight from the GSBE Risk Committee, and monitors the effectiveness of operational risk and resilience management. The Committee is accountable for the implementation of business standards and practices, including reputational risk management, client service and conduct risk, within the scope of its mission. The GSBE Operational Risk and Resilience Committee reports to the GSBE Risk Committee.

**GSBE Credit Risk Council.** The GSBE Credit Risk Council is responsible for (i) ensuring that the bank has appropriate and effective credit risk management processes, and (ii) ongoing monitoring and review of credit risk exposure. The Council reports to the bank's Risk Committee.

**GSBE Asset Liability Committee.** The GSBE Asset and Liability Committee (ALCO) reviews and approves the strategic direction for the bank's financial resources including capital, liquidity, funding and balance sheet. The committee has oversight responsibility for asset liability management, including interest rate and currency risk, funds transfer pricing, capital allocation and incentives, and credit ratings. The committee makes recommendations as to any adjustments to asset liability management and financial resource allocation in light of current events, risks, exposures, and regulatory requirements and approves related policies. Its membership includes senior managers from the revenue-producing divisions and independent risk oversight and control functions. The GSBE Asset-Liability Committee reports to the bank's Executive Board.

**Regional, GS Bank USA and GS Group Risk Governance.** As an indirect wholly-owned subsidiary and integrated part of GS Group, the comprehensive regional and global risk governance framework in place forms an important part of the strategy and risk management process of the bank. The integration into the firmwide risk management framework allows the bank to use the GS Group's methods and systems and a consistent implementation of firmwide structures and principles while considering the entity specificities and governance structure. In addition, as a direct wholly-owned subsidiary of GS Bank USA, the bank's risk management processes are embedded in the oversight provided by relevant governance bodies of GS Bank USA.

GS Group has established a series of committees with specific risk management mandates. Committees with

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oversight of matters relevant to the bank include representation from bank's senior management, where relevant. For more information regarding GS Group and regional risk and oversight committees which have also oversight of matters relevant for GSBE, see "Risk Report - Overview and Structure of Risk Management" within "Management Report" of GSBE's 2023 Financial Statements.

**Risk Profile and Strategy**

In the normal course of activities in serving clients, the bank commits capital, engages in derivative and lending transactions, and otherwise incurs risk as an inherent part of its business. However, the bank endeavours not to undertake risk in form or amount that could potentially and materially impair its capital and liquidity position or the ability to generate revenues, even in a stressed environment. Where possible it employs mitigants and hedges, such as collateral, netting arrangements and other controls, in order to manage such risks and risk concentrations within the risk appetite levels.

The bank's overall risk appetite is established through an assessment of opportunities relative to potential losses, and is calibrated to, among others, GSBE's capital, liquidity and earnings capability, and reflective of its strategy. The primary means of evaluating risk-taking capacity is through the ICAAP. The bank's ICAAP is a comprehensive internal process which coherently integrates several key components including risk identification and materiality assessment, capital planning, and risk appetite, and is integrated into the broader risk management framework and decision making throughout the entity.

The Risk Appetite Statement (RAS) of GSBE is complemented by the GS Bank USA RAS and GS Group RAS, and articulates the risk philosophy, the identification of risks generated by its business activities, as well as the appetite, limits, thresholds and alerts set in order to manage effectively those risks. Consistent with this objective, the bank pays particular attention to evaluating risks that are concentrated, correlated, illiquid, or have other adverse characteristics. The intention is to mitigate or eliminate these risks, limiting them to such an extent that they could not, individually or collectively, materially and adversely affect GSBE. The bank regularly reviews risk exposure and risk appetite, and takes into consideration the key external stakeholders, in particular our clients, shareholders, creditors, rating agencies, and regulators. The long-term success of our business model is directly linked to the preservation of strong

relationships with each of these key constituents.

The GSBE Executive Board, in coordination with the GSBE CRO and the GSBE Risk Committee and with further supervision from the GSBE Supervisory Board, is actively engaged in reviewing and approving our overall risk appetite, as well as in reviewing the risk profile.

The consideration of risk appetite and the underlying risk management framework ensures that GSBE's businesses are congruent with its strategy under both normal and stressed environments. The bank believes that the risk management framework and the associated risk policies, procedures and systems in place are comprehensive and effective with regard to our profile and strategy. The framework is evaluated on an ongoing basis and subject to independent internal audit assessments to ensure our risk management arrangements remain effective.

**Risk Measurement**

On a day-to-day basis, risk measurement plays an important role in articulating the risk appetite of the firm and GSBE and in managing the risk profile as expressed in the RAS. Risk may be monitored against bank, firmwide, product, divisional or business level limits or thresholds, or against a combination of such attributes. The bank measures risk using a suite of metrics, as relevant to each type of risk, including stress metrics to calculate the potential loss from a wide range of scenarios and sensitivity analysis. These risks are tracked systematically, and they are monitored and reported to the relevant committees and Board on a regular basis.

A number of specialist committees and governance bodies sit within the broader risk management framework with responsibilities for the monitoring of specific risks against risk limits or thresholds and the escalation of any breaches as described above.

GSBE is fully integrated into the broader firmwide organisational structure and risk governance and applies a risk philosophy and risk management principles consistent with GS Group. For an overview of the GS Group risk management framework, including governance, processes and committee structure, see "Risk Management – Overview and Structure of Risk Management" in Part II, Item 7 "Management's Discussion and Analysis of Financial Condition and Results of Operations" in the firm's 2023 Form 10-K.

### **Adequacy of Risk Management Arrangements**

GSBE is satisfied that the risk management arrangements and systems, as described above, are appropriate given the strategy and risk profile of the bank. These elements are reviewed at least annually and, where appropriate, updated to reflect best practice, evolving market conditions and changing regulatory requirements.

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## Key Metrics

The table below provides an overview of the bank's prudential regulatory position as measured by key regulatory metrics as of December 2023 and previously reported reference periods. December 2023 and December 2022, in the table below and throughout the disclosure, includes the impact of including the respective year's audited profits, unless otherwise stated.

Table 1: EU KM1 - Key Metrics Table

<i>€ in millions</i>		a. As of December 2023	b. As of June 2023	c. As of December 2022	d. As of June 2022	e. As of March 2022
<b>Available own funds (amounts)</b>						
1	Common Equity Tier 1 (CET1) capital	€ 12,872	€ 12,178	€ 8,911	€ 8,448	€ 8,457
2	Tier 1 capital	€ 12,872	€ 12,178	€ 8,911	€ 8,448	€ 8,457
3	Total capital	€ 12,892	€ 12,198	€ 8,931	€ 8,468	€ 8,477
<b>Risk-weighted exposure amounts</b>						
4	Total risk-weighted exposure amount	€ 36,045	€ 31,721	€ 28,179	€ 26,932	€ 27,688
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>						
5	Common Equity Tier 1 ratio (%)	35.7%	38.4%	31.6%	31.4%	30.5%
6	Tier 1 ratio (%)	35.7%	38.4%	31.6%	31.4%	30.5%
7	Total capital ratio (%)	35.8%	38.5%	31.7%	31.4%	30.6%
<b>Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)</b>						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3.0%	3.0%	3.0%	3.0%	3.0%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.7%	1.7%	1.7%	1.7%	1.7%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.3%	2.3%	2.3%	2.3%	2.3%
EU 7d	Total SREP own funds requirements (%)	11.0%	11.0%	11.0%	11.0%	11.0%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>						
8	Capital conservation buffer (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.0%	0.0%	0.0%	0.0%	0.0%
9	Institution specific countercyclical capital buffer (%)	0.8%	0.7%	0.3%	0.0%	0.1%
EU 9a	Systemic risk buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
10	Global Systemically Important Institution buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 10a	Other Systemically Important Institution buffer	0.5%	0.5%	0.3%	0.3%	0.3%
11	Combined buffer requirement (%)	3.8%	3.7%	3.0%	2.8%	2.8%
EU 11a	Overall capital requirements (%)	14.8%	14.7%	14.0%	13.8%	13.8%
12	CET1 available after meeting the total SREP own funds requirements (%)	24.8%	27.5%	20.7%	20.4%	19.6%
<b>Leverage ratio</b>						
13	Leverage ratio total exposure measure	€ 112,901	€ 102,987	€ 84,006	€ 102,621	€ 73,668
14	Leverage ratio %	11.4%	11.8%	10.6%	8.2%	11.5%
<b>Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)</b>						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14c	Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>						
EU 14d	Total SREP leverage ratio requirements (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14e	Overall leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
<b>Liquidity Coverage Ratio</b>						
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	€ 19,903	€ 20,331	€ 19,623	€ 17,085	€ 14,599
EU 16a	Cash outflows - Total weighted value	€ 22,363	€ 24,306	€ 21,340	€ 15,459	€ 13,423
EU 16b	Cash inflows - Total weighted value	€ 9,773	€ 10,283	€ 10,165	€ 8,182	€ 7,258



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16	Total net cash outflows (adjusted value)	€ 12,591	€ 14,023	€ 11,176	€ 7,277	€ 6,166
17	Liquidity coverage ratio (%)	161.0%	145.0%	189.0%	241.0%	234.0%
<b>Net Stable Funding Ratio</b>						
18	Total available stable funding	€ 28,185	€ 23,586	€ 18,997	€ 23,381	€ 19,964
19	Total required stable funding	€ 21,171	€ 17,356	€ 12,335	€ 17,151	€ 13,954
20	NSFR ratio (%)	133.1%	135.9%	154.0%	136.3%	143.1%

## Notes:

1. The capital ratios and leverage ratio as of December 2023 includes 2023 retained earnings that contributed approximately 113 basis points and 63 basis points to the CET1 ratio and leverage ratio, respectively.
2. The total capital ratio decreased by 2.7 percentage points (pp) vs. June 2023 to 35.8% mainly driven by increased RWAs of €4.3bn to €36.0bn. The increase in RWAs resulted from increased operational RWAs by €0.9bn, increased credit and counterparty credit RWAs by €1.9bn and increased market RWAs by €1.5bn. The increase in RWA was partially offset by €0.7bn of 2023 retained earnings.
3. The leverage ratio decreased by 0.4pp vs. June 2023 to 11.4% mainly driven by an increase in leverage exposures by €9.9bn to €112.9bn, primarily due to an increase in off balance sheet exposures within commitments and an increase in on-balance sheet exposures within cash inventory, partially offset by €0.7bn of 2023 retained earnings.
4. The Liquidity coverage ratio increased by 16pp vs. June 2023 to 161%, mainly due to a decrease in the net cash outflow by €1.4bn to €12.6bn, mainly due to a decrease in other contractual funding obligations partially offset by a decrease in HQLA by €0.4bn to €19.9bn.
5. The Net stable funding ratio decreased by 2.8pp vs. June 2023 to 133.1%, due to an increase in Required Stable Funding by €3.8bn to €21.2bn, mainly driven by inventory. This was partially offset by an increase in Available Stable Funding by €4.6bn to €28.2bn, due to an increase in the intercompany loan.

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## EU iLAC

In accordance with the requirements of Article 92b of Regulation (EU) No 575/2013, the following table shows GSBE's minimum requirement for eligible liabilities, as a material subsidiary of a non-EU headquartered G-SII.

**Table 2: EU iLAC: Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs**

€ in millions		As of December 2023		
		a	b	c
		Minimum requirement for own funds and eligible liabilities (internal MREL)	Non-EU G-SII Requirement for own funds and eligible liabilities (internal TLAC)	Qualitative information
<b>Applicable requirement and level of application</b>				
EU 1	Is the entity subject to a Non-EU G-SII Requirement for own funds and eligible liabilities? (Y/N)			Y
EU 2	If EU 1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			I
EU 2a	Is the entity subject to an internal MREL requirement? (Y/N)			N
EU 2b	If EU 2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			N/A
<b>Own funds and eligible liabilities</b>				
EU 3	Common Equity Tier 1 capital (CET1)	€ 12,872	€ 12,872	
EU 4	Eligible Additional Tier 1 instruments	-	-	
EU 5	Eligible Tier 2 instruments	20	20	
EU 6	Eligible own funds	€ 12,892	€ 12,892	
EU 7	Eligible liabilities	800	800	
EU 8	Of which permitted guarantees	-		
EU 9a	(Adjustments)	-		
EU 9b	Own funds and eligible liabilities items after adjustments	€ 13,692	€ 13,692	
<b>Total risk exposure amount and total exposure measure</b>				
EU 10	Total risk exposure amount	€ 36,045	€ 36,045	
EU 11	Total exposure measure	€ 112,901	€ 112,901	
<b>Ratio of own funds and eligible liabilities</b>				
EU 12	Own funds and eligible liabilities (as a percentage of TREA)	38.0%	38.0%	
EU 13	>>> of which permitted guarantees	0.0%		
EU 14	Own funds and eligible liabilities (as a percentage of leverage exposure)	12.1%	12.1%	
EU 15	>>> of which permitted guarantees	0.0%		
EU 16	CET1 (as a percentage of TREA) available after meeting the entity's requirements	19.0%	19.0%	
EU 17	Institution-specific combined buffer requirement *		3.8%	
<b>Requirements</b>				
EU 18	Requirement expressed as a percentage of the total risk exposure amount	N/A	16.2%	
EU 19	>>> of which may be met with guarantees	N/A		
EU 20	Internal MREL expressed as percentage of the total exposure measure	N/A	6.1%	
EU 21	>>> of which may be met with guarantees	N/A		
<b>Memorandum items</b>				
EU 22	Total amount of excluded liabilities referred to in Article 72a(2) CRR **		€ 242,870	

\* Row EU 17 requires reporting Institution-specific combined buffer requirement, but EBA template mapping refers to cell M 03.00, r0540, c0020 (O-SII requirement). GSBE is reporting the Institution-specific combined buffer requirement in this row.

\*\* Row EU 22 requires reporting Total amount of excluded liabilities referred to in Article 72a(2) CRR, but EBA template mapping refers to cell M 03.00, r0590, c0020 (Other bailinable liabilities with residual maturity of >= 1 year and < 2 years). GSBE is reporting Total amount of excluded liabilities in this row.

## Notes:

The own funds and eligible liabilities as a percentage of TREA (EU 12) increased from September 2023 by 0.1pp to 38.0% mainly driven by an increase in capital of €0.7bn due to inclusion of 2023 retained earnings partially offset by an increase in RWAs of €1.7bn to €36.0bn. The increase in RWAs was driven by an increase in operational RWAs of €0.9bn, increased credit and counterparty credit RWAs by €1.1bn and decreased market RWAs by €0.2bn.

The own funds and eligible liabilities as a percentage of leverage exposure (EU 14) increased from September 2023 by 1.2pp to 12.1% mainly driven by leverage exposures decreasing by €6.6bn to €112.9bn, primarily due to a decrease in on balance sheet

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exposures within securities financing, other assets and cash and cash equivalents, partially offset by an increase in off balance sheet exposures within forward starting securities financing commitments.

As noted in the Regulatory developments section above, the SRB has set the minimum iMREL to RWAs requirement at 22% (excluding the combined buffer requirement), which is at a higher level than the iTLAC to RWAs requirement. As iMREL requirements become applicable to the bank from January 01, 2024, the table above (EU 16a) reflects adherence to the iTLAC requirements (EU 16b). As of December 2023, the bank was in compliance with its forthcoming iMREL requirements.

## EU TLAC2a

**Table 3: EU TLAC2a: Creditor ranking - Entity that is not a resolution entity**

€ in millions		Insolvency Ranking								As of December 2023
		1	1	2	2	3	4	n	n	Sum of 1 to n
		(Most junior)	(Most junior)					(Most senior)	(Most senior)	
		Resolution Entity	Other	Resolution Entity	Other	Resolution Entity	Other	Resolution Entity	Other	
<b>1</b>	<b>Empty set in the EU</b>									
<b>2</b>	Description of insolvency rank (free text)		Common equity Tier 1 instruments			Tier 2 Instruments		Claims subordinated by virtue of a contractual subordination clause not specifying the pertinent rank (other than Additional Tier 1 or Tier2 Instruments)		
<b>3</b>	Liabilities and own funds including derivative liabilities		€ 12,872			€ 20		€ 800		€ 13,692
<b>4</b>	o/w excluded liabilities		0			0		0		0
<b>5</b>	Liabilities and own funds less excluded liabilities		12,872			20		€ 800		13,692
<b>6</b>	Subset of liabilities and own funds less excluded liabilities that are own funds and eligible liabilities for the purpose of [choose as appropriate: internal TLAC/internal MREL]		12,872			20		800		13,692
<b>7</b>	o/w residual maturity ≥ 1 year < 2 years		0			0		0		0
<b>8</b>	o/w residual maturity ≥ 2 year < 5 years		0			0		0		0
<b>9</b>	o/w residual maturity ≥ 5 years < 10 years		0			0		800		800
<b>10</b>	o/w residual maturity ≥ 10 years, but excluding perpetual securities		0			0		0		0
<b>11</b>	o/w perpetual securities		€ 12,872			€ 20		€ 0		€ 12,892

## Capital Framework

### Capital Structure

For regulatory capital purposes, a bank's total available capital has the following components:

- Common Equity Tier 1 capital (CET1), which is comprised of common shareholders' equity, after giving effect to deductions for disallowed items and other adjustments.
- Tier 1 capital which is comprised of CET1 capital and other qualifying capital instruments; and
- Tier 2 capital which is comprised of long-term qualifying subordinated debt and preference shares.

Certain components of GSBE's regulatory capital are subject to regulatory limits and restrictions under the rules. In general, to qualify as Tier 1 or Tier 2 capital, an instrument must be fully paid and unsecured. A qualifying Tier 1 or Tier 2 capital instrument must also be subordinated to all senior indebtedness of the organisation.

Under the rules, the minimum CET1, Tier 1 capital and Total capital ratio requirements (collectively the Pillar 1 capital requirements) are supplemented by:

- A capital conservation buffer of 2.5%, consisting entirely of capital that qualifies as CET1.
- A countercyclical capital buffer of up to 2.5% (consisting entirely of CET1) in order to counteract excessive credit growth. The buffer only applies to GSBE's exposures to certain types of counterparties and exposures based in jurisdictions which have announced and implemented a countercyclical buffer. As of December 2023, the GSBE specific countercyclical capital buffer rate increases the minimum CET1 ratio by 0.84% driven by countercyclical buffer rates across certain jurisdictions where the bank has exposures.
- In addition to the existing capital requirement resulting from Pillar 1, GSBE is subject to an annual Supervisory Review and Evaluation Process (SREP) by its regulators. As a result of this SREP process the supervisory authorities determine a SREP capital add-on. The SREP capital add-on is determined by the SREP process conducted by the ECB. This capital add-on consists of two components: a Pillar 2 Capital Requirement (P2R) and a Pillar 2 Capital Guidance (P2G). While the P2R is

binding and breaches can have direct legal consequences for banks, the P2G signals to banks the supervisory view of the adequate level of capital to be maintained to provide a sufficient buffer to withstand stressed situations. Unlike the P2R, the P2G is not legally binding.

GSBE's P2R capital add-on has been set by the ECB to 3.0% of which 1.69% has to be held in CET1 capital. The SREP ratios in table 1 incorporate P2R received from the ECB and excludes the P2G. Effective January 1, 2024, GSBE's P2R capital add-on has been reduced by 25bps to 2.75%.

- An additional capital requirement according to the degree of systemic importance of the bank (O-SII buffer). The CRD and CRR provide that institutions that are systemically important at the E.U. or member state level, known as other systemically important institutions (OSIIs), may be subject to O-SII buffers. BaFin identified the bank as an O-SII in Germany from January 1, 2022. As of December 2023, the O-SII buffer has been set to 50 basis points. Effective January 1, 2024, the O-SII buffer has been set to 75 basis points.

### Minimum Regulatory Capital Ratios

The following table presents GSBE's minimum required ratios as of December 2023.

**Table 4: Minimum Regulatory Capital Ratios**

<i>€ in millions</i>	<b>As of December 2023</b>
	<b>Minimum ratio</b>
CET1 ratio	10.0%
Tier 1 capital ratio	12.1%
Total capital ratio	14.8%

The ratios in the above table incorporate P2R received from the ECB and excludes the P2G, which represents the ECB's view of the capital that bank would require to absorb losses in stressed market conditions.

### Compliance with Capital Requirements

As of December 2023, GSBE had capital levels in excess of its overall capital requirements (OCR) which include the pillar 1 capital requirement, pillar 2 capital requirement, capital conservation buffer, countercyclical capital buffer and O-SII buffer.

## Regulatory Capital

### Overview

The following table presents a breakdown of GSBE's capital ratios under CRR as of December 2023.

**Table 5: Regulatory Capital Ratios**

<i>€ in millions</i>	<b>As of December 2023</b>
CET1 Capital	€ 12,872
Tier 1 Capital	€ 12,872
Tier 2 Capital	€ 20
<b>Total Capital</b>	<b>€ 12,892</b>
<b>RWAs</b>	<b>€ 36,045</b>
<b>CET1 Ratio</b>	<b>35.7%</b>
<b>Tier 1 Capital Ratio</b>	<b>35.7%</b>
<b>Total Capital Ratio</b>	<b>35.8%</b>

All capital, RWAs and ratios are based on current interpretation, expectations and understanding of the rules and may evolve in the future.

The following table contains information on the components of our regulatory capital structure. The capital resources are based on GSBE's 2023 IFRS Financial Information.

**Table 6: Regulatory Capital**

<i>€ in millions</i>	<b>As of December 2023</b>
Ordinary Share Capital and related share premium accounts	€ 355
Audited Retained Earnings	2,051
Other capital reserves	10,576
Accumulated Other Comprehensive Income	2
<b>CET1 Capital Before Deductions</b>	<b>€ 12,984</b>
CVA and DVA	(3)
Prudent Valuation Adjustments	(77)
Intangible Assets	(32)
<b>CET1 Capital After Deductions</b>	<b>€ 12,872</b>
<b>Additional Tier 1 capital</b>	<b>-</b>
<b>Tier 1 Capital After Deductions</b>	<b>€ 12,872</b>
<b>Tier 2 Capital Before Deductions</b>	<b>€ 20</b>
<b>Tier 2 Capital After Deductions</b>	<b>€ 20</b>
<b>Total Capital Resources</b>	<b>€ 12,892</b>

GSBE's total capital resources increased by €4.0bn during 2023 primarily driven by a capital injection of €3.3bn into free capital reserves in Q1 2023 and €0.7bn of 2023 retained earnings.

On March 31, 2023, the ECB published the results of its asset quality review of the bank, following which, on March 8,

2024, the ECB issued a decision requiring the bank to temporarily deduct €131 million from its CET1 capital until

certain findings were addressed. The deduction was implemented from the date of the decision, and would have reduced the CET1 capital ratio by 36bps as of December 2023.

We set out below a reconciliation between the capital resources of GSBE and its balance sheet as per GSBE IFRS Financial Information.

**Table 7: Reconciliation to Balance Sheet**

<i>€ in millions</i>	<b>As of December 2023</b>
Total Shareholders' Equity	€ 12,984
Regulatory Adjustments	(112)
Tier 2 Capital	20
<b>Total Capital Resources</b>	<b>€ 12,892</b>

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## Risk-Weighted Assets

RWAs are calculated based on measures of credit risk, market risk and operational risk. The table below presents a summary of the RWAs and capital requirements by type as at December 2023 and December 2022.

Table 8: EU OV1 - Overview of RWAs

€ in millions					
		Related table reference	Total risk exposure amounts (TREA)		Total own funds requirements
			a	b	c
			December 2023	December 2022	December 2023
1	<b>Credit risk (excluding CCR)</b>		€ 6,190	€ 5,627	€ 495
2	Of which the standardised approach	See EU CR4	6,190	5,627	495
3	Of which the foundation IRB (FIRB) approach		-	-	-
4	Of which: slotting approach		-	-	-
EU 4a	Of which equity IRB under the simple risk-weighted approach		-	-	-
5	Of which the Advanced IRB (A-IRB) approach		-	-	-
6	<b>Counterparty credit risk - CCR</b>		€ 15,953	€ 13,357	€ 1,276
7	Of which the standardised approach	See EU CCR1	804	514	64
8	Of which internal model method (IMM)	See EU CCR1	11,647	9,437	932
EU 8a	Of which exposures to a CCP	See EU CCR8	125	137	10
EU 8b	Of which credit valuation adjustment - CVA	See EU CCR2	2,713	2,658	217
9	Of which other CCR	See EU CCR1	664	612	53
15	<b>Settlement risk</b>		€ 92	€ 503	€ 7
16	<b>Securitisation exposures in the banking book (after the cap)</b>		€ 79	€ 110	€ 7
17	Of which SEC-IRBA approach		-	-	-
18	Of which SEC-ERBA (including IAA)	See EU SEC3	-	-	-
19	Of which SEC-SA approach	See EU SEC3	79	110	7
EU 19a	Of which 1250%		-	-	-
20	<b>Position, foreign exchange and commodities risks (Market risk)</b>		€ 10,739	€ 6,480	€ 859
21	Of which the standardised approach	See EU MR1	164	954	13
22	Of which IMA	See EU MR2-A	10,575	5,525	846
EU 22a	<b>Large exposures</b>		-	-	-
23	<b>Operational risk</b>		€ 2,992	€ 2,102	€ 239
EU 23a	Of which basic indicator approach	See EU OR1	2,992	2,102	239
EU 23b	Of which standardised approach		-	-	-
EU 23c	Of which advanced measurement approach		-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight)		249	246	20
29	<b>Total</b>		€ 36,045	€ 28,179	€ 2,883

\*EBA mapping rows from 10 to 14 and from 25 to 28 are described as "Not Applicable" and hence not shown in the table above

For RWA drivers, please refer to respective section references provided in the table above.

## Credit Risk

### Overview

Credit risk represents the potential for loss due to the default or deterioration in credit quality of a counterparty (e.g. an OTC derivatives counterparty or a borrower) or an issuer of securities or other instruments the bank holds. The bank further differentiates between trading counterparty risk, lending risk, deposit placement risk and settlement risk within its risk management approach.

The bank's exposure to credit risk comes mostly from cash placed with banks, client transactions in OTC derivatives and loans and lending commitments. Credit risk also comes from securities financing transactions (i.e. resale and repurchase agreements and securities borrowing and lending activities) and customer and other receivables. In addition, the bank may hold other positions that give rise to credit risk (e.g., bonds held in trading book) — these credit risks are captured as a component of market risk measures, which are monitored and managed by Market Risk, consistent with other inventory positions.

Credit Risk which is independent of the revenue-producing units and reports to the bank's CRO, has primary responsibility for assessing, monitoring and managing the bank's credit risk through oversight across the bank's businesses.

The bank's framework for managing credit risk is consistent with the framework of GS Group established by GS Group's Firmwide Risk Appetite Committee, with the bank's Credit Risk function being an integral part of the GS Group Credit Risk function which reports to GS Group's CRO.

The bank's credit risk strategy during the year ended December 2023 aimed to maintain a high credit quality standard, to mitigate credit exposure as appropriate through the use of collateral or other forms of risk mitigation, and to avoid excessive concentration risks. The majority of counterparties which give risk to credit risk are expected to be of investment-grade quality.

### Credit Risk Management Process

The process for managing credit risk includes the critical components of the bank's risk management framework described in the "Overview and Structure of Risk Management" within "Management Report" of GSBE's 2023 Financial Statements. as well as the following:

- Setting of credit limits and monitoring compliance with established credit risk limits;
- Regular reporting (daily, weekly, monthly, quarterly) on the bank's credit exposures and credit concentrations to the bank's CCO, CRO, GSBE Credit Risk Council, GSBE Risk Committee, and the Executive Board of the bank;
- Assessing and determining internal credit ratings for counterparties and the associated likelihood that a counterparty will default on its payment obligations;
- Measuring our current and potential credit exposure and losses resulting from a counterparty default;
- Using credit risk mitigants, including netting, collateral, surety, sub participations and hedging; and
- Maximizing recovery through active workout and restructuring of claims.

The bank performs credit analyses, which incorporate initial and ongoing evaluations of the capacity and willingness of a counterparty to meet its financial obligations. The bank employs well-defined underwriting standards and policies, which seek to mitigate credit risk through analysis of a borrower's credit history, financial information, cash flow, sustainability of liquidity and collateral quality adequacy, if applicable. For substantially all of the bank's credit exposures, the core of the process is an annual counterparty credit evaluation or more frequently if deemed necessary as a result of events or changes in circumstances. The bank determines an internal credit rating for the counterparty by considering the results of the credit evaluations and assumptions with respect to the nature of and outlook for the counterparty's industry and the economic environment. The internal credit rating does not take into consideration collateral received or other credit support arrangements. Senior personnel, with expertise in specific industries, inspect and approve credit reviews and internal credit ratings.

The bank's risk assessment may also include, where applicable, reviewing certain key metrics, including, but not limited to, delinquency status, collateral values and other risk factors.

The credit risk management systems capture credit exposure to individual counterparties and on an aggregate basis to counterparties and their subsidiaries. These systems also provide management with comprehensive information about



**Pillar 3 Disclosures**

aggregate credit risk by product, internal credit rating, industry and country.

**Risk Measures**

Credit risk is measured based on the potential loss in the event of non-payment by a counterparty using current and potential exposure. For loans and lending commitments, the primary measure is a function of the notional amount of the position. For derivatives and securities financing transactions, current exposure represents the amount presently owed to the bank after taking into account applicable netting and collateral arrangements, while potential exposure represents the bank's estimate of the future exposure that could arise over the life of a transaction. Potential exposure is calculated using internal models calibrated based on market movements within a specified confidence level (usually at the 95th-percentile). Potential exposure also takes into account netting and collateral arrangements. In addition, complementary metrics are used to identify concentrations, most notably 'Shortfall' defined as residual unsecured loss following an extreme market stress including portfolio liquidation after the application of any collateral held.

**Limits**

Credit limits and thresholds are used at various levels (e.g. counterparty, economic group, industry and country, climate high risk sector, shadow banking) as well as underwriting standards to manage the size and nature of the bank's credit exposures. The bank's Executive Board and the GSBE Risk Committee approve credit risk limits at the bank-wide level, and where appropriate the business and product level, consistent with the bank's risk appetite. Furthermore, the Executive Board or GSBE Risk Committee (and the GSBE Credit Risk Council) approves the framework that governs the setting of credit risk sub-limits at the bank level, which is delegated to Credit Risk. The counterparty limits are assigned based on multiple factors mainly internal credit rating, size of counterparty and tenor profile of the credit exposure.

Credit Risk is responsible for monitoring these limits and identifying and escalating to senior management and/or the appropriate risk committee, on a timely basis, instances where limits have been exceeded.

**Credit Exposures**

For information on the bank's credit exposures, including the gross fair value, netting benefits and current exposure of the bank's derivative exposures and the bank's securities

financing transactions, see "Note 5. Repurchase Agreements" and "Note 6. Trading Assets and Liabilities" and "Credit Risk Management" in "Management Report" in GSBE's 2023 Financial Statements.

**Credit Risk and Counterparty Credit Risk RWAs**

Credit RWAs are calculated based on measures of credit exposure, which are then risk weighted. Below is a description of the methodology used to calculate RWAs for wholesale exposures, which generally include credit exposures to corporates, institutions, sovereigns or government entities (other than securitisation, retail or equity exposures). GSBE does not have regulatory permission to compute risk weights in accordance with the Advanced Internal Ratings Based (AIRB) approach, which utilises internal assessments of each counterparty's creditworthiness. Instead, it uses Standardised Risk Weights for which nominated External Credit Assessment Institutions (ECAI) ratings are used.

**Exposure at Default (EAD).** The exposure amount that is risk weighted for regulatory capital calculations. For on-balance-sheet assets, such as receivables and cash, EAD is generally based on the balance sheet value. For the calculation of EAD for off-balance-sheet exposures, including commitments and guarantees, an equivalent exposure amount is calculated based on the notional amount of each transaction multiplied by a credit conversion factor in accordance with Article 166 of CRR.

For the measurement of substantially all counterparty credit exposure on OTC, cleared and listed derivative and securities financing transactions, GSBE was granted permission to use the Internal Model Method (IMM). GSBE applied the IMM for purposes of its regulatory capital calculation throughout the reporting period. The models estimate Expected Exposures (EE) at various points in the future using risk factor simulations. The model parameters are derived from historical and implied market data using the most recent three-year period as well as a stressed three-year period. The models also estimate the Effective Expected Positive Exposure (EEPE) over the first year of the portfolio, which is the time-weighted average of non-declining positive credit exposure over the EE simulation. EAD is calculated by multiplying the EEPE by a standard regulatory factor which was set to 1.45.

The EAD detailed in the following tables represents the exposures used in computing capital requirements and is not a directly comparable metric to balance sheet amounts

**Pillar 3 Disclosures**

presented in the IFRS Financial Information of GSBE for the year ended December 31, 2023 due to differences in measurement methodology, counterparty netting and collateral offsets used.

As GSBE calculates the majority of its counterparty credit exposure under the IMM, the impacts of netting and collateral are integral to the calculation of the exposure. The exposures disclosed below are presented on a net and collateralised basis where there is a legally enforceable netting and collateral opinion. They do not include the effect of any credit protection purchased on counterparties.

**Governance and Validation of Risk Parameters**

Approaches and methodologies for quantifying EAD are monitored and managed by the Risk Engineering department within the Risk Division. Models are independently reviewed, validated, and approved by Model Risk Management. For further information, see “Model Risk”. The performance of each IMM model used to quantify EAD is assessed quarterly via backtesting procedures, performed by comparing the predicted and realised exposure of a set of representative trades and portfolios at certain horizons. The bank’s models are monitored and enhanced in response to backtesting.

**External Credit Rating Assessment Institutions.** The External Credit Assessment Institutions (ECAIs) used are Standard & Poor’s Ratings Services (S&P), Moody’s Investors Service (Moody’s) and Fitch, Inc. (Fitch) for all types of exposure categories in accordance with Articles 135 and 444 of CRR.

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The following table present the methods used to calculate Counterparty Credit Risk RWAs and main parameters used within each method for GSBE as of December 2023.

**Table 9: EU CCR1 - Analysis of CCR Exposure by Approach**

€ in millions		As of December 2023							
		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWA
EU1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-	-	1.4	-	-	-	-
1	SA-CCR (for derivatives)	€ 323	€ 868		1.4	€ 1,713	€ 1,713	€ 1,713	€ 804
2	IMM (for derivatives and SFTs)			11,478	1.45	85,097	16,644	16,644	11,647
2a	Of which securities financing transactions netting sets			2,157		64,128	3,128	3,128	2,349
2b	Of which derivatives and long settlement transactions netting sets			9,321		20,969	13,516	13,516	9,298
2c	Of which from contractual cross-product netting sets			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					5,811	877	877	664
5	VaR for SFTs					-	-	-	-
6	<b>Total</b>					-	-	-	€ 13,115

Total Counterparty Credit Risk (CCR) RWA increased by €2.6bn over the course of 2023 mainly due to increased securities financing transactions exposure primarily from fixed income funding (+€1.8bn) and increased listed derivatives (+€0.5bn)

The following table presents GSBE's exposures subject to CVA capital charges and corresponding RWEAs as of December 2023.

**Table 10: EU CCR2 - Transactions subject to own funds requirements for CVA risk**

€ in millions		As of December 2023	
		Exposure value	RWEAs
1	Total transactions subject to the Advanced method	€ 7,489	€ 1,945
2	(i) VaR component (including the 3x multiplier)		349
3	(ii) Stressed VaR component (including the 3x multiplier)		1,596
4	Transactions subject to the Standardised method	1,279	768
5	<b>Total transactions subject to own funds requirements for CVA risk</b>	<b>€ 8,768</b>	<b>€ 2,713</b>

The following table presents annual flow statement of the RWEAs and capital requirements under the IMM as of December 2023.

**Table 11: EU CCR7 - RWEA Flow Statements of CCR Exposures under the IMM**

€ in millions		As of December 2023
		RWEA
1	<b>RWEAs as at the end of the previous reporting period (Dec 2022)</b>	<b>€ 9,476</b>
2	Asset size	454
3	Credit quality of counterparties	(7)
4	Model updates (IMM only)	681
5	Methodology and policy (IMM only)	964
6	Acquisitions and disposals	-
7	Foreign exchange movements	51
8	Other	28
9	<b>RWEAs as at the end of the current reporting period (Dec 2023)</b>	<b>€ 11,647</b>

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Other category in row 8 mainly includes the impact on RWEA due to change in risk weight category and change in maturity. The following table presents GSBE's EAD after credit risk mitigation and RWEAs on exposures to CCPs as of December 2023.

**Table 12: EU CCR8 - Exposures to CCPs**

<i>€ in millions</i>		<b>As of December 2023</b>	
		<b>Exposure value</b>	<b>RWEA</b>
<b>1</b>	<b>Exposures to QCCPs (total)</b>		<b>€ 125</b>
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	562	11
3	(i) OTC derivatives	354	7
4	(ii) Exchange-traded derivatives	208	4
5	(iii) SFTs	0	0
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	-	-
8	Non-segregated initial margin	1,430	29
9	Prefunded default fund contributions	399	85
<b>11</b>	<b>Exposures to non-QCCPs (total)</b>		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	-
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

## Credit Risk Mitigation

To reduce the bank's credit exposures on loans and lending commitments, depending on the credit quality of the borrower and other characteristics of the transaction, the bank employs a variety of potential risk mitigants. Risk mitigants include collateral provisions, guarantees, covenants, structural seniority of the bank loan claims and, for certain lending commitments, provisions in the legal documentation that allow the bank to adjust loan amounts, pricing, structure and other terms as market conditions change. The type and structure of risk mitigants employed can significantly influence the degree of credit risk involved in a loan or lending commitment.

For derivatives and securities financing transactions, the bank may enter into netting agreements with counterparties that permit it to offset receivables and payables with such counterparties. The bank may also reduce credit risk with counterparties by entering into agreements that enable it to obtain collateral from them on an upfront or contingent basis and/or to terminate transactions if the counterparty's credit rating falls below a specified level. An enforceable credit support agreement grants the non-defaulting party exercising termination provisions the right to liquidate collateral and apply the proceeds to any amounts owed. In order to assess enforceability of our right to setoff under netting and credit support agreements, GSBE evaluates various factors, including applicable bankruptcy laws, local statutes and regulatory provisions in the jurisdiction of the parties to the agreement. The collateral held by GSBE consists primarily of cash and securities of high-quality government bonds (mainly E.U. and U.S.), subject to haircuts as deemed appropriate by the Credit Risk function. Credit Risk performs ongoing collateral monitoring to ensure the firm maintains an appropriate quality and level of diversification of collateral.

The bank's collateral is managed by certain functions within the firm which review exposure calculations, make margin calls with relevant counterparties, and ensure subsequent settlement of collateral movements. The bank monitors the fair value of the collateral on a daily basis to ensure our credit exposures are appropriately collateralised.

As of December 2023, the aggregate amounts of additional collateral or termination payments related to the bank's net derivative liabilities under bilateral agreements that could have been called by our counterparties in the event of a one- and two-notch downgrade of our credit ratings are immaterial.

When the bank does not have sufficient visibility into a counterparty's financial strength or when it believes a counterparty requires support, the bank may obtain third-party guarantees of the counterparty's obligations. The bank may also mitigate its credit risk using credit derivatives or loan sub-participation agreements. As of December 2023, €0.1bn CDS hedges qualified as credit risk mitigants with hedge provider being Goldman Sachs International.

## Pillar 3 Disclosures

The following table presents GSBE's net carrying amount secured by different CRM techniques as of December 2023.

**Table 13: EU CR3 – CRM Techniques: Disclosure of the use of credit risk mitigation techniques**

<i>€ in millions</i>		<b>As of December 2023</b>				
		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees		Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	€ 36,177	€ 16,656	€ 16,448	€ 207	-
2	Debt securities	-	-	-	-	-
<b>3</b>	<b>Total</b>	<b>€ 36,177</b>	<b>€ 16,656</b>	<b>€ 16,448</b>	<b>€ 207</b>	<b>-</b>
4	<i>Of which non-performing exposures</i>	71	38	19	19	-
EU-5	<i>Of which defaulted</i>	71	38			

### Credit Derivatives

GSBE enters into credit derivative transactions primarily to facilitate client activity and to manage the credit risk associated with market-making.

GSBE may also use credit derivatives to hedge credit risk exposures associated with financing and lending activities as well as counterparty credit risk exposures resulting from derivatives activity. Some of these hedges may qualify as eligible credit risk mitigation under Part III, Title II, Chapter

4 of the CRR, allowing the firm to recognise the protection via risk weight substitution. Where the aggregate notional of credit derivatives hedging exposure to a loan obligor is less than the notional loan exposure, the substitution approach is only employed for the percentage of loan exposure covered by eligible credit derivatives.

For further information on the Credit Risk management process please refer to the “Credit Risk Management” within “Management Report” of GSBE’s 2023 Financial Statements.

The following table presents GSBE’s exposure to credit derivatives based on notional and fair values as of December 2023.

**Table 14: EU CCR6 – Credit Derivatives Exposures**

<i>€ in millions</i>		<b>As of December 2023</b>	
		a	b
		Protection bought	Protection sold
<b>Notionals</b>			
1	Single-name credit default swaps	€ 89,834	€ 87,301
2	Index credit default swaps	73,739	73,599
3	Total return swaps	362	362
4	Credit options	6,494	6,744
5	Other credit derivatives	3,739	3,663
6	<b>Total notionals</b>	<b>€ 174,168</b>	<b>€ 171,669</b>
<b>Fair values</b>			
7	Positive fair value (asset)	€ 701	€ 2,925
8	Negative fair value (liability)	€ (2,973)	€ (593)

**Wrong-way Risk**

Wrong Way Risk arises when there is a significant positive correlation between the probability of default of a counterparty and our exposure to that counterparty (net of the market value of any collateral we receive). Wrong-way risk is commonly categorised into two types: specific wrong-way risk and general wrong-way risk. The bank categorises exposure as specific wrong-way risk when our counterparty and the issuer of the reference asset of the transaction are the same entity or are affiliates, or if the collateral supporting a transaction is issued by the counterparty or its affiliates. General wrong-way risk arises when there is a significant positive correlation between the probability of default of a counterparty and general market risk factors affecting the exposure to that counterparty. GSBE has procedures in place to actively identify, monitor and control specific and general wrong-way risk, beginning at the inception of a transaction and continuing through its life, including assessing the level of risk through stress tests. The bank ensures that material wrong-way risk is mitigated using collateral agreements or increases to initial margin, where appropriate.

**Credit Valuation Adjustment Risk-Weighted Assets**

RWAs for CVA address the risk of losses related to changes in counterparty credit risk arising from OTC derivatives. We calculate RWAs for CVA primarily using the Advanced CVA approach set out in CRR, which permits the use of regulator approved VaR models. Consistent with our Regulatory VaR calculation (see “Market Risk” for further details), the CVA RWAs are calculated at a 99% confidence level over a 10-day time horizon.

The CVA RWAs also include a stressed CVA component, which is also calculated at a 99% confidence level over a 10-day time horizon using both a stressed VaR period and stressed Expected Exposures. The CVA VaR model estimates the impact on the bank’s credit valuation adjustments of changes to counterparties’ credit spreads. It may reflect eligible CVA hedges (as defined in CRR), but it excludes those hedges that, although used for risk-management purposes, are ineligible for inclusion in the regulatory CVA VaR model. Examples of such hedges are interest rate hedges, or those that do not reference the specific exposures they are intended to mitigate but are nevertheless highly correlated to the underlying credit risk.

**Other Credit Risk-Weighted Assets**

Credit RWAs also include the following components:

**Cleared Transactions**

RWAs for cleared transactions and default fund contributions (defined as payments made by clearing members to central clearing agencies pursuant to mutualised loss arrangements) are calculated based on specific rules within CRR. A majority of the bank’s exposures on centrally cleared transactions are to counterparties that are considered to be Qualifying Central Counterparties (QCCPs) in accordance with the European Market Infrastructure Regulation (EMIR). Such exposures may arise from OTC derivatives, exchange-traded derivatives, and securities financing transactions and are required to be risk weighted at either 2% or 4% based on the specified criteria.

**Other Assets**

Other assets primarily include fixed assets and assets for which there is no defined capital methodology or that are not material. RWAs for other assets are generally based on the carrying value and are typically risk weighted at 100%.

**Equity Exposures in the Banking Book**

The bank has direct investments in equity securities of its affiliated companies. These investments are typically longer-term in nature and they are therefore classified for regulatory capital purposes as banking book equity investments.

**Default, past due exposures, impaired exposures and impairment provisions**

A default is considered to have occurred when either or both of the following events have taken place: (i) we consider that the obligor is unlikely to pay its credit obligations to us in full; or (ii) the exposure is considered past due.

The bank’s definition of unlikeliness to pay include:

- Bankruptcy, insolvency or local jurisdictional equivalent (e.g. conservatorship, winding-up, etc.) of a counterparty or commencement of an involuntary proceeding against the counterparty for bankruptcy or similar legal process
- Distressed restructuring of an obligation due to the financial distress of a borrower, including bank loan obligations, where concessions granted result in a diminished obligation to GS, whether or not counterparty is in bankruptcy, insolvency or local jurisdictional equivalent.

**Pillar 3 Disclosures**

- Estimated high probability of imminent / near-term risk of financial default, bankruptcy, distressed liquidation or distressed restructuring.
- Distressed fund liquidations to meet margin or other contractual obligations (excluding voluntary liquidation as a result of underperformance).
- Situation where we place an obligation on non-accrual, consider the obligation credit-impaired, or material mark down a facility as a result of significant perceived decline in credit quality.
- Situation where we experience a material credit-related economic loss from the sale of all or a part of an asset or from the transfer of an asset from held-for-investment to held-for-sale or fair value accounting.
- Cross-default to any of the above for a counterparty

Payments aged more than 90 days on any material credit obligation to the bank and/or the payments beyond the agreed grace period are considered past due.

An exposure is considered impaired when it is probable that the borrower will be unable to pay all amounts due, including principal and interest, according to the contractual terms of the agreement.

Loans that are deemed to be impaired are evaluated individually to estimate impairment provisions based on one of the following methods: (i) The present value of expected future cash flows discounted at the loan's effective interest rate i.e. the Probability Weighted Enterprise Value ("EV") Method (for non-collateral dependent loans), (ii) The fair value of the underlying collateral (for collateral-dependent loans) and (iii) The loan's observable fair value market price.

The applicability of these methods may differ based on the loan characteristics, such as product type, primary source of repayment, industry, or region.

**Expected Credit Losses**

The bank assesses the expected credit losses (ECL) associated with financial assets measured at amortised cost on a forward looking basis in accordance with the provisions of IFRS 9 'Financial Instruments'.

For information on GSBE's ECL associated with financial assets measured at amortised cost, see Note 2. Summary of Significant Accounting Policies – Financial Assets and Liabilities – Impairment of GSBE's 2023 IFRS Financial Information.



## Securitisations

### Overview

CRR defines certain activities as securitisation transactions which attract capital requirements under the “Securitisation Framework.” A securitisation is defined as a transaction or scheme, whereby the credit risk associated with an exposure or pool of exposures is tranching, having both of the following characteristics:

- Payments in the transaction or scheme are dependent upon the performance of the exposure or pool of exposures; and
- The subordination of tranches determines the distribution of losses during the ongoing life of the transaction or scheme.

The rules also distinguish between traditional and synthetic securitisations, the primary difference being that a traditional securitisation involves the transfer of assets from a bank’s balance sheet into a securitisation vehicle, whereas a synthetic securitisation involves the transfer of credit risk through credit derivatives or guarantees.

GSBE engages in business activities that use securitisations. The main objective is to provide clients with access to risk and returns related to specific portfolios of assets. GSBE currently holds the risk retention portion of securitised mortgages issued by securitisation vehicles (e.g., trusts and special purpose vehicles) as part of the bank’s role as the originator. Securitisation positions may qualify as simple, transparent and standardised securitisations (STS). As of December 2023 there are no STS positions in GSBE. Risk retentions are subject to the standard monitoring process with risk management actions such as hedging or disposals constrained by regulatory requirements.

Beneficial interests issued by securitisation entities are debt or equity securities that give the investors rights to receive all or portions of specified cash inflows to a securitisation vehicle and include senior and subordinated interests in principal, interest and/or other cash inflows. The proceeds from the sale of beneficial interests are used to pay the transferor for the financial assets sold to the securitisation vehicle or to purchase securities which serve as collateral.

GSBE accounts for a securitisation of assets as a sale when we have transferred the financial assets and, in a transaction, where substantially all of the risk and the reward of the financial assets is also transferred. Prior to securitisation, we

account for assets pending transfer at fair value consistent with our IFRS 9 business model for those assets and therefore do not typically recognise significant gains or losses upon the transfer of assets.

### Banking Book Activity

All securitisation exposures as of December 2023 were classified in the banking book. The securitisation exposures in the banking book within GSBE that meet the regulatory definition of a securitisation are exposures that GSBE holds with the objective of meeting the risk retention requirement as originator according to Regulation (EU) 2017/2402 that require to retain on an ongoing basis a material economic interest in the securitisation of not less than 5%. The list of legal entities that are affiliated with the bank and that may invest in securitisations originated by the bank primarily include Goldman Sachs International, Goldman Sachs International Bank, Goldman Sachs Bank USA, Goldman Sachs Lending Partners LLC, GS EMI Ireland Designated Activity Company.

By engaging in the banking book securitisation activities noted above, GSBE is primarily exposed to credit risk and to the performance of the underlying assets where GSBE is the originator and retention holder. Liquidity risk associated with securitisations is consistently managed as part of the bank’s overall liquidity risk management framework. Part of the bank’s securitisations exposure involve significant risk transfer from GSBE. For additional details on GSBE’s risk management process and practices, see “Credit Risk” and “Market Risk” sections of this report, which also apply to securitisation positions covered in this chapter.

### Calculation of Risk-Weighted Assets

The current securitisation framework came into effect in 2019. All securitisation exposures held by GSBE are capitalized under this securitisation framework.

The hierarchy consists of three primary methods, the SEC-IRBA (Internal Ratings Based Approach), SEC-SA (Standardised Approach), and SEC-ERBA (External Ratings Based Approach). The External Credit Assessment Institutions (ECAIs) used for the SEC-ERBA are Standard & Poor’s Ratings Services (S&P), Moody’s Investors Service (Moody’s) and Fitch, Inc. (Fitch) for all types of exposures. For trading and banking book positions we follow the hierarchy of RWA approaches.

## **Pillar 3 Disclosures**

The RWAs for securitisation positions are calculated by multiplying the exposure amount by the specific risk-weighting factors assigned. The exposure amount is defined as the carrying value for securities, or the market value of the effective notional of the instrument or indices underlying derivative positions.

**Pillar 3 Disclosures**

The following tables show our securitisation exposures in the banking book by type of exposure as of December 2023.

**Table 15: EU-SEC1 – Securitisation exposures in the non-trading book**

<i>€ in millions</i>															As of December 2023	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator						Institution acts as sponsor				Institution acts as investor				
		Traditional		Synthetic		Traditional				Traditional						
		STS	Non-STS													
		of which SRT	of which SRT	of which SRT		Sub-total	STS	Non-STS	Synthetic	Sub-total	STS	Non-STS	Synthetic	Sub-total		
1	<b>Total exposures</b>	-	-	€ 39	€ 39	-	-	€ 39	-	-	-	-	-	-	-	-
2	Retail (total)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Residential Mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Credit Card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Other Retail Exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Re-Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	39	39	-	-	39	-	-	-	-	-	-	-	-
8	Loans To Corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Commercial Mortgage	-	-	39	39	-	-	39	-	-	-	-	-	-	-	-
10	Lease And Receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Other Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Re-Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

**Table 16: EU-SEC3 – Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as originator or as sponsor**

<i>€ in millions</i>																	As of December 2023	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure Values by RW bands/deductions					Exposure Value (by regulatory approach)				RWA (by regulatory approach)				Capital Charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW	SEC-IRBA	SEC-ERBA (jncl. IAA)	SEC-SA	Of which 1250% RW	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	Of which 1250% RW	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	Of which 1250% RW
1	<b>Total Exposure</b>	€ 6	-	-	€ 33	-	-	-	€ 39	-	-	-	€ 79	-	-	-	€ 6	-
2	<b>Traditional Transactions</b>	€ 6	-	-	€ 33	-	-	-	€ 39	-	-	-	€ 79	-	-	-	€ 6	-
3	<b>Securitisation</b>	€ 6	-	-	€ 33	-	-	-	€ 39	-	-	-	€ 79	-	-	-	€ 6	-
4	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	6	-	-	33	-	-	-	39	-	-	-	79	-	-	-	6	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	<b>Synthetic Transactions</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	<b>Securitisation</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

**Pillar 3 Disclosures****Table 17: EU-SEC5 – Exposures securitised by the institution – Exposures in default and specific credit risk adjustments**

<i>€ in millions</i>		<b>As of December 2023</b>	
	<b>a</b>	<b>b</b>	<b>c</b>
<b>Exposures securitised by the institution – Institution acts as originator or as sponsor</b>			
<b>Total outstanding nominal amount</b>			
		<b>Of which exposures in default</b>	<b>Total amount of specific credit risk adjustments made during the period</b>
<b>1 Total exposures</b>	<b>€ 849</b>	-	-
<b>2 Retail (total)</b>	-	-	-
3 Residential mortgage	-	-	-
4 Credit card	-	-	-
5 Other retail exposures	-	-	-
6 Re-securitisation	-	-	-
<b>7 Wholesale (total)</b>	<b>€ 849</b>	-	-
8 Loans to corporates	-	-	-
9 Commercial mortgage	849	-	-
10 Lease and receivables	-	-	-
11 Other wholesale	-	-	-
12 Re-securitisation	-	-	-

## Market Risk

### Overview

Market risk is the risk of an adverse impact to the earnings due to changes in market conditions. Categories of market risk include the following:

- Interest rate risk and credit spread risk: results from exposures to changes in the level, slope and curvature of yield curves, the volatilities of interest rates, prepayment speeds and credit spreads;
- Equity price risk: results from exposures to changes in prices and volatilities of individual equities, baskets of equities and equity indices;
- Currency rate risk: results from exposures to changes in spot prices, forward prices and volatilities of currency rates; and
- Commodity price risk: results from exposures to changes in spot prices, forward prices and volatilities of commodities, such as crude oil, petroleum products, natural gas, electricity, and precious and base metals.

Market Risk, which is independent of the revenue-producing units and reports to the bank's CRO, has primary responsibility for assessing, monitoring and managing market risk through oversight across the bank's businesses. GSBE's framework for managing market risk is consistent with and part of GS Group's framework.

Managers in revenue-producing units and Market Risk discuss market information, positions and estimated loss scenarios on an ongoing basis. Managers in revenue-producing units are accountable for managing risk within prescribed limits. These managers have in-depth knowledge of their positions, markets and the instruments available to hedge their exposures.

### Market Risk Management Process

The bank's process for managing market risk includes the critical components of the risk management framework described in the "Overview and Structure of Risk Management" within "Management Report" of GSBE's 2023 Financial Statements, as well as the following:

- Monitoring compliance with established market risk limits and reporting our exposures;
- Diversifying exposures;
- Controlling position sizes; and

- Evaluating mitigants, such as economic hedges in related securities or derivatives.

Market Risk produces risk measures and monitors them against established market risk limits. These measures reflect an extensive range of scenarios and the results are aggregated at product, business, entity and firmwide levels. For additional information regarding market risk measures and risk limits, see "Market Risk Management" within "Management Report" of GSBE's 2023 Financial Statements.

### Market Risk-Weighted Assets

Trading book positions are subject to market risk capital requirements which are designed to cover the risk of loss in value of these positions due to changes in market conditions. These capital requirements are determined either by applying prescribed risk weighting factors in accordance with the standardised approach, or they are based on internal models which are subject to various qualitative and quantitative parameters. The CRR market risk capital rules require that a firm obtains prior written permission from its regulators before using any internal model to calculate its risk-based capital requirement. GSBE has been granted permission to use the Internal Model Approach (IMA) in 2023.

For positions captured by GSBE's model permission, the capital requirements for market risk are calculated using the following internal models: Value-at-Risk (VaR), Stressed VaR (SVaR), and Incremental Risk Charge (IRC). In addition, Standardised Rules, in accordance with Title IV of Part Three of CRR, are used to calculate capital requirements for market risk for certain securitised and non-securitised positions by applying risk-weighting factors predetermined by regulators to positions after applicable netting is performed. RWAs for market risk are the sum of each of these measures multiplied by 12.5. An overview of each of these measures is provided below.

### Regulatory VaR

VaR is the potential loss in value of trading assets and liabilities, as well as certain investments, loans, and other financial assets and liabilities accounted for at fair value, due to adverse market movements over a defined time horizon with a specified confidence level. For both risk management purposes (positions subject to VaR limits) and regulatory capital calculations, the firm uses a single VaR model, which captures risks including those related to interest rates, equity prices, currency rates and commodity prices. As such, VaR

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facilitates comparison across portfolios of different risk characteristics. VaR also captures the diversification of aggregated risk across GSBE.

VaR used for regulatory capital requirements (Regulatory VaR) differs from risk management VaR due to different time horizons and confidence levels (10-day and 99% for Regulatory VaR vs. one-day and 95% for risk management VaR), as well as differences in the scope of positions on which VaR is calculated. The 10-day VaR is based on scaling the 1-day VaR by the square root of 10. Moreover, Regulatory VaR is multiplied by a scaler to obtain an effective observation period of at least one year as per CRR market risk regulatory capital requirements.

VaR is calculated daily using historical simulations with full valuation of market factors, capturing both general and specific market risk. VaR is calculated at a positional level based on simultaneously shocking the relevant market risk factors for that position, using a mix of absolute and relative returns. The bank samples from five years of historical data to generate the scenarios for our VaR calculation. The historical data is weighted so that the relative importance of data reduces over time. This gives greater importance to more recent observations and reflects current asset volatilities.

In accordance with the CRR market risk regulatory capital requirements, GSBE evaluates the accuracy of our Regulatory VaR model through daily backtesting. The results of the backtesting determine the size of the Regulatory VaR multiplier used to compute RWAs.

Table EU MR3 presents the period end, maximum, minimum and average daily GSBE 99% 10-day Regulatory VaR over the twelve-month period ended December 2023.

**Stressed VaR**

SVaR is the potential loss in value of trading assets and liabilities, as well as certain investments, loans, and other financial assets and liabilities accounted for at fair value, during a period of significant market stress. SVaR is based on a full valuation at a 99% confidence level over a 10-day time horizon using market data inputs from a continuous 12-month period of stress. The 10-day SVaR is calculated as the 1-day SVaR scaled by the square root of 10. GSBE identifies the stressed period by comparing VaR using market data inputs from different historical periods.

Table EU MR3 presents the period end, maximum, minimum and average weekly GSBE 99% 10-day SVaR over the twelve-month period ended December 2023.

**Incremental Risk**

Incremental risk is the potential loss in value of non-securitised positions due to the default or credit migration of issuers of financial instruments over a one-year time horizon. As required by the CRR market risk regulatory capital rules, this measure is calculated at a 99.9% confidence level over a one-year time horizon. The model is based on the assumption of a constant level of risk. The model uses a multifactor approach to simulate correlated rating migration and default events, and takes into account various characteristics, including region, industry, basis between different products, credit quality and maturity of the debt. The liquidity horizons are determined based on the speed at which issuer exposures can be reduced by hedging or unwinding, given our experience during a historical stress period, and the prescribed regulatory minimum. The average liquidity horizon as of December 2023 was 3 months.

Table EU MR3 below presents the period end, maximum, minimum and average weekly GSBE Incremental risk measure over the twelve-month period ended December 2023.

**Table 18: EU MR3 – IMA values for trading portfolios**

<i>€ in millions</i>		<b>As of December 2023</b>
<b>VaR (10 day 99%)</b>		
1	Maximum value	64
2	Average value	28
3	Minimum value	17
4	Period end	34
<b>SVaR (10 day 99%)</b>		
5	Maximum value	294
6	Average value	121
7	Minimum value	43
8	Period end	91
<b>IRC (99.9%)</b>		
9	Maximum value	160
10	Average value	96
11	Minimum value	57
12	Period end	94
<b>Comprehensive risk measure (99.9%)</b>		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

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The table below presents the own funds requirements and RWA under the IMA for Market Risk as of December 2023.

**Table 19: EU MR2-A - Market risk under the IMA**

€ in millions		As of December 2023	
		RWEAs	Own funds requirements
<b>1</b>	<b>VaR</b> (higher of values a and b)	<b>€ 1,515</b>	<b>€ 121</b>
(a)	Previous day's VaR (Article 365(1) of the CRR (VaRt-1))		34
(b)	Average of the daily VaR (Article 365(1)) of the CRR on each of the preceding 60 business days (VaRavg) x multiplication factor (mc) in accordance with Article 366 of the CRR		121
<b>2</b>	<b>SVaR</b> (higher of values a and b)	<b>€ 7,399</b>	<b>€ 592</b>
(a)	Latest SVaR (Article 365(2) of the CRR (SVaRt-1))		91
(b)	Average of the SVaR (Article 365(2) of the CRR) during the preceding 60 business days (SVaRavg) x multiplication factor (ms) (Article 366 of the CRR)		592
<b>3</b>	<b>IRC</b> (higher of values a and b)	<b>€ 1,472</b>	<b>€ 118</b>
(a)	Most recent IRC value (incremental default and migration risks calculated in accordance with Article 370 and Article 371 of the CRR)		94
(b)	Average of the IRC number over the preceding 12 weeks		118
<b>4</b>	<b>Comprehensive risk measure</b> (higher of values a, b and c)		-
(a)	Most recent risk number for the correlation trading portfolio (Article 377 of the CRR)		-
(b)	Average of the risk number for the correlation trading portfolio over the preceding 12 weeks		-
(c)	8% of the own funds requirement in the standardised approach on the most recent risk number for the correlation trading portfolio (Article 338(4) of the CRR)		-
<b>5</b>	<b>Other</b>	<b>€ 189</b>	<b>€ 15</b>
<b>6</b>	<b>Total</b>	<b>€ 10,575</b>	<b>€ 846</b>

“Other” (row 5) in the table above includes additional capital according to Article 101 of Directive 2013/36/EU

**Table 20: EU MR2-B - RWEA flow statements of market risk exposures under the IMA**

€ in millions								As of December 2023	
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements	
<b>1</b>	<b>RWEAs at previous reporting period</b>	<b>€ 1,055</b>	<b>€ 2,445</b>	<b>€ 1,666</b>	-	<b>€ 360</b>	<b>€ 5,525</b>	<b>€ 442</b>	
1a	Regulatory adjustment	(777)	(1,512)	(576)	-	(20)	(2,884)	(231)	
<b>1b</b>	<b>RWEAs at previous reporting period</b>	<b>€ 278</b>	<b>€ 933</b>	<b>€ 1,090</b>	-	<b>€ 340</b>	<b>€ 2,641</b>	<b>€ 211</b>	
2	Movement in risk levels	152	200	89	-	(243)	198	16	
3	Model updates/changes	-	-	-	-	-	-	-	
4	Methodology and policy	-	-	-	-	-	-	-	
5	Acquisitions and disposals	-	-	-	-	-	-	-	
6	Foreign exchange movements	-	-	-	-	-	-	-	
7	Other	-	-	-	-	-	-	-	
<b>8a</b>	<b>RWEAs at the end of the reporting period</b>	<b>€ 430</b>	<b>€ 1,133</b>	<b>€ 1,179</b>	-	<b>€ 97</b>	<b>€ 2,839</b>	<b>€ 227</b>	
8b	Regulatory adjustment	1,085	6,266	293	0	92	7,736	619	
<b>8</b>	<b>RWEAs at the end of the reporting period</b>	<b>€ 1,515</b>	<b>€ 7,399</b>	<b>€ 1,472</b>	<b>€ 0</b>	<b>€ 189</b>	<b>€ 10,575</b>	<b>€ 846</b>	

Movement in risk levels (line 2 in the table above) increased by €0.2bn, driven by increased rates exposure impacting SVaR and VaR as well as increased exposure to financials risk parties impacting IRC partially offset by reduced currency exposure impacting Risks not in VaR add-ons (under “Other”).

On July 3, 2023, GSBE received approval to apply the Internal Model Approach for Market Risk. The model permission approved certain products to be in scope of the model and required changes in multipliers to components of modelled market risk. Movement in MR RWA increased by €5.1bn, driven by SVaR and VaR increasing by €5.0bn and €0.5bn respectively, mainly driven by increased multipliers and increased equity exposures.

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**Model Review and Validation**

The models discussed above, which are used to determine Regulatory VaR, SVaR and Incremental Risk, are independently reviewed, validated and approved by Model Risk Management.

These models are regularly reviewed and enhanced in order to incorporate changes in the composition of positions included in market risk measures, as well as variations in market conditions. Prior to implementation in production, any changes to those models are subject to validation and approval by Model Risk Management.

**Regulatory VaR Backtesting Results**

As required by the CRR market risk capital rules, GSBE validate the accuracy of its Regulatory VaR models by backtesting the output of such models against daily loss results. The number of exceptions (that is, the higher of the number of overshootings based on comparing the positional or actual losses to the corresponding 99% one-day Regulatory VaR) over the most recent 250 business days is used to determine the size of the VaR multiplier, which could increase from a minimum of three to a maximum of four, depending on the number of exceptions.

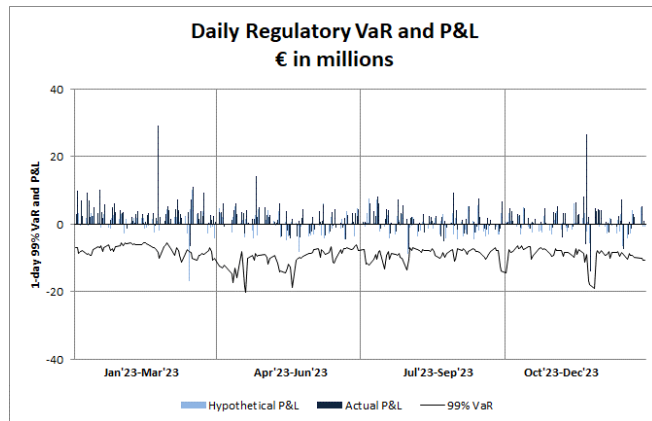
As defined in the CRR market risk capital rules, hypothetical net revenues for any given day represent the impact of that day’s price variation on the value of positions held at the close of business the previous day. As a consequence, these results exclude certain revenues associated with market-making businesses, such as bid/offer net revenues, which are more likely than not to be positive by their nature. In addition, hypothetical net revenues used in GSBE’s Regulatory VaR backtesting relate only to positions which are included in Regulatory VaR and as noted above, differ from positions included in the bank’s risk management VaR. This measure of hypothetical net revenues is used to evaluate the performance of the Regulatory VaR model and is not comparable to the bank’s actual daily net revenues.

GSBE’s hypothetical losses observed on a single day exceeded the 99% one-day Regulatory VaR once (in March 2023) during 12 months preceding December 2023. Hypothetical loss exceedances over 99% one-day Regulatory VaR occurred on the back of increased market volatility driven by the banking crisis. Note that, although a one-day time horizon is used for backtesting purposes, a 10-day time

horizon is used, as described earlier, to determine RWAs associated with Regulatory VaR.

The table below presents GSBE’s 99% one-day Regulatory VaR and hypothetical and actual PnL during the previous 12 months.

**Table 21: EU MR4 – Comparison of VaR estimates with gains/losses**



The table below summarizes the number of reported excesses for GSBE for the previous 12 months.

	Multiplier	Number of reported excesses	
		Hypothetical	Actual
<b>Backtesting</b>			
GSBE	<b>3.00</b>	<b>1</b>	<b>0</b>

**Stress Testing**

Stress testing is a method of determining the effect of various hypothetical stress scenarios on the firm and GSBE individually. Stress testing is used to examine risks of specific portfolios as well as the potential impact of significant risk exposures across GSBE. A variety of stress testing techniques are used to calculate the potential loss from a wide range of market moves on portfolios, including firmwide stress tests, sensitivity analysis and scenario analysis.

For a detailed description of the bank’s stress testing practices, see “Market Risk Management –Stress Testing” within “Management Report” of GSBE’s 2023 Financial Statements.

The table below presents the components of RWAs under Standardised approach as of December 2023.



**Pillar 3 Disclosures****Table 22: EU MR1 - Market risk under the standardised approach**

<i>€ in millions</i>		<b>As of December 2023</b>
		<b>RWEAs</b>
<b>Outright products</b>		
1	Interest rate risk (general and specific)	€ 34
2	Equity risk (general and specific)	-
3	Foreign exchange risk	80
4	Commodity risk	50
<b>Options</b>		
5	Simplified approach	-
6	Delta-plus method	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	<b>Total</b>	<b>€ 164</b>

Total Standardised Market Risk RWA decreased by €0.8bn over the course of 2023 mainly driven by positions moving out of standardised into modeled market risk, following the ECB granting IMA permission.

## Interest Rate Sensitivity

GSBE monitors and sets limits on interest rate risk sensitivity on both trading and banking book activities. GSBE's interest rate risk is managed dynamically in response to changing market conditions.

### Interest Rate Risk in the Trading Book

The bank's exposure to interest rate risk in our trading book arises mostly from positions held to support client market-making activities. These positions are accounted for at fair value and the interest rate risk is monitored as a component of Market risk. For additional information regarding interest rate risk, see "Risk Report – Market Risk Management" within "Management Report" of GSBE's 2023 Financial Statements.

### Interest Rate Risk in the Banking Book

The bank's exposure to interest rate risk in the banking book (IRRBB) arises from changes in the present value of assets and liabilities as interest rates change, as well as differences in interest earned or paid due to the reset characteristics of our assets and liabilities. Changes in market interest rates on banking book assets and liabilities can have an adverse effect on our earnings and economic value.

GSBE evaluates periodically the sensitivity to changes in interest rates across a range of interest rate scenarios,

including parallel rally and sell-off scenarios, using different methodologies such as Net Interest Income (NII) and Economic Value of Equity (EVE) sensitivity analysis. NII sensitivity measures the impacts of changes in rates on the accrued interest of banking book assets and liabilities over a defined time horizon. EVE sensitivity measures the change in the present value of banking book assets and liabilities as a function of different interest rate assumptions.

The GSBE Asset and Liability Committee and Risk Committee are the primary oversight bodies responsible for reviewing and managing GSBE's IRRBB and overseeing the strategic implementation of risk management activities. IRRBB sensitivity is subject to stress testing and to limits.

In addition to monitoring the metrics shown in the table below, GSBE manages to other scenarios such as instantaneous parallel shift in interest rates including unfloored scenarios.

The table below shows the change in banking book EVE and NII sensitivity under the supervisory scenarios and guidance defined by the EBA. The decrease in the projected NII sensitivity over next 12 months using a static balance sheet assumption in the parallel down scenario compared to the last period is primarily driven by an increase in banking book liabilities. The majority of non-maturity deposits in GSBE reprice overnight and therefore do not contribute materially to EVE sensitivity.

**Table 23: EU IRRBB1 - Interest rate risks of non-trading book activities**

Supervisory shock scenarios		a		b		c		d		e		f	
		Changes of the economic value of equity				Changes of the net interest income				Tier 1 capital			
		Dec 2023		Dec 2022		Dec 2023		Dec 2022		Dec 2023		Dec 2022	
1	Parallel up	27	19	11	124								
2	Parallel down	(77)	(70)	(9)	(126)								
3	Steeper	9	10										
4	Flattener	(11)	(19)										
5	Short rates up	5	(3)										
6	Short rates down	(10)	(2)										
	Maximum loss	€ (77)	€ (70)							€ 12,872	€ 8,911		

EVE results in the table above incorporate currency-specific haircuts on net gains. The down shocks incorporate post-shock floors specified by the regulatory guidance for both NII and EVE.

## Operational Risk

### Overview

Operational risk is the risk of an adverse outcome resulting from inadequate or failed internal processes, people, systems, or from external events. GSBE's exposure to operational risk arises from routine processing errors, as well as extraordinary incidents, such as major systems failures or legal and regulatory matters.

Potential types of loss events related to internal and external operational risk include:

- Clients, products and business practices;
- Execution, delivery and process management;
- Business disruption and system failures;
- Employment practices and workplace safety;
- Damage to physical assets;
- Internal fraud; and
- External fraud.

Operational Risk, which is independent of revenue-producing units, and reports to the bank's CRO, has primary responsibility for developing and implementing a formalised framework for assessing, monitoring, and managing operational risk with the goal of maintaining the bank's exposure to operational risk at levels that are within its risk appetite.

The bank's framework for managing operational risk is consistent with the framework of GS Group established by GS Group's Firmwide Risk Appetite Committee. The bank's Operational Risk function is integrated with GS Group's Operational Risk function which reports to GS Group's CRO.

### Operational Risk Management Process

GSBE's process for managing operational risk includes the critical components of the risk management framework described in "Overview and Structure of Risk Management" within "Management Report" within GSBE's 2023 Financial Statements.

The firm combines top-down and bottom-up approaches to manage and measure operational risk. From a top-down perspective, senior management assesses firmwide as well as entity and business-level operational risk profiles, as appropriate. From a bottom-up perspective, the first and

second lines of defence are responsible for risk identification and risk management on a day-to-day basis, including escalating operational risks to senior management.

The firm maintains a comprehensive control framework designed to provide a well-controlled environment to minimise operational risks. The GSBE Operational Risk and Resilience Committee is responsible for overseeing the bank's operational risk, and for ensuring the operational resilience of the bank's business.

GSBE's operational risk management framework is designed to comply with the operational risk measurement rules under the Capital Framework at GS Group level and has evolved based on the changing needs of its businesses and regulatory guidance, including at the GSBE entity level.

A comprehensive data collection process is in place, including firmwide policies and procedures, for operational risk events. According to these policies all employees are required to report and escalate operational risk events. When operational risk events are identified, the policies require that the events be documented and analysed to determine whether changes are required in the systems and/or processes to further mitigate the risk of future events.

GSBE uses operational risk management applications to capture and organise operational risk event data and key metrics. One of the key risk identification and assessment tools is an operational risk and control self-assessment process, which is performed by managers across the firm. This process consists of the identification and rating of operational risks, on a forward-looking basis, and the related controls. The results from this process are analysed to evaluate operational risk exposures and identify businesses, activities, or products with heightened levels of operational risk.

### Risk Measurement

GSBE measures operational risk exposure using both statistical modelling and scenario analyses, which involves qualitative and quantitative assessments of internal and external operational risk event data and internal control factors for each of our businesses. Operational risk measurement also incorporates an assessment of business environment factors, including:

- Evaluations of the complexity of business activities;

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- The degree of automation in our processes;
- New activity information;
- The legal and regulatory environment; and
- Changes in the markets for our products and services, including the diversity and sophistication of our customers and counterparties.

The results from these scenario analyses are used to monitor changes in operational risk and to determine business lines that may have heightened exposure to operational risk. These analyses are used in the determination of the appropriate level of operational risk capital to hold in accordance with GSBE's internal capital adequacy framework.

**Model Review and Validation**

The models used to measure operational risk exposure are independently reviewed, validated, and approved by the Model Risk Management. See "Model Risk" for further information.

**Capital Requirements**

The operational risk capital requirements for GSBE are calculated under the Basic Indicator Approach in accordance with the CRR.

**Table 24: EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts**

Banking activities		As of December 2023				
		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)	€ 1,443	€ 1,571	€ 1,772	€ 239	€ 2,992
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	-	-	-	-	-
3	<u>Subject to TSA:</u>	-	-	-	-	-
4	<u>Subject to ASA:</u>	-	-	-	-	-
5	Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

Operational RWAs increased by €0.9bn in 2023 mainly due to an increase in revenues from business growth over the course of the year.

## Model Risk

### Overview

Model risk is the potential for adverse consequences from decisions made based on model outputs that may be incorrect or used inappropriately. The firm relies on quantitative models across business activities primarily to value certain financial assets and liabilities, to monitor and manage risk, and to measure and monitor regulatory capital.

Model Risk, which is independent of revenue-producing units, model developers, model owners and model users, and reports to the firm's CRO, has primary responsibility for assessing, monitoring, and managing model risk through oversight across global businesses, and provides periodic updates to senior management, risk committees and the Risk Committee of the GS Board.

The model risk management framework is consistently applied across the firm, with the bank's Model Risk function being an integral part of the GS Group's Model Risk function. The head of the bank's Model Risk function has accountability to the bank's CRO for the management of the bank's model risk. Model Risk provides regular updates to the GSBE Risk Committee and the bank's Executive Board.

The firm's model risk management framework is managed through a governance structure and risk management controls, which encompass standards designed to ensure we maintain a comprehensive model inventory, including risk assessment and classification, sound model development practices, independent review and model-specific usage controls. The Firmwide Model Risk Control Committee oversees the firm's model risk management framework. The GSBE Risk Committee, in coordination with Model Risk, is responsible for the ongoing oversight of model risk within GSBE.

### Model Review and Validation Process

Model Risk consists of quantitative professionals who perform an independent review, validation and approval of the models. This review includes an analysis of the model documentation, assumptions, input and output data, limitations and uncertainties, independent testing, an assessment of the appropriateness of the methodology used, verification of compliance with model development and implementation standards, and assessment of adequacy of the

ongoing monitoring plan.

The firm regularly refines and enhances models to reflect changes in market or economic conditions and its business mix. All models are reviewed on an annual basis, and new models or significant changes to existing models and their assumptions are approved prior to implementation.

The model validation process incorporates a review of models and their assumptions in order to critically evaluate and verify the model's conceptual soundness, suitability of calculation techniques, accuracy and sensitivity to input parameters and assumptions, as well as the scope of testing performed by the model developers.

See "Liquidity Risk", "Market Risk", "Credit Risk", and "Operational Risk" for further information about the use of models within these areas.

**Pillar 3 Disclosures****Leverage Ratio**

GSBE is subject to the leverage ratio framework established by the CRR. This leverage ratio compares CRR's definition of Tier 1 capital to a measure of leverage exposure, defined as the sum of certain assets plus certain off-balance-sheet exposures (which include a measure of derivatives, securities financing transactions, commitments and guarantees), less Tier 1 capital deductions. In June 2019, the European Commission published updates to the CRR to implement a 3% minimum leverage ratio requirement for certain E.U.

financial institutions, including GSBE. The required minimum leverage ratio became effective for GSBE on June 28, 2021.

**Table 25: Leverage Ratio**

<i>€ in millions</i>	<b>As of December 2023</b>
Tier 1 Capital	€ 12,872
Leverage Ratio Exposure	€ 112,901
<b>Leverage Ratio</b>	<b>11.40%</b>

The following tables present further information on the leverage ratio. Table EU LR1 below reconciles the exposure measure to the balance sheet of GSBE as per IFRS Financial Information. Table EU LR2 gives further details on the adjustments and drivers of the leverage ratio. Table EU LR3 breaks down the exposures from on-balance sheet assets by trading and banking book.

**Table 26: EU LR1 - Summary Reconciliation of Accounting Assets and Leverage Ratio Exposures**

<i>€ in millions</i>		<b>As of December 2023</b>
1	<b>Total assets as per published financial statements</b>	<b>€ 291,130</b>
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	-
5	(Adjustment for fiduciary assets recognized on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	(176,274)
9	Adjustment for securities financing transactions (SFTs)	2,637
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	9,732
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	(13)
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(14,311)
13	<b>Total exposure measure</b>	<b>€ 112,901</b>

Adjustments for derivatives, SFTs and off-balance sheet items above represent differences between accounting values recognised as assets on the IFRS balance sheet and the leverage ratio exposure values. See below EU LR2 for further breakdown of these differences.

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Table 27: EU LR2 - Leverage Ratio Common Disclosure

<i>€ in millions</i>		As of December 2023	As of December 2022
		CRR leverage ratio exposures	CRR leverage ratio exposures
<b>On-balance sheet exposures (excluding derivatives and SFTs)</b>			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	€ 60,357	€ 44,500
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(12,825)	(13,645)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(109)	(31)
7	<b>Total on-balance sheet exposures (excluding derivatives and SFTs)</b>	<b>€ 47,423</b>	<b>€ 30,824</b>
<b>Derivative exposures</b>			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	€ 9,600	€ 11,330
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	25,094	20,012
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	(455)
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	171,663	209,538
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	(167,093)	(204,681)
13	<b>Total derivatives exposures</b>	<b>€ 39,264</b>	<b>€ 35,743</b>
<b>Securities financing transaction (SFT) exposures</b>			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	€ 34,428	€ 27,198
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(17,954)	(13,296)
16	Counterparty credit risk exposure for SFT assets	2,637	569
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	<b>Total securities financing transaction exposures</b>	<b>€ 19,111</b>	<b>€ 14,471</b>
<b>Other off-balance sheet exposures</b>			
19	Off-balance sheet exposures at gross notional amount	€ 11,035	€ 5,937
20	(Adjustments for conversion to credit equivalent amounts)	(3,919)	(2,970)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	(13)	-
22	<b>Off-balance sheet exposures</b>	<b>€ 7,103</b>	<b>€ 2,967</b>
<b>Excluded exposures</b>			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units): - Promotional loans: - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-

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EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
<b>Capital and total exposure measure</b>			
23	<b>Tier 1 capital</b>	<b>€ 12,872</b>	<b>€ 8,911</b>
24	<b>Total exposure measure</b>	<b>€ 112,901</b>	<b>€ 84,006</b>
<b>Leverage ratio</b>			
25	Leverage ratio	11.4%	10.6%
EU-25	Leverage ratio excluding the impact of the exemption of public sector investments and promotional loans (%)	11.4%	10.6%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	11.4%	10.6%
26	Regulatory minimum leverage ratio requirement (%)	3.0%	3.0%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.0%	0.0%
EU-26b	of which: to be made up of CET1 capital (percentage points)	0.0%	0.0%
27	Leverage ratio buffer requirement (%)	0.0%	0.0%
EU-27a	Overall leverage ratio requirement (%)	3.0%	3.0%
<b>Choice on transitional arrangements and relevant exposures</b>			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	NA	NA
<b>Disclosure of mean values</b>			
28	Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	18,456	18,611
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	16,473	13,902
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	114,884	88,715
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	114,884	88,715
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	11.2%	10.0%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	11.2%	10.0%



**Pillar 3 Disclosures****Table 28: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)**

<i>€ in millions</i>		<i>As of December 2023</i>
<b>EU-1</b>	<b>Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:</b>	<b>€ 47,501</b>
<b>EU-2</b>	<b>Trading book exposures</b>	<b>€ 28,431</b>
<b>EU-3</b>	<b>Banking book exposures, of which:</b>	<b>€ 19,070</b>
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	15,178
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-
EU-7	Institutions	1,417
EU-8	Secured by mortgages of immovable properties	-
EU-9	Retail exposures	-
EU-10	Corporate	2,078
EU-11	Exposures in default	89
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	308

**Factors impacting the Leverage Ratio**

The leverage ratio has increased from 10.6% as of December 2022 to 11.4% as of December 2023 primarily due to increased own funds partially offset by an increase in both on and off-balance sheet exposures reflecting increased balance sheet size and business activities throughout the year.

The bank has assessed the risk of excessive leverage for the reference date of these disclosures to not be material.

**Risk of Excessive Leverage**

The risk of excessive leverage is the risk resulting from a vulnerability due to leverage or contingent leverage that may require unintended corrective measures to the bank's business plan, including distressed selling of assets which might result in losses or in valuation adjustments to our remaining assets.

The GSBE ALCO is the primary governance committee for the management of the bank's balance sheet. The GSBE ALCO is responsible for maintaining leverage ratio in accordance with the levels expressed in the bank's risk appetite statement and ICAAP.

GSBE monitors the leverage ratio regularly and has processes in place to dynamically manage our assets and liabilities. Leverage ratio monitoring thresholds have been established for GSBE and reported to the ALCO, CRO, CFO, CEO, Risk Committee and Executive Board if the ratio drops below these escalation thresholds.

Potential new transactions which could have a material impact on GSBE capital and/or leverage position are escalated to managers from independent control and support functions.

## **Capital Adequacy**

### **Overview**

Capital adequacy is of critical importance to the bank. We have in place a comprehensive capital management policy that provides a framework, defines objectives, and establishes guidelines to assist us in maintaining the appropriate level and composition of capital in both business-as-usual and stressed conditions.

We determine the appropriate level and composition of capital by considering multiple factors including current and future regulatory capital requirements, results of capital planning and stress testing processes and other factors such as rating agency guidelines, the business environment, and conditions in the financial markets.

### **Internal Capital Adequacy Assessment Process**

We perform an ICAAP with the objective of ensuring that GSBE is appropriately capitalised relative to the risks in our business. We assess capital adequacy based on two complementary perspectives, the Economic Internal Perspective, and the Normative Perspective. In both perspectives, we define, and articulate capital adequacy based

on the comparison of available capital resources against the amount of capital needed to mitigate material risks.

In the Economic Internal Perspective, we define our internal capital adequacy based on the ratio of our internal capital to the sum of risks that could have a material impact on our capital position from an economic (i.e., fair market value) perspective, including a three-year forward-looking basis, quantified using internal methodologies. In the Normative Perspective capital adequacy is considered from a regulatory and accounting view, by comparing the regulatory definition of capital resources to regulatory capital requirements for material risks. We assess our ability to maintain sufficient capital to meet Overall Capital Requirements (OCR) in a baseline scenario and minimum of Total SREP Capital Requirements (TSCR) under an adverse scenario over a three-year projection horizon.

GSBE ensures sufficient capital adequacy in both the Economic Internal Perspective and in the Normative Perspective.

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## Own Funds Template

The table below presents further information on the detailed capital position of GSBE.

Table 29: EU CC1 - Composition of regulatory own funds

<i>€ in millions</i>		As of December 2023	
		(a)	(b)
		Amounts	Source based on reference numbers / letters of the balance sheet under the regulatory scope of consolidation
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>			
1	<b>Capital instruments and the related share premium accounts</b>	<b>€ 355</b>	Row 14 and 15 of CC2 template
	of which: Ordinary Shares	355	
	of which: Instrument type 2	0	
	of which: Instrument type 3	0	
2	Retained earnings	2,051	Row 17 of CC2 template
3	Accumulated other comprehensive income (and other reserves)	10,578	Row 16 and 18 of CC2 template
EU-3a	Funds for general banking risk	0	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	0	
5	Minority interests (amount allowed in consolidated CET1)	0	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	0	
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>€ 12,984</b>	
<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>			
7	Additional value adjustments (negative amount)	(76)	
8	Intangible assets (net of related tax liability) (negative amount)	(32)	
9	Not applicable	0	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	0	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	0	
12	Negative amounts resulting from the calculation of expected loss amounts	0	
13	Any increase in equity that results from securitised assets (negative amount)	0	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	1	
15	Defined-benefit pension fund assets (negative amount)	0	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	0	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
20	Not applicable	0	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	0	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	0	
EU-20c	of which: securitisation positions (negative amount)	0	
EU-20d	of which: free deliveries (negative amount)	0	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	0	
22	Amount exceeding the 17,65% threshold (negative amount)	0	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	0	
24	Not applicable	0	
25	of which: deferred tax assets arising from temporary differences	0	
EU-25a	Losses for the current financial year (negative amount)	0	

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EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	0
26	Not applicable	0
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	0
27a	Other regulatory adjustments	(5)
28	<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>€ (112)</b>
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>€ 12,872</b>
<b>Additional Tier 1 (AT1) capital: instruments</b>		
30	Capital instruments and the related share premium accounts	-
31	of which: classified as equity under applicable accounting standards	-
32	of which: classified as liabilities under applicable accounting standards	-
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	-
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	-
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-
35	of which: instruments issued by subsidiaries subject to phase out	-
36	<b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>	-
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>		
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-
41	Not applicable	-
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-
42a	Other regulatory adjustments to AT1 capital	-
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	-
44	<b>Additional Tier 1 (AT1) capital</b>	-
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>€ 12,872</b>
<b>Tier 2 (T2) capital: instruments</b>		
46	Capital instruments and the related share premium accounts	20
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	-
EU-47a	Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2	-
EU-47b	Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2	-
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-
49	of which: instruments issued by subsidiaries subject to phase out	-
50	Credit risk adjustments	-
51	<b>Tier 2 (T2) capital before regulatory adjustments</b>	<b>€ 20</b>
<b>Tier 2 (T2) capital: regulatory adjustments</b>		
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-
54a	Not applicable	-
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-
56	Not applicable	-
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-
56b	Other regulatory adjustments to T2 capital	-

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57	Total regulatory adjustments to Tier 2 (T2) capital	-
58	Tier 2 (T2) capital	€ 20
59	Total capital (TC = T1 + T2)	€ 12,892
60	Total risk exposure amount	€ 36,045
<b>Capital ratios and requirements including buffers</b>		
61	Common Equity Tier 1	35.7%
62	Tier 1	35.7%
63	Total capital	35.8%
64	Institution CET1 overall capital requirements	10.0%
65	of which: capital conservation buffer requirement	2.5%
66	of which: countercyclical capital buffer requirement	0.8%
67	of which: systemic risk buffer requirement	0.0%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0.5%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.7%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	24.8%
<b>National minima (if different from Basel III)</b>		
69	Not applicable	-
70	Not applicable	-
71	Not applicable	-
<b>Amounts below the thresholds for deduction (before risk weighting)</b>		
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	300
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	1
74	Not applicable	0
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	98
<b>Applicable caps on the inclusion of provisions in Tier 2</b>		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	0
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	0
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-
<b>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)</b>		
80	Current cap on CET1 instruments subject to phase out arrangements	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	0.0%
82	Current cap on AT1 instruments subject to phase out arrangements	0.0%
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	0.0%
84	Current cap on T2 instruments subject to phase out arrangements	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-

GSBE does not make use of any transitional provisions for calculating its regulatory capital resources, including transitional arrangements on IFRS 9 and hence no further disclosures are made in this regard.

## Pillar 3 Disclosures

## Countercyclical Capital Buffer Template

The following tables present information on the impact of the countercyclical capital buffer as prescribed under CRR 440.

Table 30: EU CCyB2 - Countercyclical Capital Buffer

€ in millions	As of December 2023
<b>Total risk exposure amount</b>	<b>€ 36,045</b>
Institution specific countercyclical capital buffer rate	<b>0.84%</b>
Institution specific countercyclical capital buffer requirement	<b>302</b>

As of December 2023, GSBE had recognised exposures to counterparties from below countries as implemented in the calculation of countercyclical capital buffer according to rates set by the ESRB, BIS and Bank of England. Breakdown by countries for their respective contributions to own funds requirements for GSBE are provided in below table 31.

The GSBE specific countercyclical capital buffer rate has increased to 0.84% as of December 2023 from 0.29% as of December 2022 primarily due to the introduction of new buffer rates against Netherlands at 1% and Germany 0.75% and an increase in the existing buffer rate for the United Kingdom to 2%.

The geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer is broken down in Table EU CCyB1 below.

Table 31: EU CcyB1 Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

€ in millions													As of December 2023	
a	b	c	d	e	f	g	h	i	j	k	l	m		
General credit exposures		Relevant credit exposures – Market risk			Securitisation exposures - Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Relevant credit risk exposures – Credit risk			Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total					
<b>Breakdown by country:</b>														
Cyprus	€ 84	-	-	€ 2	-	€ 86	€ 7	€ 0	-	€ 7	€ 93	0.6%	0.5%	
Czech Republic	-	-	-	16	-	16	-	0	-	0	3	0.0%	2.0%	
Denmark	494	-	-	1,407	-	1,902	40	1	-	41	511	3.0%	2.5%	
Estonia	3	-	-	1	-	5	0	0	-	0	4	0.0%	1.5%	
France	4,388	-	-	27,521	-	31,909	154	12	-	165	2,065	12.2%	0.5%	
Germany	3,703	-	358	136,434	-	140,494	198	15	-	213	2,657	15.7%	0.8%	
Ireland	673	-	-	298	24	995	7	13	4	24	296	1.8%	1.0%	
Lithuania	1	-	-	0	-	1	0	0	-	0	1	0.0%	1.0%	
Luxembourg	1,626	-	-	297	-	1,923	103	2	-	105	1,308	7.8%	0.5%	
Netherlands	3,326	-	-	10,237	-	13,562	215	2	-	217	2,708	16.0%	1.0%	
Norway	85	-	-	115	-	200	7	1	-	7	93	0.6%	2.5%	

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Slovakia	0	-	-	30	-	30	0	0	-	0	2	0.0%	1.5%
Slovenia	-	-	-	64	-	64	-	0	-	0	4	0.0%	0.5%
Sweden	565	-	-	551	-	1,116	31	0	-	31	391	2.3%	2.0%
United Kingdom	4,900	-	-	52,489	-	57,389	197	5	-	202	2,529	15.0%	2.0%
Australia	23	-	-	14	-	37	0	1	-	1	11	0.1%	1.0%
Croatia	0	-	-	-	-	0	0	-	-	0	0	0.0%	1.0%
Hong Kong	33	-	-	-	-	33	3	-	-	3	33	0.2%	1.0%
Iceland	6	-	-	15	-	21	0	0	-	1	8	0.0%	2.0%
Other	4,619	-	-	91,425	15	96,059	262	68	2	333	4,157	24.6%	0.0%
<b>Total</b>	<b>€ 24,529</b>	<b>-</b>	<b>€ 358</b>	<b>€ 320,916</b>	<b>€ 39</b>	<b>€ 345,842</b>	<b>€ 1,224</b>	<b>€ 120</b>	<b>€ 6</b>	<b>€ 1,350</b>	<b>€ 16,874</b>	<b>100.0%</b>	

## Prudential Valuation Adjustments

Prudent Valuation Adjustment (“PVA”) represents the excess of valuation adjustments required to achieve prudent value, over any adjustment applied in the bank’s fair value that addresses the same source of valuation uncertainty. GSBE has documented policies and maintains systems and controls for the calculation of Prudent Valuation Adjustment (“PVA”) as required by the Commission Delegated Regulation (EU) No. 2016/101. For a valuation input where the range of plausible values is created from mid prices, prudent value represents the point within the range where the firm is 90% confident that the mid value which could be achieved in exiting the valuation exposure would be at that price or better. The bank’s methodology addresses fair value uncertainties arising from a number of sources; market price uncertainty, close-out costs, model risk, unearned credit spreads, investing and funding cost, concentrated positions, future administrative costs, early termination and operational risk. Methodologies utilised by our independent control functions to calculate PVA are aligned with, and use the same external data sources as, those used when carrying out price verification of fair value.

On March 31, 2023, the ECB published the results of its asset quality review of the bank, following which, on March 8, 2024, the ECB issued a decision requiring the bank to temporarily deduct €131 million from its CET1 capital until certain findings were addressed. The deduction was implemented from the date of the decision on March 8, 2024.

**Table 32: EU PV1: Prudent valuation adjustments (PVA)**

€ in millions										As of December 2023	
	a	b	c	d	e	EU e1	EU e2	f	g	h	
	Risk category					Category level AVA - Valuation uncertainty					
Category level AVA	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book	
Market price uncertainty	€ 8	€ 29	€ 0	€ 28	€ 0	€ 3	€ 5	€ 37	€ 34		€ 3
Not applicable											
Close-out cost	11	0	0	2	0	0	0	7	7		0
Concentrated positions	0	0	0	3	0	NA	NA	3	3		0
Early termination	0	0	0	0	0	NA	NA	0	0		0
Model risk	4	0	0	0	0	47	0	26	26		0
Operational risk	1	2	0	2	0	NA	NA	4	4		0
Not applicable											
Not applicable											
Future administrative costs	0	0	0	0	0	NA	NA	0	0		0
Not applicable											
<b>Total Additional Valuation Adjustments (AVAs)</b>								<b>€ 77</b>	<b>€ 74</b>		<b>€ 3</b>



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## Capital Instruments

The following table summarises the main features of capital instruments for GSBE as of December 2023

**Table 33: EU CCA: Main features of regulatory own funds instruments**

		As of December 2023		
€ in millions		a	b	c
1	Issuer	GSBE	GSBE	GSBE
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A	N/A
2a	Public or private placement	Private	Private	Private
3	Governing law(s) of the instrument	Germany	Germany	Germany
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A
<i>Regulatory treatment</i>				
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Tier 2	MREL
5	Post-transitional CRR rules	Common Equity Tier 1	Tier 2	MREL
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Ordinary share capital	Subordinated debt	Subordinated debt
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	€ 329	€ 20	€ 800
9	Nominal amount of instrument	€ 329	€ 20	€ 800
EU-9a	Issue price	At par	At par	At par
EU-9b	Redemption price	At par	At par	At par
10	Accounting classification	Shareholder's equity	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	01/07/2011; 25/02/2019; 07/06/2020; 05/11/2020; 08/2/2021	22/03/2004; 15/04/2008	2/3/2031
12	Perpetual or dated	Perpetual	Perpetual	Dated
13	Original maturity date	No maturity	No maturity	2/3/2031
14	Issuer call subject to prior supervisory approval	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A
<i>Coupons / dividends</i>				
17	Fixed or floating dividend/coupon	N/A	Floating	Floating
18	Coupon rate and any related index	No	3m Euribor + 210 bps	12m Euribor + 60bps
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Nonconvertible	Nonconvertible	Nonconvertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	No	No	No
31	If write-down, write-down trigger(s)	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	3	4
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 2	Repayment of loan only after claims of other, non-subordinated creditors	Claims subordinated by virtue of a contractual subordination clause not specifying the

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				pertinent rank (other than Additional Tier 1 or Tier 2 instruments)
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A	<a href="https://www.goldmansachs.com/disclosures/pdfs/subordinated-loan-agreement.pdf">https://www.goldmansachs.com/disclosures/pdfs/subordinated-loan-agreement.pdf</a>	N/A

**Key changes during the period**

No highlights.

## Liquidity Risk Management

### Introduction

Liquidity risk is the risk that the bank will be unable to fund itself or meet its liquidity needs in the event of bank-specific, broader industry, or market liquidity stress events. The bank has in place a comprehensive and conservative set of liquidity and funding policies. The bank's principal objective is to be able to fund itself and to enable its core businesses to continue to serve clients and generate revenues, even under adverse circumstances.

Corporate Treasury, which reports to the bank's CFO, has primary responsibility for developing, managing and executing the bank's liquidity and funding strategy within its risk appetite.

Liquidity Risk, which is independent of the revenue-producing units and Treasury, and reports to the bank's CRO, has primary responsibility for identifying, monitoring and managing the bank's liquidity risk through oversight across the bank's businesses and the establishment of stress testing and limits frameworks. The bank's framework for managing liquidity risk is consistent with, and part of, the GS Group framework.

GSBE has a robust liquidity risk management framework in place, which the bank considers adequate. It leverages this framework to maintain a sufficient amount of liquidity to ensure GSBE remains appropriately funded and liquid in the event of stress.

The bank manages liquidity risk according to three principles: (i) hold sufficient excess liquidity in the highest quality to cover outflows during a stressed period, (ii) maintain appropriate Asset-Liability Management and (iii) maintain a viable Contingency Funding Plan.

### Liquid Assets

Global Core Liquid Assets (GCLA) is liquidity that the bank maintains to meet a broad range of potential cash outflows and collateral needs in a stressed environment. A primary liquidity principle is to pre-fund estimated potential cash and collateral needs during a liquidity crisis and hold this liquidity in the form of unencumbered, highly liquid securities and cash. The bank believes that the securities held in its GCLA would be readily convertible to cash in a matter of days, through liquidation, by entering into repurchase agreements or from maturities of resale agreements, and that this cash would allow it to meet immediate obligations without needing

to sell other assets or depend on additional funding from credit-sensitive markets.

The bank's GCLA is distributed across asset types, issuers and clearing agents to provide sufficient operating liquidity to ensure timely settlement in all major markets, even in a difficult funding environment.

### Limits

The bank uses liquidity risk limits at various levels and across liquidity risk types to manage the size of its liquidity exposures. Limits are measured relative to acceptable levels of risk given the liquidity risk tolerance of the bank. The purpose of these limits is to assist senior management in monitoring and controlling the bank's overall liquidity profile.

The Executive Board approves the bank's risk appetite. Additional limits are derived from the RAS and are approved by the Risk Committee and at departmental levels. They are reviewed frequently and amended, with required approvals, on a permanent and temporary basis, as appropriate, to reflect changing market or business conditions.

Limits are monitored by Treasury and Liquidity Risk. Liquidity Risk is responsible for identifying and escalating to the Executive Board and/or the Risk Committee, on a timely basis, instances where limits have been exceeded.

### Contingency Funding Plan

GS Group maintains a contingency funding plan, which has a GSBE-specific addendum, to provide a framework for analysing and responding to a liquidity crisis situation or periods of market stress. The contingency funding plan outlines a list of potential risk factors, key reports and metrics that are reviewed on an ongoing basis to assist in assessing the severity of, and managing through, a liquidity crisis and/or market dislocation. The contingency funding plan also describes the bank's potential responses if assessments indicate that the bank has entered a liquidity crisis, which includes pre-funding for what the bank estimates will be its potential cash and collateral needs, as well as utilising secondary sources of liquidity. Mitigants and action items to address specific risks which may arise are also described and assigned to individuals responsible for execution.

The contingency funding plan identifies key groups of individuals and their responsibilities, which include fostering

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effective coordination, control, and distribution of information, implementing liquidity maintenance activities and managing internal and external communication, all of which are critical in the management of a crisis or period of market stress.

**Stress Testing****Stress Tests**

In order to determine the appropriate size of the bank's liquidity pool, an internal liquidity model is used, referred to as the Modelled Liquidity Outflow, which captures and quantifies the bank's liquidity risks over a 30-day stress scenario. Other factors are considered including, but not limited to, an assessment of potential intraday liquidity needs through an additional internal liquidity risk model, referred to as the Intraday Liquidity Model, other applicable regulatory requirements and a qualitative assessment of the condition of the bank as well as the financial markets. The results of the Modelled Liquidity Outflow and the Intraday Liquidity Model are reported to the Executive Board and senior management on a regular basis.

**Modelled Liquidity Outflow**

The Modelled Liquidity Outflow is based on conducting multiple scenarios that include combinations of market-wide stress and GS specific stress, characterised by the following qualitative elements:

- Severely challenged market environments, including low consumer and corporate confidence, financial and political instability, adverse changes in market values, including potential declines in equity markets and widening of credit spreads; and
- A GS specific crisis potentially triggered by material losses, reputational damage, litigation, executive departure, and/or a ratings downgrade.

The following are key modelling elements of the Modelled Liquidity Outflow:

- Liquidity needs over a 30-day scenario;
- A two-notch downgrade of the long-term senior unsecured credit ratings of Group Inc. and its rated subsidiaries;
- Changing conditions in funding markets, which limit the bank's access to unsecured and secured funding;
- A combination of contractual outflows, such as upcoming maturities of unsecured debt, and contingent

outflows.

- No support from additional government funding facilities. Although we have access to central bank funding, we do not assume reliance on additional sources of funding in a liquidity crisis; and
- A combination of contractual outflows and contingent outflows arising from both the bank's on- and off-balance sheet arrangements. Contractual outflows include, among other things, upcoming maturities of unsecured debt, term deposits and secured funding. Contingent outflows include, among other things, increase in variation margin requirements due to adverse changes in the value of the bank's exchange-traded and OTC-cleared derivatives, draws on unfunded commitments and withdrawals of deposits that have no contractual maturity.

**Intraday Liquidity Model**

The bank's Intraday Liquidity Model measures the bank's intraday liquidity needs in a scenario where access to sources of intraday liquidity may become constrained. The intraday liquidity model considers a variety of factors, including historical settlement activity.

**Long Term Stress Testing**

The bank utilises longer-term stress tests to take a forward view on its liquidity position through prolonged stress periods in which the bank experiences a severe liquidity stress and recovers in an environment that continues to be challenging. The bank is focused on ensuring conservative asset-liability management to prepare for a prolonged period of potential stress, seeking to maintain a diversified funding profile with an appropriate tenor, taking into consideration the characteristics and liquidity profile of our assets.

**Resolution Liquidity Models**

In connection with GS Group's resolution planning efforts, GS Group has established a Resolution Liquidity Adequacy and Positioning framework, which estimates liquidity needs of its major subsidiaries, including GSBE, in a stressed environment. GS Group has also established a Resolution Liquidity Execution Need framework, which measures the liquidity needs of its major subsidiaries, including GSBE, to stabilise and wind-down following a Group Inc. bankruptcy filing in accordance with GS Group's preferred resolution strategy.

In addition, GS Group has established a triggers and alerts

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framework, which is designed to provide GS Group’s Board of Directors with information needed to make an informed decision on whether and when to commence bankruptcy proceedings for Group Inc. GSBE has also established Resolution related liquidity triggers as part of its triggers and alerts framework.

The bank also has capabilities to run resolution liquidity models in accordance with guidance published by local resolution authorities. i.e., the SRB.

**Liquidity Coverage Ratio****Overview**

The liquidity coverage ratio (LCR) is designed to ensure that a bank maintains an adequate amount of unencumbered high-quality liquid assets (HQLA) equal to or greater than the total net cash outflows (NCOs) over a prospective 30 calendar-day stress scenario. GSBE is subject to the liquidity requirements as set out in the European Commission Delegated Regulation 2018/1620 and Delegated Regulation 2015/61 to supplement Regulation No 575/2013 of the European Parliament and the Council with regard to liquidity coverage requirement for credit institutions. When we use the term “liquidity standards”, we refer to the aforementioned regulations.

CRR, as amended, which became effective from 28<sup>th</sup> June 2021, requires banks to disclose, on an annual basis, the average monthly LCR for the trailing twelve-months.

GSBE’s average monthly LCR for the trailing twelve-month period ended December 2023 was 161% compared to the minimum requirement of 100%. The calculation of the ratio is based on our current interpretation and understanding of the liquidity standards and may evolve in the future.

The table below presents a breakdown of the bank’s LCR calculated in accordance with the liquidity standards.

**Table 34: Liquidity Coverage Ratio**

<i>€ in millions</i>	<b>Twelve months ended December 2023</b>
	<b>Average Weighted</b>
Total high-quality liquid assets	€ 19,903
Net cash outflows	€ 12,591
Liquidity coverage ratio	161%

The ratio reported above is calculated as average of the monthly LCRs for the trailing twelve months and may not equal the calculation of ratio using component amounts reported in “Total high-quality liquid assets” and “Net cash outflows”.

The bank expect business-as-usual fluctuations in its client activity, business mix and overall market environment to affect GSBE’s average LCR on an ongoing basis.

**High-Quality Liquid Assets**

Total HQLA represents unencumbered, high-quality liquid assets held by a bank. The liquidity standards define HQLA in three asset categories: Level 1, Level 2A and Level 2B, and applies haircuts and limits to certain asset categories.

Level 1 assets are considered the most liquid and are eligible for inclusion in a bank’s HQLA amount without a haircut or limit. Level 2A and 2B assets are considered less liquid than Level 1 assets and are subject to additional adjustments as prescribed in the liquidity standards. In addition, the sum of Level 2A and 2B assets cannot comprise more than 40% of a bank’s HQLA amount, and Level 2B assets cannot comprise more than 15% of a bank’s HQLA amount. The bank’s HQLA substantially consists of Level 1 assets.

**Net Cash Outflows****Overview**

Regulatory requirements define NCOs as the net of cash outflows and inflows during a prospective stress period of 30 calendar days. NCOs are calculated by applying prescribed outflow and inflow rates to certain assets, liabilities, and off-balance-sheet arrangements. These outflow and inflow rates reflect a specific standardised stress scenario to a firm’s funding sources, contractual obligations and assets over the prospective stress period, as prescribed by the regulatory requirements. Due to the inherently uncertain and variable nature of stress events, a firm’s actual cash outflows and inflows in a realised liquidity stress event may differ, possibly materially, from those reflected in a firm’s NCOs.

To capture outflows and inflows that would occur within a 30 calendar-day period, the regulatory requirements require that a firm’s NCOs calculation reflects outflows and inflows based on the contractual maturity of certain assets, liabilities, and off-balance-sheet arrangements. To determine the maturity date of outflows, the regulatory requirements account for any option that could accelerate the maturity date of an instrument or the date of a transaction. Where contractual maturity is not applicable, the regulatory requirements also set forth stressed outflow assumptions. In addition, the regulatory requirements require a firm to recognise contractual outflows within a 30 calendar-day period that are not otherwise described in the regulatory requirements and to not recognise inflows not specified in the regulatory

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requirements. The inflows included in the NCOs calculation are subject to a cap of 75% of a firm's calculated outflows.

Table 34 above presents a summary of GSBE's NCOs, calculated in accordance with the regulatory requirements.

More details on each of the material components of our NCOs, including a description of the applicable sections of the regulatory requirements, are described below.

In the tables referenced in the remainder of this section, unweighted balances reflect certain GSBE's assets, liabilities and off-balance-sheet arrangements captured in the regulatory requirements. Weighted balances reflect the application of prescribed outflow and inflow rates to these unweighted balances.

**Unsecured and Secured Funding**

GSBE's primary sources of funding are deposits, collateralised financings, unsecured short-term and long-term borrowings (including funding from Group Inc. and affiliates), and shareholders' equity. GSBE seeks to maintain broad and diversified funding sources across products, programs, markets, currencies, and creditors.

**Unsecured Net Cash Outflows**

GSBE's unsecured funding consists of a number of different products, including:

- Unsecured long-term borrowings, including registered bonds (Namensschuldverschreibungen), promissory note (Schuldscheindarlehen), debt securities issued, which include notes certificates and warrants, and funding from Group Inc. and affiliates.
- Time deposits and demand deposits from private bank clients, institutional clients and affiliates

GSBE's unsecured debt and deposits are a source of funding for inventory, lending activity and other assets, including a portion of our liquid assets.

The liquidity standards require that the NCOs calculation reflects a bank's upcoming maturities of unsecured long-term borrowing during a 30 calendar-day period, assuming no rollover of debt that matures. The liquidity standards also prescribe outflows related to a partial loss of deposits funding.

Inflows from deposits placed with agent banks and lending activity are included as part of "Inflows from fully performing exposures" (see Table 35).

The table below presents a summary of GSBE's NCOs related to its unsecured borrowing and lending activity, calculated in accordance with the liquidity standards.

**Table 35: Unsecured Net Cash Outflows**

<i>€ in millions</i>	Twelve months ended December 2023	
	Average Unweighted	Average Weighted
<b>Outflows</b>		
<b>Retail deposits and deposits from small business customers, of which:</b>	<b>€ 2,144</b>	<b>€ 353</b>
Stable deposits	0	0
Less stable deposits	2,092	353
<b>Unsecured wholesale funding, of which:</b>	<b>€ 5,334</b>	<b>€ 2,521</b>
Operational deposits	11	3
Non-operational deposits	5,151	2,346
Unsecured debt	172	172
<b>Inflows</b>		
Inflows from fully performing exposures	<b>€ 865</b>	<b>€ 290</b>
<b>Net unsecured cash outflows/(inflows)</b>	<b>€ 6,613</b>	<b>€ 2,584</b>

Net unsecured cash outflows/(inflows) reflects the subtraction of the inflow amounts from the outflow amounts shown in the table above and is included for illustrative purposes.

**Secured Net Cash Outflows**

GSBE funds inventory on a secured basis, through various secured funding transactions including repurchase agreements, securities loaned and other secured financings. In addition, GSBE provides financing to its clients for their securities trading activities, as well as securities lending and other prime brokerage services.

The liquidity standards consider outflows and inflows related to secured funding and securities services together as part of "Secured wholesale funding" and "Secured lending".

Specifically, under the liquidity standards, secured funding transactions include repurchase agreements, collateralized deposits, securities lending transactions and other secured wholesale funding arrangements. Secured lending transactions, as defined under the liquidity standards, include reverse repurchase transactions, margin loans, securities borrowing transactions and secured loans.

The standardized stress scenario prescribed in the liquidity standards applies outflow and inflow rates between 0-100% to secured funding and lending transactions. Specific outflow and inflow rates are based on factors such as the quality of the underlying collateral, as well as the type, tenor, and counterparty of a transaction.

The table below presents a summary of GSBE's NCOs related

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to its secured funding and lending activity, calculated in accordance with the liquidity standards.

**Table 36: Secured Net Cash Outflows**

€ in millions	Twelve Months Ended December 2023	
	Average Unweighted	Average Weighted
<b>Outflows</b>		
Secured wholesale funding		€ 4,090
<b>Inflows</b>		
Secured lending	€ 31,740	€ 1,737
<b>Net secured cash outflows/(inflows)</b>		<b>€ 2,353</b>

Net secured cash outflows/(inflows) reflects the subtraction of the inflow amounts from the outflow amount shown in the table above and is included for illustrative purposes.

## Derivatives

### Overview

Derivatives are instruments that derive their value from underlying asset prices, indices, reference rates and other inputs, or a combination of these factors. Derivatives may be traded on an exchange or they may be privately negotiated contracts, which are usually referred to as OTC derivatives. Certain OTC derivatives are cleared and settled through central clearing counterparties, while others are bilateral contracts between two counterparties.

The bank is exposed to derivative risk through:

- **Market-Making.** As a market maker, GSBE enters into derivative transactions to provide liquidity to clients and to facilitate the transfer and hedging of their risks. In this role, GSBE typically acts as principal and is required to commit capital to provide execution, and maintains market-making positions in response to, or in anticipation of, client demand.
- **Risk Management.** GSBE also enters into derivatives to actively manage risk exposures that arise from its market-making and investing and lending activities in derivative and cash instruments. The bank's holdings and exposures are hedged, in many cases, on either a portfolio or risk-specific basis, as opposed to an instrument-by-instrument basis. In addition, the bank may enter into derivatives that are used to manage interest rate exposure in certain fixed-rate unsecured long-term and short-term borrowings, and deposits.

GSBE enters into various types of derivatives, including futures, forwards, swaps and options.

### Derivative Net Cash Outflows

The liquidity standards require that derivative NCOs reflect outflows and inflows resulting from contractual settlements related to derivative transactions occurring over a 30 calendar-day period. These outflows and inflows can generally be netted at a counterparty level if subject to a valid qualifying master netting agreement. In addition, the liquidity standards require that NCOs reflect certain contingent outflows related to a bank's derivative positions that may arise during a 30 calendar-day stress scenario, including:

- Incremental collateral required as a result of a change in a bank's financial condition;
- Legal right of substitution of collateral posted to a bank for less liquid or non-HQLA collateral;
- Collateral required as a result of market movements.
- The liquidity standards require that a bank reflects in its NCOs calculation the absolute value of the largest net cumulative collateral outflow or inflow in a 30 calendar-day period over the last two years; and
- Excess collateral greater than the current collateral requirement under the governing contract that a bank may be contractually required to return to counterparty.

The table below presents a summary of the GSBE's derivative NCOs, calculated in accordance with the liquidity standards.

**Table 37: Derivative Net Cash Outflows**

€ in millions	Twelve Months Ended December 2023	
	Average Unweighted	Average Weighted
Outflows related to derivative exposures and other collateral requirements	€ 4,443	€ 4,419

## Unfunded Commitments

The liquidity standards apply outflow rates to the undrawn portion of committed credit and liquidity facilities that a bank has extended based on counterparty type and purpose. The undrawn portion is defined as the amount of the facility that could be drawn upon within 30 calendar days under the governing agreement, less the fair value of any liquid assets that serve as collateral, after recognising the applicable haircut for those assets. Commitments extended to non-financial sector corporates are prescribed an outflow rate of 10-30%, insurance sector entities an outflow rate of 40-100%, credit institutions an outflow rate of 40% and all others an outflow rate of 100%.

The table below presents a summary of GSBE's NCOs related to its unfunded commitments, calculated in accordance with the liquidity standards.

**Pillar 3 Disclosures****Table 38: Unfunded Commitments Net Cash Outflows**

€ in millions	Twelve Months Ended December 2023	
	Average Unweighted	Average Weighted
Credit and liquidity facilities	€ 6,877	€ 2,142

**Other Net Cash Outflows**

The table below presents a summary of GSBE's other cash outflows and inflows, including, but not limited to, overnight and term funding from parent and affiliate entities, derivative inflows, unsettled inventory balances, loans of collateral to effect customer short sales and other prime brokerage services.

**Table 39: Other Net Cash Outflows**

€ in millions	Twelve Months Ended December 2023	
	Average Unweighted	Average Weighted
<b>Outflows</b>	<b>€ 18,086</b>	<b>€ 8,838</b>
Other contractual obligations	17,123	8,096
Other contingent funding obligations	963	742
<b>Inflows</b>	<b>€ 7,746</b>	<b>€ 7,746</b>
Other cash inflows	7,746	7,746
<b>Net other cash outflows/(inflows)</b>	<b>€ 10,340</b>	<b>€ 1,092</b>

Net other cash outflows/(inflows) reflects the subtraction of the inflow amounts from the outflow amounts shown in the table above and is included for illustrative purposes.



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Table 40: EU LIQ1 - Liquidity Coverage Ratio Summary

Scope of consolidation (Consolidated)		Total Unweighted Value				Total Weighted Value			
Currency and units (€ in millions)									
Period ended		March 2023	June 2023	September 2023	December 2023	March 2023	June 2023	September 2023	December 2023
Number of data points used in the calculation of averages		12	12	12	12	12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>									
1	Total high-quality liquid assets (HQLA)					€ 20,190	€ 20,331	€ 20,165	€ 19,903
<b>CASH – OUTFLOWS</b>									
2	Retail deposits and deposits from small business customers, of which:	1,285	1,541	1,867	2,144	215	256	309	353
3	Stable deposits	0	0	0	0	0	0	0	0
4	Less stable deposits	1,285	1,528	1,839	2,092	215	256	309	353
5	Unsecured wholesale funding	3,286	3,902	4,649	5,334	1,637	1,891	2,218	2,521
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	1	5	9	11	0	1	2	3
7	Non-operational deposits (all counterparties)	3,119	3,737	4,473	5,151	1,471	1,730	2,050	2,346
8	Unsecured debt	166	160	167	172	166	160	167	172
9	Secured wholesale funding					3,283	3,527	3,789	4,090
10	Additional requirements	11,753	11,871	11,557	11,320	7,178	7,267	6,891	6,561
11	Outflows related to derivative exposures and other collateral requirements	5,001	5,330	4,875	4,443	4,974	5,323	4,862	4,419
12	Outflows related to loss of funding on debt products	0	0	0	0	0	0	0	0
13	Credit and liquidity facilities	6,752	6,540	6,682	6,877	2,204	1,944	2,029	2,142
14	Other contractual funding obligations	16,824	17,908	17,391	17,123	10,275	10,377	9,057	8,096
15	Other contingent funding obligations	1,235	1,208	951	963	1,025	988	760	742
16	TOTAL CASH OUTFLOWS					€ 23,613	€ 24,306	€ 23,024	€ 22,363
<b>CASH – INFLOWS</b>									
17	Secured lending (e.g. reverse repos)	28,492	31,133	31,405	31,740	2,039	1,846	1,744	1,737
18	Inflows from fully performing exposures	366	633	740	865	47	49	171	290
19	Other cash inflows	8,367	8,388	7,814	7,746	8,367	8,388	7,814	7,746
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution)					0	0	0	0
20	TOTAL CASH INFLOWS	€ 37,225	€ 40,154	€ 39,959	€ 40,351	€ 10,453	€ 10,283	€ 9,729	€ 9,773
EU-20a	Fully exempt inflows	0	0	0	0	0	0	0	0
EU-20b	Inflows Subject to 90% Cap	0	0	0	0	0	0	0	0
EU-20c	Inflows Subject to 75% Cap	37,225	40,154	39,958	40,337	10,453	10,283	9,729	9,773
<b>TOTAL ADJUSTED VALUE</b>									
21	LIQUIDITY BUFFER					€ 20,190	€ 20,331	€ 20,165	€ 19,903
22	TOTAL NET CASH OUTFLOWS					€ 13,160	€ 14,023	€ 13,296	€ 12,591
23	LIQUIDITY COVERAGE RATIO (%)					157.0%	145.0%	154.0%	161.0%

## Net Stable Funding Ratio

The Net Stable Funding Ratio (NSFR) is designed to promote medium and long-term stable funding of the assets and off-balance sheet activities over a one-year time horizon.

The NSFR is defined as the regulatory measurement of the bank's available stable funding ("ASF") against its asset funding needs, or required stable funding ("RSF"), over a one-year time horizon.

The ASF is calculated as the sum of carrying values of the firm's liabilities and regulatory capital, each multiplied by a standardised weighting ranging from zero to 100 percent to reflect the relative stability of such liabilities and capital over a one-year time horizon.

The RSF is calculated as: (1) the sum of the carrying value of assets, each multiplied by a standardized weight ranging from zero to 100 percent to reflect the relative need for funding over a one-year time horizon based on the liquidity characteristics of the asset, plus (2) RSF amounts based on the firm's committed facilities and derivative exposures.

The bank is subject to the applicable NSFR requirement in the E.U., which became effective in June 2021 and requires the bank to maintain an NSFR of 100%. As of December 2023, the bank's NSFR exceeded the regulatory minimum requirement. See tables 41a, 41b, 41c, 41d for more detail.

## Pillar 3 Disclosures

Table 41a: EU LIQ2 - Net Stable Funding Ratio

		As of December 2023				Weighted value
		a	b	c	d	
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
<b>AVAILABLE STABLE FUNDING (ASF) ITEMS</b>						
1	<b>Capital items and instruments</b>	€ 12,984	-	-	€ 20	€ 13,004
2	Own funds *	12,984	-	-	20	13,004
3	Other capital instruments		-	-	-	-
4	<b>Retail deposits</b>		2,509	4		2,262
5	Stable deposits		-	-	-	-
6	Less stable deposits		2,509	4	-	2,262
7	<b>Wholesale funding:</b>		23,800	1,114	9,303	12,919
8	Operational deposits		7	-	-	3
9	Other wholesale funding		23,793	1,114	9,303	12,915
10	<b>Interdependent liabilities</b>		1,574	-	-	-
11	<b>Other liabilities:</b>	-	25,259	-	-	-
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		25,259	-	-	-
14	<b>TOTAL AVAILABLE STABLE FUNDING (ASF)</b>					€ 28,185
<b>REQUIRED STABLE FUNDING (RSF) ITEMS</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					€ 820
EU-15a	<b>Assets encumbered for a residual maturity of one year or more in a cover pool</b>		-	-	-	-
16	<b>Deposits held at other financial institutions for operational purposes</b>		282	-	-	141
17	<b>Performing loans and securities:</b>		15,379	276	11,702	10,831
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		11,293	-	-	45
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		3,349	262	939	1,259
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		615	6	1,422	1,519
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		-	-	-	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		122	9	9,341	8,009
25	<b>Interdependent assets</b>		1,574	-	-	-
26	<b>Other assets:</b>		25,699	14	7,800	9,014
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		86	-	3,838	3,336
29	NSFR derivative assets		423			423
30	NSFR derivative liabilities before deduction of variation margin posted		24,963			1,248
31	All other assets not included in the above categories		227	14	3,962	4,007
32	<b>Off-balance sheet items</b>		27,557	1	-	365
33	<b>TOTAL RSF</b>					€ 21,171
34	<b>NET STABLE FUNDING RATIO (%)</b>					133.13%

\* Own funds in Row 2 of the table above for NSFR purposes corresponds to regulatory capital before any regulatory adjustments (Refer to table EU CC1, Row 6)

## Pillar 3 Disclosures

Table 41b: EU LIQ2 - Net Stable Funding Ratio

€ in millions		As of September 2023				
		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
<b>AVAILABLE STABLE FUNDING (ASF) ITEMS</b>						
1	<b>Capital items and instruments</b>	€ 12,288	-	-	€ 20	€ 12,308
2	Own funds	12,288	-	-	20	12,308
3	Other capital instruments		-	-	-	-
4	<b>Retail deposits</b>		2,486	6	-	2,243
5	Stable deposits		-	-	-	-
6	Less stable deposits		2,486	6	-	2,243
7	<b>Wholesale funding:</b>		30,034	765	9,770	13,235
8	Operational deposits		14	-	-	7
9	Other wholesale funding		30,019	765	9,770	13,228
10	<b>Interdependent liabilities</b>		1,782	-	-	-
11	<b>Other liabilities:</b>	-	29,321	-	-	-
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		29,321	-	-	-
14	<b>TOTAL AVAILABLE STABLE FUNDING (ASF)</b>					€ 27,786
<b>REQUIRED STABLE FUNDING (RSF) ITEMS</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					€ 292
EU-15a	<b>Assets encumbered for a residual maturity of one year or more in a cover pool</b>		-	-	-	-
16	<b>Deposits held at other financial institutions for operational purposes</b>		416	-	-	208
17	<b>Performing loans and securities:</b>		19,116	312	8,346	8,207
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		15,017	-	-	185
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		3,430	166	1,535	1,824
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		596	123	1,497	1,632
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		-	-	-	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		72	23	5,315	4,566
25	<b>Interdependent assets</b>		1,782	-	-	-
26	<b>Other assets:</b>		22,533	-	10,331	10,919
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		24	-	4,373	3,737
29	NSFR derivative assets		60			60
30	NSFR derivative liabilities before deduction of variation margin posted		22,140			1,107
31	All other assets not included in the above categories		309	-	5,959	6,015
32	<b>Off-balance sheet items</b>		29,055	-	-	362
33	<b>TOTAL RSF</b>					€ 19,987
34	<b>NET STABLE FUNDING RATIO (%)</b>					139.00%

## Pillar 3 Disclosures

Table 41c: EU LIQ2 - Net Stable Funding Ratio

€ in millions		As of June 2023				
		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
<b>AVAILABLE STABLE FUNDING (ASF) ITEMS</b>						
1	<b>Capital items and instruments</b>	€ 12,287	-	-	€ 20	€ 12,307
2	Own funds	12,287	-	-	20	12,307
3	Other capital instruments		-	-	-	-
4	<b>Retail deposits</b>		2,145	27	-	1,955
5	Stable deposits		-	-	-	-
6	Less stable deposits		2,145	27	-	1,955
7	<b>Wholesale funding:</b>		23,227	1,319	5,910	9,325
8	Operational deposits		14	-	-	7
9	Other wholesale funding		23,213	1,319	5,910	9,317
10	<b>Interdependent liabilities</b>		1,552	-	-	-
11	<b>Other liabilities:</b>	-	27,005	-	-	-
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		27,005	-	-	-
14	<b>TOTAL AVAILABLE STABLE FUNDING (ASF)</b>					€ 23,586
<b>REQUIRED STABLE FUNDING (RSF) ITEMS</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					€ 172
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		437	-	-	218
17	<b>Performing loans and securities:</b>		13,679	916	6,982	7,272
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		10,251	589	-	443
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		2,809	230	1,691	1,973
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		557	51	1,487	1,567
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		-	-	-	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		62	46	3,804	3,288
25	<b>Interdependent assets</b>		1,552	-	-	-
26	<b>Other assets:</b>		21,510	-	8,618	9,333
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		19	-	3,157	2,699
29	NSFR derivative assets		82			82
30	NSFR derivative liabilities before deduction of variation margin posted		21,193			1,060
31	All other assets not included in the above categories		217	-	5,461	5,493
32	<b>Off-balance sheet items</b>		10,424	6	-	360
33	<b>TOTAL RSF</b>					€ 17,356
34	<b>NET STABLE FUNDING RATIO (%)</b>					135.89%

## Pillar 3 Disclosures

Table 41d: EU LIQ2 - Net Stable Funding Ratio

€ in millions		As of March 2023				
		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
<b>AVAILABLE STABLE FUNDING (ASF) ITEMS</b>						
1	<b>Capital items and instruments</b>	€ 12,288	-	-	€ 20	€ 12,308
2	Own funds	12,288	-	-	20	12,308
3	Other capital instruments		-	-	-	-
4	<b>Retail deposits</b>		1,754	5	-	1,583
5	Stable deposits		-	-	-	-
6	Less stable deposits		1,754	5	-	1,583
7	Wholesale funding:		27,301	1,387	8,420	11,358
8	Operational deposits		8	-	-	4
9	Other wholesale funding		27,293	1,387	8,420	11,354
10	<b>Interdependent liabilities</b>		1,729	-	-	-
11	<b>Other liabilities:</b>	-	27,000	-	-	-
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		27,000	-	-	-
14	<b>TOTAL AVAILABLE STABLE FUNDING (ASF)</b>					€ 25,249
<b>REQUIRED STABLE FUNDING (RSF) ITEMS</b>						
15	<b>Total high-quality liquid assets (HQLA)</b>					658
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		365	-	-	182
17	<b>Performing loans and securities:</b>		21,457	390	7,123	6,972
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		17,786	291	-	257
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		3,039	42	678	893
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		543	47	884	1,046
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		-	-	-	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		89	10	5,561	4,777
25	<b>Interdependent assets</b>		1,729	-	-	-
26	<b>Other assets:</b>		26,679	1	8,588	10,167
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		5	-	2,990	2,546
29	NSFR derivative assets		715			715
30	NSFR derivative liabilities before deduction of variation margin posted		25,280			1,264
31	All other assets not included in the above categories		678	1	5,598	5,642
32	<b>Off-balance sheet items</b>		9,043	5	2	312
33	<b>TOTAL RSF</b>					€ 18,292
34	<b>NET STABLE FUNDING RATIO (%)</b>					138.00%

## Asset Encumbrance

### Overview

Asset encumbrance refers to the pledging or use of an asset as a means to secure, collateralise or credit-enhance any on-balance-sheet or off-balance-sheet transaction from which it cannot be freely withdrawn. The majority of the encumbrance in GSBE is driven by derivatives and secured funding activity. A portion of the bank's assets are encumbered in currencies other than Euros. Asset encumbrance is an integral part of GSBE's liquidity, funding, and collateral management process.

The tables in this section identify components of GSBE's encumbered and unencumbered assets for the period ended December 31, 2023. Median values are computed over the preceding 4 quarterly data points. This disclosure is being made in accordance with the format outlined in CRR.

**Table 42: EU AE1 - Encumbered and Unencumbered Assets**

€ in millions	Carrying Amount of Encumbered Assets		Fair Value of Encumbered Assets		Carrying Amount of Unencumbered Assets		Fair Value of Unencumbered Assets	
		Of which notionally eligible EHQLA <sup>1</sup> and HQLA		Of which notionally eligible EHQLA <sup>1</sup> and HQLA		Of which notionally eligible EHQLA <sup>1</sup> and HQLA		Of which notionally eligible EHQLA <sup>1</sup> and HQLA
<b>Assets of the Reporting Institution</b>	<b>€ 35,717</b>	<b>€ 10,500</b>	<b>N/A<sup>2</sup></b>	<b>N/A<sup>2</sup></b>	<b>€ 233,685</b>	<b>€ 15,354</b>	<b>N/A<sup>2</sup></b>	<b>N/A<sup>2</sup></b>

<sup>1</sup> Liquidity standards define Level 1 assets as extremely high liquidity and credit quality (EHQLA) and Level 2 assets as assets of high liquidity and credit quality (HQLA)

<sup>2</sup> Cells are marked N/A to indicate those components which are not reportable under EBA Guidelines

**Table 43: EU AE1 - Components of Encumbered and Unencumbered Assets<sup>3</sup>**

€ in millions	Carrying Amount of Encumbered Assets		Fair Value of Encumbered Assets		Carrying Amount of Unencumbered assets		Fair Value of Unencumbered Assets	
		Of which notionally eligible EHQLA and HQLA		Of which notionally eligible EHQLA and HQLA		Of which notionally eligible EHQLA and HQLA		Of which notionally eligible EHQLA and HQLA
<b>Equity Instruments<sup>5</sup></b>	<b>€ 2,114</b>	<b>€ 598</b>	<b>€ 2,114</b>	<b>€ 598</b>	<b>€ 2,843</b>	<b>€ 167</b>	<b>€ 2,843</b>	<b>€ 167</b>
<b>Debt Securities<sup>5</sup></b>	<b>€ 11,059</b>	<b>€ 9,998</b>	<b>€ 11,059</b>	<b>€ 9,998</b>	<b>€ 1,593</b>	<b>€ 785</b>	<b>€ 1,593</b>	<b>€ 785</b>
of which: covered bonds	393	-	393	-	16	-	16	-
of which: asset-backed securities	-	-	-	-	-	-	-	-
of which: issued by general governments	9,509	9,215	9,509	9,215	1,171	583	1,171	583
of which: issued by financial corporations	1,390	-	1,309	-	178	-	178	-
of which: issued by non-financial corporations	-	740	-	740	306	78	306	78
<b>Other Assets</b>	<b>€ 23,521</b>	<b>-</b>	<b>N/A<sup>4</sup></b>	<b>N/A<sup>4</sup></b>	<b>€ 288,293</b>	<b>€ 14,353</b>	<b>N/A<sup>4</sup></b>	<b>N/A<sup>4</sup></b>

<sup>3</sup>The figures in Table 43 are a subset of Assets of the Reporting Institution in Table 42

<sup>4</sup> Cells are marked N/A to indicate those components which are not reportable under EBA Guidelines

<sup>5</sup> Fair value is the same as carrying value for Debt Securities and Equity Instruments

<sup>6</sup> The majority of unencumbered Other Assets relate to derivative instruments.

## Pillar 3 Disclosures

The bank receives securities collateral in respect of securities purchased under agreement to resell, secured borrowings, margin loans and derivatives. The tables below break down securities collateral received into the portion which has been treated as encumbered and the portion which is available for encumbrance.

Table 44: EU AE2 - Collateral Received

€ in millions	Fair Value of Encumbered Collateral Received or Own Debt Securities Issued		Fair Value of Collateral Received or Own Debt Securities Issued Available for Encumbrance	
		Of which notionally eligible EHQLA and HQLA		Of which notionally eligible EHQLA and HQLA
<b>Collateral Received by the Reporting Institution<sup>1</sup></b>	<b>€ 40,796</b>	<b>€ 35,243</b>	<b>€ 3,919</b>	<b>€ 3,311</b>

<sup>1</sup>Collateral Received by GSBE does not include cash collateral which is included as an on-balance-sheet asset in Tables 42 and 43

Table 45: EU AE2 - Components of Collateral Received<sup>2</sup>

€ in millions	Fair Value of Encumbered Collateral Received or Own Debt Securities Issued		Fair Value of Collateral Received or Own Debt Securities Issued Available for Encumbrance	
		Of which notionally eligible EHQLA and HQLA		Of which notionally eligible EHQLA and HQLA
<b>Loans on Demand</b>	-	-	-	-
<b>Equity Instruments</b>	<b>€ 3,790</b>	<b>€ 702</b>	<b>€ 361</b>	<b>€ 44</b>
<b>Debt Securities</b>	<b>€ 36,778</b>	<b>€ 34,519</b>	<b>€ 3,423</b>	<b>€ 3,258</b>
of which: covered bonds	123	-	2	-
of which: asset-backed securities	-	-	-	-
of which: issued by general governments	34,484	33,425	3,248	3,234
of which: issued by financial corporations <sup>3</sup>	-	-	-	-
of which: issued by non-financial corporations	2,371	1,100	150	29
<b>Loans and advances other than loans on demand</b>	-	-	<b>€ 21</b>	-
<b>Other Collateral Received</b>	<b>€ 144</b>	-	<b>€ 6</b>	-
<b>Own Debt Securities Issued other than Own Covered Bonds or ABSs</b>	-	-	-	-
<b>Own Covered Bonds and Asset-Backed Securities issued and not yet pledged</b>	<b>N/A<sup>4</sup></b>	<b>N/A<sup>4</sup></b>	-	-
<b>Total Assets, Collateral received and Own Debt Securities Issued</b>	<b>€ 77,786</b>	<b>€ 44,554</b>	<b>N/A<sup>4</sup></b>	<b>N/A<sup>4</sup></b>

<sup>2</sup>The figures shown in Table 45 are a subset of Collateral Received by the Reporting Institution in Table 44

<sup>3</sup>HQLA balances reported in this row mainly comprise of securities issued by Multinational Development Banks and Public Sector Enterprises

<sup>4</sup>Cells are marked N/A to indicate those components which are not reportable under EBA Guidelines



**Pillar 3 Disclosures**

The table below shows the extent to which liabilities have been matched to encumbered assets.

**Table 46: EU AE3 - Sources of Encumbrance**

<i>€ in millions</i>	<b>Matching Liabilities, Contingent Liabilities or Securities Lent</b>	<b>Assets, Collateral Received and Own Debt Securities Issued other than Covered Bonds and ABSs Encumbered</b>
<b>Carrying amount of selected financial liabilities<sup>5</sup></b>	<b>€ 212,135</b>	<b>€ 62,396</b>

<sup>5</sup>There may be a mismatch between liabilities and encumbered assets and collateral received driven by the accounting standard presentation of derivatives

**Commentary**

In the above Asset Encumbrance disclosure, derivative instruments are reported in accordance with the applicable accounting standard. In addition, total assets include collateralised lending where the receivable is reported as a balance sheet asset in Tables 42 and 43 and the underlying collateral received is reported in Tables 44 and 45 resulting in double counting of these assets.

GSBE primarily adopts standard collateral agreements and collateralises based on industry standard contractual agreements (mostly Deutscher Rahmenvertrag für Finanztermingeschäfte (DRV), Credit Support Annexes (CSA) and Global Master Repurchase Agreements (GMRAs)). The rights and obligations on collateral posted to counterparties for derivatives are dependent on the counterparty and the nature and jurisdiction of the CSA. Derivative liabilities are collateralised primarily using G10 currencies and government bonds.

## Climate Risk

### Overview

Climate risk is the risk of adverse outcomes arising from the long and/or short-term impacts of climate change. GSBE categorizes climate risk into physical risk and transition risk. Physical risk is the risk that asset values may decline as a result of changes in the climate, while transition risk is the risk that asset values may decline because of changes in climate policies or changes in the underlying economy due to de-carbonisation.

Informed by the results of the bank's risk identification process, GSBE has developed and implemented methodologies for both physical and transition risk, to assess the potential impact of climate-related and environmental (C&E) risks and perform scenario analysis to identify vulnerabilities and risks. This foundation of quantification propels robust integration of climate-related risk into relevant risk management processes and transaction considerations.

**Physical Risk.** In both the bank's physical and transition risk scenario analysis, GSBE leverages open-source data and models used by the scientific and climate policy communities. For physical risk scenario analysis, GSBE employs a combination of open-source General Circulation Models (GCMs), meteorological variable projections, publicly available local historical data and internal hazard severity projection methodologies to project how climate variables may evolve over time at different geographical locations for GSBE. The bank has developed a climate scoring approach for a number of significant physical risks, such as flooding, water stress, wildfire, etc. For each of these physical climate risk indices, and based on the chosen scenario, the bank is able to quantify physical risk stress loss of the relevant assets in GSBE's portfolio. The bank continues to monitor the severity of impacts to ensure GSBE's resiliency.

GSBE analyse concentrations of commercial real estate loan exposure, residential loans and real estate investments in cities with extremely high physical risk as projected under the climate change scenarios. Also, the bank recognises that through our own operational footprint in the EU, foreign branch offices, and GS service entities across the world, GSBE may have exposure to physical risk. The bank monitors its people and buildings closely to ensure efficient cooling systems and appropriate infrastructure are in place.

**Transition Risk.** Transition risk emerges from policy, legal,

technology and market changes resulting from the shift to a lower carbon economy. For example, under certain scenarios that implement new policies and regulations supportive of the Paris Agreement, carbon-intensive sectors may suffer from transition risk especially as the market experiences changed preferences. In GSBE's transition risk scenario analysis, the bank uses scenario-specific variable pathways sourced from Network for Greening the Financial System (NGFS) scenario suite and utilized in an internally developed factor-based model. NGFS scenarios leverage are open-source models used by the climate policy community, which align with industry best-practices for transition risk.

GSBE project the effects of climate policy changes from a base case to other more stringent climate policy scenarios. As a result, the bank model transition risk by generating risk factor shocks such as equity shocks, credit spread shocks and credit rating shocks by country and by industry under different climate policy scenarios. Once shocks have been developed, GSBE applies them to relevant portfolios to produce stress tests and assess impacts.

Under the current approach, GSBE has estimated the magnitude of potential losses in equity investments and wholesale loans across climate scenario pathways. These estimates assume that changes in climate policies have an immediate impact on market prices and related economic and market variables. GSBE actively monitor the estimated loss impact from transition risk to the bank but deem the impact to be currently non-material for the entity. The bank continues to refine our estimates and methodologies as the industry and regulatory landscape evolve.

**Risk Identification and Appetite.** Risk discovery is based on top-down, greenhouse gas emission pathways, and bottom-up processes, portfolio-aligned loan level analysis. The bank identifies risks, assesses materiality through scenario analysis and stress testing, integrates considerations into transaction and risk management decisions, and continues to evaluate impacts during ongoing monitoring. Based on our findings and as industry-wide capabilities, including data availability, advance the bank is continuously evaluating relevant enhancements to our approach.

GSBE evaluates multiple scenarios which consider macroeconomic assumptions to understand the potential range of impacts. The scenarios, with varying

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implementation dates of policy changes and probabilities of temperature change, provide insight into the financial risks that may arise. A key component of GSBE's climate-related and environmental risk program has included establishing Risk Appetite Statement (RAS) thresholds on the financial risks generated by physical risk and transition risk. Through scenario analysis and risk appetite, GSBE monitors the results of physical and transition risk to understand the materiality of its most exposed portfolios. GSBE continues to enhance climate risk assessments through developing versatile stress testing capabilities and integrating considerations of the broader climate-related framework at relevant stages of the transaction underwriting process.

In the assessment of the bank's climate risk drivers and their transmission channels, GSBE also recognize the importance of categorizing climate risks and their integration into our existing risk practices across risk categories (credit, market, liquidity, operational) and have integrated climate change into risk management processes and procedures.

**Climate Risk Integration.** For GSBE, climate-related risks manifest in different ways across our business. GSBE has continued to make significant enhancements to the bank climate risk management framework, including steps to further integrate climate risk into our broader entity risk management processes.

Broadly, GSBE has processes in place to assess materiality of climate-related and environmental risk per risk category. As follows, we detail how climate-related and environmental risks are assessed and managed across categories.

- **Credit Risk:** incorporates climate risk into credit evaluations and underwriting processes for select industries and in select loan commitments.
- **Market Risk:** considers climate-related and environmental impacts in the firm's equity investments through the current physical climate risk assessment performed as a part of transaction due diligence. In addition, GSBE is further developing capabilities to stress market risk factors using climate risk scenarios for select sectors subject to high transition risk. To this regard, the bank is conducting preliminary materiality analysis of physical and transition risk on GSBE trading book positions and evaluating outcomes. The bank is committed to continue enhancing climate risk

quantification methodologies.

- **Operational Risk:** The Environmental Risk unit reviews physical climate risk data for equity and credit investments in real estate transactions, including those relating to GSBE, and instructs the business to evaluate mitigants for transactions with high risk factors, including for biodiversity and broader environmental risks. Also, the Operational Risk team conducts comprehensive assessments to identify, measure, and mitigate potential operational risks stemming from various sources, including climate related and external events. To this regard, no Climate risk related Operational Risk incidents - nor any complaints, have been recorded during 2023.
- **Liquidity Risk:** uses climate scenario analysis to quantitatively assess the impact of transition risk on the GSBE's liquidity. This climate scenario analysis assessment specifically measures the liquidity impacts in a scenario where government policy changes result in more expensive access to capital markets for high emission intensity companies. In this high transition risk scenario, the reduced access to capital markets leads to increased reliance on funding from GSBE, including revolver draws and withdrawal of deposits, resulting in liquidity outflows<sup>1</sup>.

**Second Line Integration. Credit Risk Spotlight.** For a counterparty within a high-emitting sector and meeting the eligibility criteria, Credit Risk analyses the company's ability to mitigate the risk associated with their transition to a low-carbon economy. Credit Risk assesses the counterparty's disclosures and available public statements on emission reduction targets and assigns an appropriate mitigation score. This score is incorporated into the overall credit rating of the counterparty.

**First Line Integration.** A significant focus of the bank's climate risk management program is appropriate integration in our first line business strategy. The firm, including GSBE, incorporates climate-related and environmental risk assessments in select transaction underwriting decisions and continues to further strengthen business adoption of climate-related and environmental risk management. The bank upfront business selection and due diligence processes include sector and geographical guidelines and are overseen through designated committee review processes. Enhanced

<sup>1</sup> Due to a lack of historical climate-specific liquidity stress periods, the stress outflow calibration incorporates management judgment and is informed by the relative severity of non-climate specific liquidity stress periods.

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considerations for assessing climate-related and environmental risk during underwriting have been established, including a dedicated section to document physical and transition risk exposure and potential mitigation within select investment committee reporting. Targeted trainings have been conducted with teams most frequently impacted by these changes, and we continue to enhance ongoing monitoring.

Consistent with the firmwide governance structure from senior management to the GS Group Board and its committees, including the Risk Committee of the Board and Public Responsibilities Committee of the Board, we have integrated oversight of climate-related risks into GSBE's risk management governance structure. This includes oversight by the bank's Executive Board and Risk Committee. These governing and management bodies regularly receive reporting of climate risk appetite metrics and updates on our risk management approach to climate risk, as the firm continues to enhance its framework. In general, GSBE is integrated into and thereby benefits from the broader firmwide risk management and control framework supporting climate change risk management commensurate with the bank's activities. As of December 2023, climate change related risks were identified as relevant but based on the quantification analysis and risk category (credit, market, liquidity, operational) assessments, they have been assessed as non-material risks to GSBE.

In accordance with Regulation (EU) 2019/2088 (the "Sustainable Finance Disclosure Regulation" or "SFDR"), a Statement on Principal Adverse Impacts of Investment Decisions on Sustainability Factors is published annually for GSBE's in-scope Investment Management business, see <https://www.goldmansachs.com/disclosures/gsbank-europe-se-disclosures.html> for more information.

## **Governance Arrangements**

GSBE is managed by its Executive Board under its own responsibility. The Executive Board carries the full responsibility for the management of the bank in accordance with the German Stock Corporation Act. Its members are appointed and dismissed by the Supervisory Board, an independent body.

### **Recruitment and Diversity Policy**

As part of the Goldman Sachs Group, GSBE implements the global principles, measures, and goals for diversity at Goldman Sachs.

In the selection of the members of the Executive Board and Supervisory Board, a candidate for each role is considered when, in addition to the actual knowledge, capabilities and experience required by regulations, professional and personal competence of the candidates is also demonstrated. GSBE thereby places the highest requirements on persons who are considered for selection.

GSBE considers diversity to be a priority for the bank and is committed to promoting the participation of qualified women in leadership positions. Female and male candidates are given equal consideration.

As of December 2023, in accordance with the GSBE Diversity Policy, GSBE has a target to have at least 40% women representation on the Supervisory Board and at least 15% women representation on the Executive Board with the aspirational goal to increase women representation on the Executive Board to 25% over time. As of December 31, 2023, female members comprised 37.5% of the Supervisory Board and 12.5% of the Executive Board.

We have set out below the biographies of the members of the Executive Board and the Supervisory Board as of December 31, 2023, together with the positions and number of directorships they held at that date, including those with other Goldman Sachs affiliates.

### **Risk Committee**

The Supervisory Board has established the Audit Committee, Risk Committee, Remuneration Committee and Nomination Committee to the Supervisory Board for the purpose of advising and supporting the Supervisory Board in fulfilling its duties and responsibilities.

The Supervisory Board Risk Committee is responsible for providing advice to the Supervisory Board on GSBE's current and future risk appetite and is assisting the Supervisory Board in overseeing the implementation of that risk appetite and strategy by the Executive Board. The Risk Committee meets at least four times a year although meetings may occur more frequently as necessary to enable the Risk Committee to perform its functions.

### **Description of the information flow on risk to the management body**

For a description of the information flow on risk to the management body please refer to Risk Management section of this document.

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Table 47a: GSBE Executive Board of Directors

Name	Background	Directorships
Dr. Fink	Wolfgang Fink is the chief executive officer of GSBE, having joined the Executive Board in April 2015. He is responsible for GSBE's Investment Banking, Asset Management and Transaction Banking businesses and its Executive Office. In addition, he is a member of the European Management Committee and the head of Goldman Sachs in Germany and Austria. Dr. Fink also serves as a board member of the German Banking Association, Deutsches Aktieninstitut, American institute for contemporary German studies, African Parks Deutschland Stiftung and as an advisory board member of Foerderverein fuer das Festival Theater der Welt. He joined Goldman Sachs in Mergers and Acquisitions in London in 1993 and later worked in the Principal Investment Area. He subsequently, from 2006, served as the co-head of Investment Banking for Russia and Central and Eastern Europe before heading the European Industrials Group in Investment Banking. Dr. Fink was named managing director in 2004 and partner in 2008. Dr. Fink earned a MSc from Vienna University and a PhD in Economics from the European Business School.	1
P. Hermann	Peter Hermann has joined the Executive Board in August 2021, responsible for GSBE's FICC and Equities Sales, Private Wealth Management and Global Investment Research businesses. In addition to his role as the co-head of GSBE's FICC and Equities, he serves as the co-head of the Nordic Region, including managing the firm's presence in Denmark, Finland, Norway and Sweden. Mr. Hermann is the branch manager of the GSBE Copenhagen branch. He is also a member of the EMEA Conduct Committee. Prior to his current role, Mr. Hermann was the head of the European Pension and Insurance Strategy Group. He joined the firm in 2009 and was named managing director in 2012 and partner in 2016. Mr. Hermann earned a MSc in Economics and Finance from the Aarhus University in 2002.	1
R. Charnley	Robert Charnley is the chief administrative officer of GSBE, having joined the Executive Board in April 2023. He is responsible for GSBE's Compliance and Financial Crime Compliance functions. Mr. Charnley is also global head of the Business Intelligence Group, co-chair of the EMEA Conduct Committee, as well as the EMEA and APAC Regional Vetting groups. Mr. Charnley is also a member of various GS committees including GSBE's Risk Committee, the Firmwide Conduct Committee, the Firmwide Sustainability Committee and the Regulatory Remediation Committee. Prior to assuming his current role, Mr. Charnley served as co-head of EMEA Compliance. Before that, he was head of the Regulatory Reporting and New Products department in Controllers with responsibility for Europe and Asia. Mr. Charnley joined Goldman Sachs in 1993 as an associate in the Management Controls Department and transferred to Controllers in 1994. He was named managing director in 2004 and partner in 2022. Prior to joining the firm, Mr. Charnley worked as a regulator with the London Stock Exchange and with the UK Securities and Futures Authority. He earned a bachelor's degree in law from Kings College, London, in 1987.	1
L. Janiv	Lear Janiv has joined the Executive Board in October 2023, becoming responsible there for GSBE's FICC and Equities Trading. In addition, Mr. Janiv manages exotics trading and contingent liquidity solutions for the EMEA interest rate products (IRP) trading business. He is also responsible for supervising Credit Valuation Adjustment (XVA) trading within the IRP business. Mr. Janiv is a member of the OTCDerivnet board and is a managing director sponsor for Women in Trading. Prior to his current role, he managed EMEA XVA trading. Mr. Janiv joined Goldman Sachs in 2007 as an analyst, was named managing director in 2015 and partner in 2022. He earned a BA in Astrophysics from Princeton University in 2007.	1
T. Degn-Petersen	Thomas Degn-Petersen is the chief operating officer of GSBE, having joined the Executive Board in March 2018. He is responsible for GSBE's Operations, Human Capital Management, Engineering, Internal Audit, Third Party Risk Management, Corporate and Workplace Solutions and Cross-Divisional Projects. He is also a member of the board of Goldman Sachs Poland Services Sp. z.o.o., and a non-executive director of Goldman Sachs Saudi Arabia. In addition, Mr. Degn-Petersen is a member of various GS committees including the GSBE Operational Risk and Resilience Committee, the GSBE Risk Committee, GSBE Asset and Liability Committee, the EMEA Operational Risk and Resilience Committee and the Goldman Sachs Bank USA ("GS Bank") Management Committee. He is also a member of the International Banking Committee of the German Banking Association. Previously, Mr. Degn-Petersen was the co-head of Controllers in India and the global head of the Shared Services Management office from 2014 to 2018. Prior to that, in the period from 2007 to 2013, he served as the head of Finance and from 2009 as the head of the Federation of OOOGSB in Russia. He is a qualified accountant and a member of the Chartered Institute of Management Accountants. Mr. Degn-Petersen earned a BSc (Hons) in Management Studies from the University of Surrey in 1996.	1
M. Holmes	Michael Holmes is the chief financial officer of GSBE, having joined the Executive Board in May 2022. Mr. Holmes is responsible for GSBE's Controllers, Corporate Treasury and Tax. He is also the chair of the board of OOO Goldman Sachs Bank ("OOOGSB"), and a non-executive director of Goldman Sachs Realty Management Europe GmbH and Goldman Sachs International Service Entities Holdings Ltd. In addition, Mr. Holmes is a member of the GS Bank Risk and Asset Liability Committee, the GSBE Risk Committee and he co-chairs the GSBE Asset and Liability Committee and the GSBE Recovery and Resolution Steering Group. Mr. Holmes has held various senior positions in GS's Controllers and Financial Reporting teams. From 2013 to 2022 he was a managing director at GSI and served as Legal Entity Controller with oversight of other EMEA Financial Reporting teams. He gained professional experience in the DACH region as Head of Operations, Finance, Technology and Services (OFT&S) at Goldman Sachs Bank AG, Zurich from 2011 to 2013 and as Regional Controller at Goldman Sachs and Co. OHG, Frankfurt from 2001 to 2004. He earned a BA (Hons) and a MMath in Mathematics from the University of Cambridge in 1992 and 1996 respectively and an ACA from the Institute of Chartered Accountants in England and Wales in 1997.	1
Dr. Bock <sup>2</sup>	Matthias Bock joined the Executive Board in July 2011 and is the general counsel of GSBE, responsible for Legal. He is a board member and a deputy chairman of the regional banking Association of Banks Mitte and holds different positions within the German Banking Association (the chairman of its Committee for Foreign Banks, a member of its Legal Committee). He also serves on the board of the Bernhard-Vogel foundation ( <i>Kuratorium</i> ) and of the Civitas-Bernhard-Vogel foundation ( <i>Beirat</i> ). Dr. Bock joined Goldman Sachs in 1999 in London and transferred to Frankfurt in 2007. He studied in Heidelberg (First State Exam 1992), Hamburg (Second State Exam and Dr. iur. 1995) and at the University of Chicago (LLM 1996). He is admitted to the New York Bar.	1

<sup>2</sup> Mr. Bock stepped down from his role as GSBE Executive Board member with the expiry of December 31, 2023. He continues to serve as GSBE's general counsel.

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H. Lo <sup>3</sup>	Hei Man Lo is the chief risk officer of GSBE, having joined the Executive Board in November 2021. Ms. Lo also has a senior oversight responsibility as Credit Risk Officer for the EMEA region. She is a member of various GS committees, including GSBE Risk Committee (chair), GSBE Asset and Liability Committee and the GS Bank Risk and Asset Liability Committee. Ms. Lo also serves as an ambassador of the Asian Network Steering Committee. She joined Goldman Sachs in 2010 as an executive director in the Credit Risk Department and was named managing director in 2017. Prior to joining the firm, Ms. Lo worked as an economist in Barclays Bank PLC and as an emerging market risk specialist in Merrill Lynch International. Ms. Lo earned a BSc in Economics in 2000 and a MSc in Economics and Management in 2001, both from the London School of Economics.	1
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In accordance with Article 91(3), (4) and (5) of Directive 2013/36/EU, we counted directorships within the same group as a single directorship and did not count directorships in organisations which do not pursue predominantly commercial objectives.

**Table 47b: GSBE Supervisory Board of Directors**

Name	Background	Directorships
R. J. Gnodde	Richard J. Gnodde is the chair of the Supervisory Board <sup>4</sup> , having joined the Supervisory Board in October 2022. Mr. Gnodde is also the chief executive officer of GSI, having joined the GSI Board in October 2006. As of January 2023, Mr. Gnodde also serves as the chief executive officer and board director of GSIB. He has been a member of the Firmwide Management Committee since 2003 and is also the chair of the European Management Committee, the co-chair of the EMEA Inclusion and Diversity Committee and a member of the Firmwide Reputational Risk Committee. Mr. Gnodde joined Goldman Sachs in 1987. He also serves as a trustee of the University of Cape Town Trust and is on the Campaign Board of Cambridge University. Mr. Gnodde earned a BA from the University of Cape Town and an MA from Cambridge University.	1
E. E. Stecher	Esta Stecher joined the Supervisory Board in February 2018 and served as the deputy chair of the Supervisory Board until 31 January 2023 when she retired from her role as member and deputy chair of the Supervisory Board. Earlier in September 2021, Ms. Stecher retired as a partner and became a senior advisor to the firm. Ms. Stecher is a trustee emeritus of Columbia University and remains involved in other roles at Columbia University. Ms. Stecher joined Goldman Sachs in 1994, prior to which she was a partner at Sullivan and Cromwell. Ms. Stecher earned a BA from the University of Minnesota and a JD from Columbia Law School.	1
J.F.W. Rogers	John F.W. Rogers is the deputy chair of the Supervisory Board <sup>5</sup> , having joined the Supervisory Board in November 2022. Mr. Rogers serves as the executive vice president, the firm's chief of staff and secretary to the board of directors of The Goldman Sachs Group, Inc. He is a member of various GS committees including the Firmwide Management Committee and the Firmwide Reputational Risk Committee. He is also member of the board of the Goldman Sachs Charitable Gift Fund, the chairman of the Goldman Sachs Foundation and of the board of the Atlantic Council and vice chairman of the board of the American Academy in Rome. Mr. Rogers also serves as the chairman of the board of the White House Historical Association. In addition, he is a member of the board of directors of the Securities Industry and Financial Markets Association. Mr. Rogers joined Goldman Sachs in 1994. He was named managing director in 1997 and partner in 2000. Previously, Mr. Rogers served as the under secretary of state for management at the United States Department of State. He was the executive vice president of the Oliver Carr Company. Earlier, Mr. Rogers served as the assistant secretary of the Treasury and as an assistant to the president of the United States. In 1985, he received the Presidential Citizens Medal. He earned a BA degree in Public Affairs from the George Washington University in USA.	1
P. Berlinski <sup>6</sup>	Philip Berlinski joined the Supervisory Board in November 2022. Mr. Berlinski is the global treasurer of Goldman Sachs and the chief executive officer and a board director of GS Bank. Mr. Berlinski serves on a number of GS committees including the Firmwide Management Committee, the Firmwide Conduct Committee, the Firmwide Enterprise Risk Committee, and he co-chairs the Firmwide Asset and Liability Committee. Previously, Mr. Berlinski served as the chief operating officer of Global Equities. Before that, he was co-head of Global Equities Trading and Execution Services. Earlier in his career, Mr. Berlinski held various positions within Equities. He joined Goldman Sachs as an analyst in Equity Derivatives Research in 1998. Mr. Berlinski was named managing director in 2007 and partner in 2008. He earned an MA in Physics from the University of Oxford.	1
M. Rollins	Monique Rollins joined the Supervisory Board in November 2023. She is the chief operating officer of GS Bank and international treasurer of Goldman Sachs for Corporate Treasury. Ms. Rollins also serves as a board director of Goldman Sachs (Cayman) Holding Company and MCLP Asset Company, Inc. and as board manager of MCP Holding Company, LLC and MCP UK Holding Company, LLC. She is a member of various GS committees, including the GS Bank Management Committee, GS Bank New Activity Committee, GS Bank Risk and Asset Liability Committee, Regulatory Remediation Committee, and the Structured Products Committee. Previously, Ms. Rollins was global head of Resource Allocation for Corporate Treasury. She has also led unsecured funding and regulatory policy teams for Corporate Treasury. Ms. Rollins first joined Goldman Sachs in 2001 as an analyst in Credit Capital Markets. She rejoined the firm as a managing director in 2018.  Prior to returning to the firm, Ms. Rollins spent six years at the United States Department of the Treasury, where she most recently served as the acting assistant secretary of financial markets, overseeing all aspects of Treasury debt management. Ms. Rollins earned a BA in Economics and International Relations from Brown University and an MBA from the Wharton School of the University of Pennsylvania.	1

<sup>3</sup> Ms. Lo resigned from the firm and her role as GSBE Executive Board member on March 15, 2024.

<sup>4</sup> Mr. Gnodde served as the chair of the GSBE Supervisory Board until December 31, 2023. As of January 1, 2024, Mr. Gnodde serves as the deputy chair of the GSBE Supervisory Board.

<sup>5</sup> Mr. Rogers served as the deputy chair of the GSBE Supervisory Board until December 31, 2023. As of January 1, 2024, Mr. Rogers serves as the chair of the GSBE Supervisory Board.

<sup>6</sup> Mr. Berlinski resigned from his office as member of the GSBE Supervisory Board effective on October 31, 2023.

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E. Chryssikou	Efthalia Chryssikou joined the Supervisory Board in November 2022. Ms. Chryssikou is the head of Global FICC Sales Strats and Structuring. Ms.Chryssikou co-chairs the Structured Investments Product Committee and the UK Consumer Duty Oversight Committee and is a member of the Securities Division Client Index and Strategy Committee. In addition to that, Ms. Chryssikou serves as the chair of the board of the Association for Financial Markets in Europe. Prior to her current role, Ms. Chryssikou was the co-head of Global Sales Strats and Structuring across FICC and Equities. Previously, she was the head of European Interest Rate Product Sales, having previously managed the European Macro Sales Strats and Structuring team from 2008 to 2014. From 2004 to 2007, Ms. Chryssikou served as the head of the Pensions and Insurance Strategies Group. In 2001, she became a member of the Interest Rate Products Strats Group after joining Goldman Sachs in 1998 as an associate in the Firmwide Risk Department. Ms. Chryssikou was named managing director in 2007 and partner in 2010. She earned her MSSc in Civil Engineering from the National Technical University in Athens and a PhD in Operation Research from the Massachusetts Institute of Technology in USA.	1
L. Donnelly	Lisa Donnelly joined the Supervisory Board in January 2022. Ms. Donnelly also serves as a director on the boards of GSI and GSIB. Ms. Donnelly is the chief administrative officer for EMEA. She also oversees Operations, where she is responsible for coordinating common practices, standards and protocols for global Operations functions. Ms. Donnelly is the chair of the EMEA Federation Leadership Group, the Operations Leadership Group, the chair of the Firmwide Operational Risk and Resilience Committee, a member of the European Management Committee, the Firmwide Data Governance Committee, the Regulatory Remediation Committee, the Firmwide Conduct Committee, the EMEA Conduct Committee, the GSI Risk Committee, the GSIB Risk and Management Committees and the EMEA Inclusion and Diversity Committee. Ms. Donnelly joined Goldman Sachs in 2000. Prior to joining the firm, she worked at Deloitte Consulting. Ms. Donnelly earned a BA in English Literature from the University of Cambridge.	1
S. Morris	Simon Morris joined the Supervisory Board as an independent Supervisory Board member in November 2022. Mr. Morris is also a non-executive director of GS Bank and sole director and beneficiary of Boltons Place Capital Management Ltd. and SPM Capital Management Ltd. Previously, from 2004 to 2017 he was a partner in GSI with various leadership roles across the global FICC and Credit Franchise Divisions. He earned a BA degree in Geography and Economics from the London School of Economics.	2
Dr. Feuring	Wolfgang Feuring joined the Supervisory Board as an independent Supervisory Board member in February 2020. Mr. Feuring is Of Counsel at Sullivan and Cromwell LLP. Before joining Sullivan and Cromwell as a partner in 2001, Dr. Feuring was a partner of Freshfields Bruckhaus Deringer and predecessor firms and worked in the legal department of Deutsche Bank AG. He was admitted to the bar in 1981.	1
U. Pukropski	Ulrich Pukropski joined the Supervisory Board as an independent Supervisory Board member in April 2021. Mr. Pukropski also serves as an independent member of the Risk Monitoring Committee for Deposit Insurance Scheme for „Landesbanken“ in Germany. He served as Partner in Financial Services at KPMG Germany for 26 years, heading the Financial Services Practice as Managing Partner from 2013 to 2018. He was also a member of the KPMG Global Financial Services Leadership Team in that period. Mr. Pukropski earned his MBA at the University of Cologne and is a CPA in Germany.	1

In accordance with Article 91(3), (4) and (5) of Directive 2013/36/EU, directorships within the same group have been counted as a single directorship and did not count directorships in organisations which do not pursue predominantly commercial objectives.

This table reflects the members of the GSBE Supervisory Board as of December 31, 2023. Manuela Better joined the GSBE Supervisory Board as an independent Supervisory Board member in March 2024.



## Remuneration

### Introduction

The following disclosures are made by GSBE in accordance with CRR and Section 16 of the German Remuneration Ordinance for Institutions (Institutsvergütungsverordnung, “IVV”).

### Remuneration Programme Philosophy

Retention of talented employees is critical to executing the firm’s business strategy successfully. Remuneration is, therefore, a key component of the costs the firm incurs to generate revenues, similar to cost of goods sold or manufacturing costs in other industries.

The remuneration philosophy and the objectives of the remuneration programme for the firm are reflected in the Compensation Principles for GS Group, as posted on the Goldman Sachs public website:

<http://www.goldmansachs.com/investor-relations/corporate-governance/corporate-governance-documents/compensation-principles.pdf>

In particular, effective remuneration practices should:

- (i) Encourage a real sense of teamwork and communication, binding individual short-term interests to the institution’s long-term interests;
- (ii) Evaluate performance on a multi-year basis;
- (iii) Discourage excessive or concentrated risk-taking;
- (iv) Allow an institution to attract and retain proven talent;
- (v) Align aggregate remuneration for the firm with performance over the cycle; and
- (vi) Promote a strong risk management & control environment.

### Remuneration Frameworks

The Firmwide Performance Assessment & Variable Compensation Framework (“Firmwide Compensation Framework”) formalizes the variable remuneration practices of the firm.

The primary purpose of this Firmwide Compensation Framework is to assist the firm in assuring that its variable compensation program does not provide “covered employees” (i.e., senior executives as well as other

employees of the firm, who, either individually or as part of a group, have the ability to expose the firm to material amounts of risk) with incentives to take imprudent risks and is consistent with the safety and soundness of the firm.

Each business (e.g., Asset & Wealth Management, Global Banking & Markets) and each of its underlying business units (e.g., Asset Management, Investment Banking) maintains a Performance Assessment & Variable Compensation Framework that is specific to the business or the business unit, as applicable, and that is consistent with the Firmwide Compensation Framework (collectively, the “Compensation Frameworks”).

### Remuneration Governance

#### The Compensation Committee

The Board of Directors of GS Group (the “Group Board”) oversees the development, implementation and effectiveness of the firm’s global remuneration practices and it generally exercises this responsibility directly or through delegation to the Compensation Committee of the Group Board (the “Compensation Committee”). The responsibilities of the Compensation Committee include:

- Review and approval of (or recommendation to the Group Board to approve) the firm’s variable remuneration structure, including the portion to be paid as share-based awards, all year-end share-based grants for eligible employees (including those employed by GSBE), and the terms and conditions of such awards.
- Assisting the Group Board in its oversight of the development, implementation and effectiveness of policies and strategies relating to the Human Capital Management (“HCM”) function, including recruiting, retention, career development and progression, management succession (other than that within the purview of the Corporate Governance and Nominating Committee) and diversity.

The Compensation Committee held 10 meetings in 2023 to discuss and make determinations regarding remuneration.

The members of the Compensation Committee at the end of 2023 were Kimberley D. Harris (Chair), M. Michele Burns, Kevin R. Johnson, Ellen J. Kullman, Lakshmi N. Mittal and Adebayo O. Ogunlesi (ex-officio). None of the members of the Compensation Committee was an employee of the firm.

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All members of the Compensation Committee were “independent” within the meaning of the New York Stock Exchange Rules and the Group Board Policy on Director Independence.

**External Consultants**

The Compensation Committee recognizes the importance of using a remuneration consultant that is appropriately qualified and is determined to be independent. The independence of the remuneration consultant is reviewed and confirmed annually by the Compensation Committee.

For 2023, the Compensation Committee received the advice of a remuneration consultant from Frederic W. Cook & Co. (FW Cook).

**Other Group Stakeholders**

In carrying out the responsibilities of the Compensation Committee, the Chair of the Compensation Committee met multiple times with senior management during the year, including the firm’s Chief Operating Officer (“COO”), the Executive Vice President, the Global Head of HCM and other members of senior management.

**The GSBE Remuneration Committee**

The Board Remuneration Committee of GSBE (the “Remuneration Committee”) was established in 2021. The responsibilities of the Remuneration Committee include:

- Overseeing the development and implementation of the GSBE remuneration policy (the “GSBE Remuneration Policy”) and related practices of GSBE in accordance with the relevant provisions in the German Banking Act (Kreditwesengesetz, “KWG”), the IVV, the EBA Guidelines on Sound Remuneration Systems (“EBA/GL/2021/04”) (“EBA Guidelines”) and any other applicable law and regulation;
- Supporting and advising the GSBE Supervisory Board (the “Supervisory Board”) on the design of GSBE’s remuneration systems in line with the GSBE Remuneration Policy and applicable law and regulation;
- Preparing resolutions for the Supervisory Board on the remuneration of the members of the GSBE Executive Board (the “Executive Board”), having regard to GSBE’s performance and risk management among other factors;

- Assisting the Supervisory Board in monitoring the process of designating the Material Risk Takers of GSBE.

The Remuneration Committee held 9 meetings in 2023 in fulfilment of these responsibilities.

At the end of 2023:

- the members of the Remuneration Committee were Wolfgang Feuring (Chair), Ulrich Pukropski, Simon Morris and John F. W. Rogers;
- none of the members of the Remuneration Committee was an employee of GSBE.

**GSBE Remuneration Officer**

The Remuneration Officer oversees the design and implementation of remuneration systems applicable to all GSBE employees, excluding Executive Board, members and provides support to the Supervisory Board and to the Remuneration Committee related to their respective supervisory tasks and design monitoring in relation to all remuneration systems in the entity.

**GSBE Board Governance**

The Executive Board is responsible for overseeing the development and implementation of the GSBE Remuneration Policy in alignment with GSBE’s business and risk strategies. The Executive Board will ensure that the GSBE Remuneration Policy is subject to an independent internal review at least annually, and, as far as it applies to the remuneration of the Executive Board, by the Supervisory Board. The Executive Board will at least annually update the Supervisory Board on the GSBE Remuneration Policy. In 2023, the Executive Board held 51 meetings.

In addition, the firm’s EMEA Conduct Committee assists senior management of GSBE in the oversight of conduct risk and business standards.

**Compensation-related Risk Assessment**

The GS Group’s Chief Risk Officer (“CRO”) presented an annual compensation-related risk assessment to the Compensation Committee, meeting jointly with the Risk Committee of the GS Board, to assist the Compensation Committee in its assessment of the effectiveness of the firm’s remuneration programme, and particularly, whether the programme is consistent with the principle that variable remuneration does not encourage employees to expose the firm to imprudent risk. This assessment most recently occurred in December 2023.

**Pillar 3 Disclosures**

The compensation-related risk assessment was also presented to the Executive Board and Remuneration Committee by the GSBE CRO.

**Remuneration Recommendations for GSBE employees**

The firm's global process for setting variable remuneration (including the requirement to consider risk and compliance issues) applies to employees of GSBE in the same way as to employees in other regions and is subject to oversight by the senior management of the firm in the region. The firm uses a highly disciplined and robust process for setting variable remuneration across all regions following the processes outlined in the Compensation Frameworks.

This process involves compensation managers and compensation committees, at various levels in the firm, along with the business and business unit heads, HCM and the Firmwide Management Committee (the firm's most senior leaders), as appropriate.

In addition, as part of the remuneration determination process, members of the firm's Compliance, Risk, Employment Law Group and Employee Relations functions make arrangements for business and business unit management to take into consideration certain compliance, risk or control matters when determining remuneration of individuals. Before any individual remuneration decisions are finalised, Employee Relations and the Employment Law Group assess the recommended remuneration for relevant individuals in the context of overall performance and other factors, and recommendations are reviewed with respect to comparators.

Remuneration recommendations for individual GSBE employees developed via the global remuneration determination process are presented for approval to the relevant Executive Board members or their delegates for each GSBE business, and recommendations developed for Executive Board members are presented to the Supervisory Board for approval.

**Link Between Pay and Performance**

In 2023, annual remuneration for employees comprised fixed remuneration (including base salary) and variable remuneration. The firm's remuneration practices provide for variable remuneration determinations to be made on a discretionary basis. Variable remuneration is based on multiple factors and is not set as a fixed percentage of revenue or by reference to any other formula, consistent with the

process outlined in the Compensation Frameworks. Firmwide performance is a key factor in determining variable remuneration.

The firm is committed to aligning variable remuneration with performance. In order to do so, the performance of the firm, relevant business, and/or business unit, desk (if applicable) and individual over the past year, as well as over prior years, are taken into account. The firm believes that the firm's senior leaders have responsibility for overall performance and, as a result, senior employees have experienced more volatility in their remuneration year-over-year, particularly in periods when the firm's performance declined significantly.

The firm believes that multi-year guarantees should be avoided as they risk misaligning remuneration and performance, and guaranteed variable remuneration should be awarded in exceptional circumstances only (for example, for certain new hires).

**Performance Measurement**

Financial performance is measured at the firmwide, business, business unit, desk and individual level as applicable. GSBE performance and risk metrics are also considered.

**Firmwide performance**

The following metrics are among the firmwide financial performance measures, considered in determining amounts, although the firm does not use specific measures/targets as part of a formula.

- Net revenues;
- Provision for credit losses;
- Revenues net of provision for credit losses;
- Compensation and benefits expense;
- Non-compensation expenses;
- Pre-tax earnings;
- Net earnings;
- Ratio of compensation and benefits to revenues net of provision for credit losses;
- Efficiency ratio;
- Diluted earnings per share;
- Return on average common equity;
- Return on average tangible common equity; and
- Book value per common share

**Pillar 3 Disclosures****Business, business unit, desk performance**

Additionally, at both the business and business unit level, quantitative and/or qualitative metrics specific to such levels, respectively, and below are used to evaluate the performance of the business/business unit and their respective employees.

**Individual performance**

Employees are evaluated annually as part of the performance review feedback process. This process reflects input from a number of employees, including supervisors, peers and those who are junior to the employee, regarding an array of performance measures. The performance evaluations for 2023 included assessments of Teamwork and Collaboration (One GS); Compliance, Risk Management, Code of Conduct, and Firm Reputation; sensitivity to Risk and Control (revenue-producing employees); Control Side Empowerment (control functions); and Culture. As part of the performance review feedback process, managers with three or more direct reports are assessed and receive feedback on their performance as a manager.

**Risk Management and Adjustment**

Prudent risk management is a hallmark of the firm's culture and sensitivity to risk and risk management are key elements in assessing employee performance, including as part of the performance review feedback process noted above.

The firm takes risk, including conduct risk, into account both on an ex-ante and ex-post basis when setting the amount and form of variable remuneration for employees. As indicated in the Compensation Frameworks, different lines of business have different risk profiles and these are taken into account when determining remuneration. These include credit, market, liquidity, operational, reputational, funding, legal, compliance and conduct risks. Guidelines are provided to assist compensation managers when exercising discretion during the remuneration process to promote appropriate consideration of the different risks presented by the firm's businesses. Further, to ensure the independence of control function employees, remuneration for those employees is not determined by individuals in revenue-producing positions but rather by the management of the relevant control function.

Consistent with prior years, for 2023 certain employees receive a portion of their variable remuneration as a share-based award that is subject to a number of terms and conditions that could result in forfeiture or recapture. For further details, see "Structure of Remuneration" below.

In the 2023 annual compensation-related risk assessment presented to the Compensation Committee, meeting jointly with the Risk Committee of the Group Board, GS Group's CRO confirmed that the various components of the firm's remuneration programmes and policies (for example, process, structure and governance) balanced risk and incentives in a manner that does not encourage imprudent risk-taking. In addition, the CRO stated that the firm has a risk management process that, among other things, is consistent with the safety and soundness of the firm and focuses on our:

- (i) Risk management culture: the firm's culture emphasises continuous and prudent risk management;
- (ii) Risk-taking authority: there is a formal process for identifying employees who, individually or as part of a group, have the ability to expose the firm to material amounts of risk;
- (iii) Upfront risk management: the firm has tight controls on the allocation, utilisation and overall management of risk-taking, as well as comprehensive profit and loss and other management information which provide ongoing performance feedback. In addition, in determining variable remuneration, the firm reviews performance metrics that incorporate ex-ante risk adjustments; and
- (iv) Governance: the oversight of the Group Board, management structure and the associated processes all contribute to a strong control environment and control functions have input into remuneration structure and design

**Structure of Remuneration**

In accordance with a resolution of the shareholders of GSBE, the variable component of remuneration paid to GSBE employees and to the Executive Board shall not exceed 200% of the fixed component (for control function employees, the variable component shall not exceed 50% of the fixed component). The resolution concluded that the variable remuneration ratio does not incentivise inappropriate risk taking and is consistent with the prudential management of fixed remuneration.

Employees who meet the criteria set out in Commission Delegated Regulation (EU) 2021/923 ("Risk Taker Regulation") and all Supervisory Board and Executive Board members have been identified as Material Risk Takers.

**Fixed Remuneration**

The firm has a global salary approach to ensure consistency

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in salary levels and to achieve an appropriate balance between fixed and variable remuneration.

For certain employees additional fixed remuneration is awarded in the form of an allowance generally paid in cash. The selection of recipients and the value of allowances awarded are determined as a result of an evaluation, role and level of organizational responsibility.

**Variable Remuneration**

For employees with total remuneration and variable remuneration above specific thresholds, variable remuneration is generally paid in a combination of cash and share-based remuneration. In general, the portion paid in the form of a share-based award increases as variable remuneration increases and, for Material Risk Takers, is set to ensure compliance with the KWG, IVV and EBA Guidelines.

The variable remuneration programme is flexible to allow the firm to respond to changes in market conditions and to maintain its pay-for-performance approach. Variable remuneration is discretionary (even if paid consistently over a period of years).

**Share-Based Remuneration**

The firm believes that remuneration should encourage a long-term, firmwide approach to performance and discourage imprudent risk-taking. Paying a significant portion of variable remuneration in the form of share-based remuneration that delivers over time, changes in value according to the price of shares of common stock (shares) of GS Group and is subject to forfeiture or recapture encourages a long-term, firmwide focus because its value is realised through long-term responsible behaviour and the financial performance of the firm.

The firm imposes transfer restrictions, retention requirements, and anti-hedging policies to further align the interests of the firm's employees with those of the firm's shareholders. The firm's retention and transfer restriction policies, coupled with the practice of paying senior employees a significant portion of variable remuneration in the form of share-based awards, leads to a considerable investment in shares of GS Group over time. For share-based awards granted to certain employees, performance conditions may also be applicable.

- Deferral Policy:** The deferred portion of fiscal year 2023 annual variable remuneration was generally awarded in the form of Restricted Stock Units (RSUs). GS Group Inc. issues awards in the form of RSUs to the bank's employees in exchange for employee services. An RSU is an unfunded, unsecured promise to deliver a share on a predetermined date. RSUs awarded in respect of fiscal year 2023 generally deliver in three equal instalments on or about each of the first, second and third anniversaries of the grant date, assuming the employee has satisfied the terms and conditions of the award at each such date. Where required under the KWG, IVV and EBA Guidelines, RSUs awarded in respect of fiscal year 2023 for Material Risk Takers generally deliver in four equal instalments on or about each of the first, second, third and fourth anniversaries of the grant date, or, for members of GSBE Senior Management on or about each of the first, second, third, fourth and fifth anniversaries of the grant date, assuming in each case, the employee has satisfied the terms and conditions of the award at each such date.
- Transfer Restrictions:** The firm generally requires certain individuals to hold a material portion of the shares they receive in respect of RSUs granted as part of their year-end remuneration according to the firm's global deferral table. These transfer restrictions apply to the lower of 50% of the shares delivered before reduction for tax withholding, or the number of shares received after reduction for tax withholding.

An employee generally cannot sell, exchange, transfer, assign, pledge, hedge or otherwise dispose of any RSUs or shares that are subject to transfer restrictions.
- Retention Requirement:** All shares delivered to employees designated as Material Risk Takers in relation to their variable remuneration are subject to retention in accordance with the requirements of the KWG, IVV and EBA Guidelines.
- Forfeiture and Recapture Provisions:** The RSUs and shares delivered thereunder in relation to variable remuneration are subject to forfeiture or recapture if the Compensation Committee or its delegate(s) determine(s) that during 2023 the employee participated (or otherwise oversaw or was responsible for, depending on the circumstances, another individual's participation) in the structuring or marketing of any product or service, or participated on behalf of the firm or any of its clients in the purchase or sale of any security or other property, in any case without appropriate consideration of the risk to the firm or the broader financial system as a whole (for example, if the employee were to improperly analyse risk

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or fail sufficiently to raise concerns about such risk) and, as a result of such action or omission, the Compensation Committee or its delegate(s) determine(s) there has been, or reasonably could be expected to be, a material adverse impact on the firm, the employee's business unit or the broader financial system.

This provision is not limited to financial risks, is in addition to the KWG and IVV requirements and is designed to encourage the consideration of the full range of risks associated with the activities (for example, legal, compliance or reputational). The provision also does not require that a material adverse impact actually occur, but rather may be triggered if the firm determines that there is a reasonable expectation of such an impact.

The Compensation Committee previously adopted guidelines that set forth a formal process regarding determinations to forfeit or recapture awards for failure to consider risk appropriately upon the occurrence of certain pre-determined events (for example, in the event of annual firmwide, business unit and below or individual losses). The review of whether forfeiture or recapture is appropriate includes input from the CRO, as well as representatives from Legal and Compliance, as appropriate. Determinations are made by the Compensation Committee or its delegates, with any determinations made by delegates reported to the Compensation Committee.

RSUs granted to all Material Risk Takers in relation to variable remuneration are generally subject to forfeiture until delivery of the underlying shares if US bank regulators recommend the appointment of a receiver under the US Dodd-Frank Wall Street Reform and Consumer Protection Act 2010 ("Dodd-Frank") based on its determination that GS Group is "in default" or "in danger of default" as defined under Dodd-Frank or fails to maintain for 90 consecutive business days, the required "minimum tier 1 capital ratio" (as defined under Federal Reserve Board regulations).

Additionally, RSUs and shares delivered thereunder in relation to variable remuneration are generally subject to forfeiture or recapture if it is appropriate to hold a Risk Taker accountable in whole or in part for an "adjustment event" that occurred during 2023. This may include conduct which resulted in a material loss of capital or a material relevant regulatory sanction for the Firm

An employee's RSUs may also be forfeited, and shares delivered thereunder recaptured if the employee engages in conduct constituting "cause" at any time before the RSUs are delivered and any applicable transfer restrictions lapse. Cause includes, among other things, any material violation

of any firm policy, any act or statement that negatively reflects on the firm's name, reputation or business interests and any conduct detrimental to the firm.

With respect to all of the forfeiture conditions, if the firm determines after delivery or release of transfer restrictions that an RSU or share delivered thereunder should have been forfeited or recaptured, the firm can require return of any shares delivered or repayment to the firm of the fair market value of the shares when delivered (including those withheld to pay taxes) or any other amounts paid or delivered in respect thereof.

- **Severance:** Except as may be required by applicable law (such as contractual notice pay), severance pay is discretionary and the severance terms for departing employees are generally agreed with employees and will depend on the circumstances of the particular case.
- **Hedging:** The firm's anti-hedging policy ensures employees maintain the intended exposure to the firm's stock performance. In particular, all employees are prohibited from hedging RSUs, shares that are subject to transfer restrictions, and, to the extent applicable, retention shares. In addition, executive officers of GS Group (as defined under the Securities Exchange Act of 1934) are prohibited from hedging any shares that they can freely sell. Employees, other than executive officers, may hedge only shares that they can otherwise sell. However, no employee may enter into uncovered hedging transactions or sell short any shares. Employees may only enter into transactions or otherwise make investment decisions with respect to shares during applicable "window periods".
- **Treatment upon Termination or Change-in-Control:** As a general matter, delivery schedules are not accelerated, and transfer restrictions are not removed, when an employee leaves the firm. The limited exceptions include death and "conflicted employment." A change in control alone is not sufficient to trigger acceleration of any deliveries or removal of transfer restrictions; only if the change in control is followed within 18 months by a termination of employment by the firm without "cause" or by the employee for "good reason" will delivery and release of transfer restrictions be accelerated.

**Pillar 3 Disclosures****Quantitative Disclosures**

The following tables show aggregate quantitative remuneration information for 197 individuals, categorised as Material Risk Takers for the purposes of the KWG, IVV, and EBA Guidelines.

During the financial year, GSBE paid overall:

Total Remuneration	€ 428mn
• of which fixed remuneration	€ 270mn
• of which variable remuneration	€ 158mn to 1,126 employees

A more detailed overview of the Material Risk Taker quantitative information is presented in the below tables.

Material Risk Takers are also eligible to receive certain general non-discretionary ancillary payments and benefits on a similar basis to other employees. These payments and benefits are not included in the disclosures below. All elements of remuneration are disclosed in EUR in millions, unless otherwise stated.

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Table 48: EU REM1 - Remuneration awarded for the financial year

		MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Number of identified staff	10	8	15	164
2	Total fixed remuneration	0.51	13.59	22.66	133.50
3	Of which cash-based	0.51	13.59	22.66	133.50
4	(Not applicable in the EU)				
EU-4a	Of which shares or equivalent ownership interests	-	-	-	-
5	Of which share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x	Of which: other instruments	-	-	-	-
6	(Not applicable in the EU)				
7	Of which: other forms	-	-	-	-
8	(Not applicable in the EU)				
9	Number of identified staff	10	8	15	164
10	Total variable remuneration	-	11.27	15.94	80.06
11	Of which: cash-based	-	0.76	1.06	12.40
12	Of which: deferred	-	-	-	-
EU-13a	Of which: shares or equivalent ownership interests	-	10.51	14.88	67.66
EU-14a	Of which deferred	-	9.76	14.06	55.62
EU-13b	Of which share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-14b	Of which deferred	-	-	-	-
EU-14x	Of which other instruments	-	-	-	-
EU-14y	Of which deferred	-	-	-	-
15	Of which other forms	-	-	-	-
16	Of which deferred	-	-	-	-
17	<b>Total remuneration (2 + 10)</b>	<b>€ 0.51</b>	<b>€ 24.86</b>	<b>€ 38.60</b>	<b>€ 213.56</b>

Table 49: EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

		MB Supervisory function	MB Management function	Other senior management	Other identified staff
<b>Guaranteed variable remuneration awards</b>					
1	Guaranteed variable remuneration awards - Number of identified staff	-	-	-	-
2	Guaranteed variable remuneration awards -Total amount	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
<b>Severance payments awarded in previous periods, that have been paid out during the financial year</b>					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	-	-	-	-
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	-	-
<b>Severance payments awarded during the financial year</b>					
6	Severance payments awarded during the financial year - Number of identified staff	-	-	-	3
7	Severance payments awarded during the financial year - Total amount	-	-	-	2.81
8	Of which paid during the financial year	-	-	-	-
9	Of which deferred	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
11	Of which highest payment that has been awarded to a single person	-	-	-	1.68



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Table 50: EU REM3 - Deferred remuneration

	Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to explicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	<b>MB Supervisory function</b>	-	-	-	-	-	-	-	-
2	Cash-based	-	-	-	-	-	-	-	-
3	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
5	Other instruments	-	-	-	-	-	-	-	-
6	Other forms	-	-	-	-	-	-	-	-
7	<b>MB Management function</b>	<b>€ 9.92</b>	<b>€ 6.06</b>	<b>€ 3.86</b>	-	-	<b>€ 0.31</b>	<b>€ 6.06</b>	<b>€ 6.06</b>
8	Cash-based	-	-	-	-	-	-	-	-
9	Shares or equivalent ownership interests	9.92	6.06	3.86	-	-	0.31	6.06	6.06
10	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
11	Other instruments	-	-	-	-	-	-	-	-
12	Other forms	-	-	-	-	-	-	-	-
13	<b>Other senior management</b>	<b>€ 48.16</b>	<b>€ 10.96</b>	<b>€ 37.20</b>	-	-	<b>€ 3.64</b>	<b>€ 10.96</b>	<b>€ 10.96</b>
14	Cash-based	-	-	-	-	-	-	-	-
15	Shares or equivalent ownership interests	48.16	10.96	37.20	-	-	3.64	10.96	10.96
16	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
17	Other instruments	-	-	-	-	-	-	-	-
18	Other forms	-	-	-	-	-	-	-	-
19	<b>Other identified staff</b>	<b>€ 152.47</b>	<b>€ 47.90</b>	<b>€ 104.57</b>	-	-	<b>€ 10.17</b>	<b>€ 47.90</b>	<b>€ 47.90</b>
20	Cash-based	-	-	-	-	-	-	-	-
21	Shares or equivalent ownership interests	152.47	47.90	104.57	-	-	10.17	47.90	47.90
22	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
23	Other instruments	-	-	-	-	-	-	-	-
24	Other forms	-	-	-	-	-	-	-	-
25	<b>Total amount</b>	<b>€ 210.55</b>	<b>€ 64.92</b>	<b>€ 145.63</b>	-	-	<b>€ 14.12</b>	<b>€ 64.92</b>	<b>€ 64.92</b>

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Table 51: EU REM4 - Remuneration of 1 million EUR or more per year

EUR	Identified staff that are high earners as set out in Article 450(i) CRR
1 1 000 000 to below 1 500 000	37
2 1 500 000 to below 2 000 000	19
3 2 000 000 to below 2 500 000	11
4 2 500 000 to below 3 000 000	7
5 3 000 000 to below 3 500 000	4
6 3 500 000 to below 4 000 000	3
7 4 000 000 to below 4 500 000	4
8 4 500 000 to below 5 000 000	0
9 5 000 000 and above	10

Table 52: EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	Management body remuneration			Business areas						Total
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Ind. internal control functions	All other	
1 Total number of identified staff										197
2 Of which members of the MB	10	8	18							
3 Of which other senior management				6	-	2	3	4	-	
4 Of which other identified staff				130	-	17	8	9	-	
5 Total remuneration of identified staff	€ 0.51	€ 24.86	€ 25.37	€ 215.70	-	€ 29.06	€ 4.03	€ 3.38	-	
6 Of which variable remuneration	-	11.27	11.27	78.68	-	15.05	1.58	0.70	-	
7 Of which fixed remuneration	0.51	13.59	14.10	137.02	-	14.01	2.45	2.68	-	

## **Cautionary Note on Forward-Looking Statements**

We have included in these disclosures, and our management may make, statements that may constitute “forward-looking statements.” Forward-looking statements are not historical facts or statements of current conditions, but instead represent only our beliefs regarding future events, many of which, by their nature, are inherently uncertain and outside our control. These statements include statements other than historical information or statements of current conditions.

It is possible that our actual results and financial condition may differ, possibly materially, from the anticipated results and financial condition indicated in these forward-looking statements. Important factors that could cause our actual results and financial condition to differ from those indicated in the forward-looking statements include, among others, those discussed in “Forecast and Opportunities Report” within “Management Report” of GSBE’s 2023 Financial Statements.

## Glossary

- **Central Counterparty (CCP).** A counterparty, such as a clearing house, that facilitates trades between counterparties.
  - **Credit Risk.** The potential for loss due to the default or deterioration in credit quality of a counterparty (e.g., an OTC derivatives counterparty or a borrower) or an issuer of securities or other instruments we hold.
  - **Credit Valuation Adjustment (CVA).** An adjustment applied to uncollateralised OTC derivatives to cover the risk of mark-to-market losses of bilateral credit risk (i.e. counterparty and own) in uncollateralised derivatives.
  - **Default Risk.** The risk of loss on a position that could result from failure of an obligor to make timely payments of principal or interest on its debt obligation, and the risk of loss that could result from bankruptcy, insolvency, or similar proceedings.
  - **Effective Expected Positive Exposure (EEPE).** The time-weighted average of non-declining positive credit exposure over the EE simulation. EEPE is used in accordance with the IMM as the exposure measure that is then risk weighted to determine counterparty risk capital requirements.
  - **Event Risk.** The risk of loss on equity or hybrid equity positions as a result of a financial event, such as the announcement or occurrence of a company merger, acquisition, spin-off, or dissolution.
  - **Expected Exposure (EE).** The expected value of the probability distribution of non-negative credit risk exposures to a counterparty at any specified future date before the maturity date of the longest-term transaction in a netting set.
- Exposure at Default (EAD).** The exposure amount that is risk weighted for regulatory capital calculations. For on-balance-sheet assets, such as receivables and cash, EAD is generally based on the balance sheet value. For the calculation of EAD for off-balance-sheet items, including commitments and guarantees, an equivalent exposure amount is calculated based on rules-based credit conversion factors (CCF), which typically depend on whether the commitment is less than one year (20%), greater than one year (50%) or are unconditionally cancellable or that effectively provide for automatic cancellation due to deterioration in a borrower's creditworthiness (0%).
- For substantially all the counterparty credit risk arising from OTC derivatives, exchange-traded derivatives and securities financing transactions, internal models calculate the distribution of exposure upon which the EAD calculation is based.
- **Incremental Risk.** The potential loss in value of non-securitised positions due to the default or credit migration of issuers of financial instruments over a one-year time horizon. This measure is calculated at a 99.9% confidence level over a one-year time horizon using a multi-factor model.
  - **Internal Models Methodology (IMM).** The IMM establishes a methodology for entities to use their internal models to estimate exposures arising from OTC derivatives, securities financing transactions and cleared transactions, subject to qualitative and quantitative requirements and supervisory approval.
  - **Market Risk.** Market risk is the risk of an adverse impact to the earnings due to changes in market conditions.
  - **Operational Risk.** The risk of an adverse outcome resulting from inadequate or failed internal processes, people, systems or from external events.
  - **Other Systemically Important Institutions.** Institutions identified by national regulators as those whose failure or malfunction could potentially lead to serious negative consequences for the domestic financial systems and real economy.
  - **Prudent Valuation Adjustment (PVA).** A deduction from CET1 capital where the prudent value of trading assets or other financial assets measured at fair value is materially lower than the fair value recognised in the financial information.
  - **Regulatory Value-at-Risk (VaR).** The potential loss in value of trading positions due to adverse market movements over a 10-day time horizon with a 99% confidence level.
  - **Regulatory VaR Backtesting.** Comparison of daily positional loss results to the Regulatory VaR measure calculated as of the end of the prior business day.
  - **Resecuritisation Position.** Represents an on or off-balance-sheet transaction in which the risk associated with an underlying pool of exposures is tranching and at least one of the underlying exposures is a securitisation position.
  - **SA-CCR.** Effective from June 2021, the new standardised approach to counterparty credit risk (SA-CCR) replaces the mark-to-market method to determine the exposure value for derivatives. The approach is used for the purposes of determining the exposure value for derivatives that are not in scope of the internal model method, for leverage and for large exposure purposes.

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- **Securitisation Position.** Represents a transaction or scheme in which the credit risk associated with an exposure or pool of exposures is tranching and both payments in the transaction or scheme are dependent upon the performance of the exposure or pool of exposures and the subordination of tranches determines the distribution of losses during the ongoing life of the transaction or scheme.
- **Specific Risk.** The risk of loss on a position that could result from factors other than broad market movements and includes event risk, default risk and idiosyncratic risk. The specific risk add-on is applicable for both securitisation positions and for certain non-securitised debt and equity positions, to supplement the model-based measures.
- **Stress Testing.** Stress testing is a method of determining the effect of various hypothetical stress scenarios.
- **Stressed VaR (SVaR).** The potential loss in value of trading assets and liabilities, as well as certain investments, loans, and other financial assets and liabilities, during a period of significant market stress. SVaR is calculated at a 99% confidence level over a 10-day horizon using market data inputs from a continuous 12-month period of stress.
- **Synthetic Securitisation.** Defined as a securitisation transaction in which the tranching is achieved by the use of credit derivatives or guarantees, and the pool of exposures is not removed from the balance sheet of the originator.
- **Traditional Securitisation.** Defined as a securitisation transaction which involves the economic transfer of the exposures being securitised to a securitisation special purpose entity which issues securities; and so that this must be accomplished by the transfer of ownership of the securitised exposures from the originator or through sub-participation; and the securities issued do not represent payment obligations of the originator.
- **Value-at-Risk (VaR).** The potential loss in value of trading assets and liabilities, certain investments, loans, and other financial assets and liabilities accounted for at fair value, due to adverse market movements over a defined time horizon with a specified confidence level. Risk management VaR is calculated at a 95% confidence level over a one-day horizon.
- **Wholesale Exposure.** A term used to refer collectively to credit exposures to companies, sovereigns, or government entities (other than Securitisation, Retail or Equity exposures).

## Appendix I: Scope of Consolidation Tables

### Consolidated Balance Sheet under the Regulatory Scope of Consolidation

The following table provides a reconciliation of GSBE's balance sheet as of December 2023 on an accounting consolidation basis to the GSBE's balance sheet under the regulatory scope of consolidation. It also breaks down how carrying values under the scope of regulatory consolidation are allocated to the different risk frameworks laid out in Part Three of the CRR.

**Table 53: EU LI1 - Differences Between Accounting and Regulatory Scopes of Consolidation and Mapping of Financial Statement Categories with Regulatory Risk Categories**

Carrying values under the scope of regulatory consolidation shown in the third column below may not be the sum of the carrying values shown in the remaining columns as some items are subject to capital requirements in one or more risk frameworks.

<i>€ in millions</i>	As of December 2023						
	Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items:				Not subject to capital requirements or subject to deduction from capital
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	
<b>Assets</b>							
Cash and cash equivalents	€ 15,478	€ 15,478	€ 15,478	-	-	-	-
Collateralised agreements	15,491	15,491	-	15,491	-	-	-
Customer and other receivables	20,195	20,195	2,925	17,270	-	-	-
Trading Assets	237,997	237,997	-	215,538	-	237,997	-
Investments	-	-	-	-	-	-	-
Loans	1,162	1,162	1,123	-	39	-	-
Other assets	807	807	775	-	-	-	32
<b>Total assets</b>	<b>€ 291,130</b>	<b>€ 291,130</b>	<b>€ 20,300</b>	<b>€ 248,299</b>	<b>€ 39</b>	<b>€ 237,997</b>	<b>€ 32</b>
<b>Liabilities</b>							
Collateralised financings	€ 15,198	€ 15,198	-	€ 15,198	-	-	-
Customer and other payables	14,432	14,432	-	11,614	-	-	2,818
Trading liabilities	226,282	226,282	-	216,108	-	226,282	-
Deposits	11,149	11,149	-	-	-	-	11,149
Unsecured borrowings	10,015	10,015	-	-	-	-	10,015
Other liabilities	1,070	1,070	-	-	-	-	1,070
<b>Total liabilities</b>	<b>€ 278,146</b>	<b>€ 278,146</b>	<b>-</b>	<b>€ 242,920</b>	<b>-</b>	<b>€ 226,282</b>	<b>€ 25,052</b>

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## Regulatory Balance Sheet Assets Reconciliation to Exposure at Default (EAD)

The following table presents a reconciliation of the consolidated regulatory balance sheet to EAD for items subject to credit risk, CCR and securitisation frameworks.

**Table 54: EU LI2 - Main Sources of Differences Between Regulatory Exposures Amounts and Carrying Values in IFRS Financial Information**

<i>€ in millions</i>		As of December 2023				
		a	b	c	d	e
		Items subject to				
		Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	<b>Assets carrying value amount under the scope of prudential consolidation (as per template LI1)</b>	<b>€ 506,635</b>	<b>€ 20,300</b>	<b>€ 39</b>	<b>€ 248,299</b>	<b>€ 237,997</b>
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	(469,202)	-	-	(242,920)	(226,282)
3	Total net amount under the scope of prudential consolidation	37,434	20,300	39	5,380	11,715
4	Off-balance-sheet amounts	7,650	7,650	-	-	
5	Differences in valuations	-	-	-	-	
6	Differences due to different netting rules, other than those already included in row 2	-	-	-	-	
7	Differences due to consideration of provisions	-	-	-	-	
8	Differences due to the use of credit risk mitigation techniques (CRMs)	-	-	-	-	
9	Differences due to credit conversion factors	(3,785)	(3,785)	-	-	
10	Differences due to Securitisation with risk transfer	-	-	-	-	
11	**Other differences	14,382	(1,465)	-	15,847	
12	<b>Exposure amounts considered for regulatory purposes</b>	<b>€ 43,966</b>	<b>€ 22,700</b>	<b>€ 39</b>	<b>€ 21,227</b>	<b>*</b>

\*Exposure amounts considered for regulatory purposes under row 12 in the table above are not disclosed for market risk framework given exposure amounts are more relevant for credit, counterparty credit and securitisation frameworks.

\*\*Other differences mainly contain difference due to netting of collateral, haircut and EAD modelling.

Off-balance sheet amounts in row 4 above are stated gross and primarily consist of undrawn committed facilities and guarantees.

### Explanations of differences between accounting and regulatory exposure amounts

The carrying value of assets is usually measured at amortised cost or fair value as at the balance sheet date. For on-balance-sheet assets, such as receivables and cash, the EAD is generally based on the carrying value. For the calculation of EAD for off-balance-sheet exposures, including commitments and guarantees, a credit equivalent exposure amount is calculated based on the notional amount of each transaction multiplied by a credit conversion factor in accordance with Article 166 of CRR.

As GSBE calculates the majority of its credit exposure under the IMM, the impacts of netting and collateral are integral to the calculation of the exposure. The exposures considered for regulatory purposes are presented on a net and collateralised basis where there is a legally enforceable netting and collateral opinion. Under IFRS, netting is permitted if legal right of set-off exists and the cash flows are intended to be settled on a net basis.

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**Table 55: EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements**

Following table represents balance sheet as in published consolidated IFRS Financial Information prepared in accordance with the applicable accounting framework and under regulatory scope of consolidation. There are no differences in consolidation methodology under the accounting and regulatory frameworks.

<i>€ in millions</i>				As of December 2023
	Balance sheet as in published IFRS Financial Information	Under regulatory scope of consolidation		Reference
	As at period end	As at period end		
<b>Assets - Breakdown by asset classes according to the balance sheet in the published financial statements</b>				
1	Cash and cash equivalents	€ 15,478	€ 15,478	
2	Collateralised agreements	15,491	15,491	
3	Customer and other receivables	20,195	20,195	
4	Trading assets	237,997	237,997	
5	Investments	-	-	
6	Loans	1,162	1,162	
7	Other assets	807	807	
	<b>Total assets</b>	<b>€ 291,130</b>	<b>€ 291,130</b>	
<b>Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements</b>				
8	Collateralised financings	€ 15,198	€ 15,198	
9	Customer and other payables	14,432	14,432	
10	Trading liabilities	226,282	226,282	
11	Deposits	11,149	11,149	
12	Unsecured borrowings	10,015	10,015	
13	Other liabilities	1,070	1,070	
	<b>Total liabilities</b>	<b>€ 278,146</b>	<b>€ 278,146</b>	
<b>Shareholders' Equity</b>				
14	Share capital	€ 329	€ 329	Row 1 of CC1 template
15	Share premium account	26	26	Row 1 of CC1 template
16	Other equity instruments	10,576	10,576	Row 3 of CC1 template
17	Retained earnings	2,051	2,051	Row 2 of CC1 template
18	Accumulated other comprehensive income	2	2	Row 3 of CC1 template
	<b>Total shareholders' equity</b>	<b>€ 12,984</b>	<b>€ 12,984</b>	



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## Appendix II: Credit Risk Tables

The following tables present GSBE's credit risk exposures by exposure classes and by CCF and CRM impacts, by risk weights and by maturity respectively as of December 2023.

Table 56: EU CR4 - Standardised Approach - Credit Risk Exposure and CRM Effects

<i>€ in millions</i>		<i>As of December 2023</i>					
Exposure classes	Exposures before CCF and CRM		Exposures post CCF and CRM		RWEAs and RWEA density		
	On-balance-sheet amount	Off-balance-sheet amount	On-balance-sheet amount	Off-balance-sheet amount	RWEA	RWEA density	
1	Central governments or central banks	€ 15,164	-	€ 15,164	-	€ 246	1.62%
2	Regional government or local authorities	-	-	-	-	-	0.00%
3	Public sector entities	6	-	6	-	-	0.00%
4	Multilateral development banks	10	-	10	-	-	0.00%
5	International organisations	-	-	-	-	-	0.00%
6	Institutions	1,417	80	1,417	200	270	16.69%
7	Corporates	2,968	7,388	2,078	3,468	5,269	95.00%
8	Retail	-	-	-	-	-	0.00%
9	Secured by mortgages on immovable property	277	183	-	-	-	0.00%
10	Exposures in default	189	0	89	0	134	150.00%
11	Exposures associated with particularly high risk	-	-	-	-	-	0.00%
12	Covered bonds	-	-	-	-	-	0.00%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0.00%
14	Collective investment undertakings	-	-	-	-	-	0.00%
15	Equity	2	-	2	-	4	198.45%
16	Other items	267	-	267	-	267	100.00%
17	<b>TOTAL</b>	<b>€ 20,298</b>	<b>€ 7,650</b>	<b>€ 19,031</b>	<b>€ 3,669</b>	<b>€ 6,190</b>	<b>27.27%</b>

Total Credit RWA increased by €0.5bn over the course of 2023 mainly due to increase in lending activity by €0.7bn and commitments 0.1bn offset by decrease in Settlement risk by €0.3bn.

Table 57: EU CR1-A – Maturity of Exposures

<i>€ in millions</i>		<i>As of December 2023</i>					
		Net exposure value				No stated maturity	Total
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years		
1	Loans and advances	€ 24,173	€ 12,064	€ 944	€ 189	-	€ 37,370
2	Debt securities	-	-	-	-	-	-
3	<b>Total</b>	<b>€ 24,173</b>	<b>€ 12,064</b>	<b>€ 944</b>	<b>€ 189</b>	<b>-</b>	<b>€ 37,370</b>

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Table 58: EU CR5 – Standardised Approach

<i>€ in millions</i>													As of December 2023	
Exposure classes	Risk weight											Total	Of which unrated	
	0%	2%	20%	35%	50%	75%	100%	150%	250%	1250%	Others			
1 Central governments or central banks	€ 15,065	-	-	-	-	-	-	-	-	€ 99	-	-	€ 15,164	-
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	6	-	-	-	-	-	-	-	-	-	-	-	6	-
4 Multilateral development banks	10	-	-	-	-	-	-	-	-	-	-	-	10	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	19	613	783	-	202	-	-	-	-	-	-	-	1,617	-
7 Corporates	-	-	167	-	692	-	4,294	393	-	0	-	-	5,546	2,827
8 Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Exposures secured by mortgages on immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Exposures in default	-	-	-	-	-	-	-	89	-	-	-	-	89	89
11 Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Covered Bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Unit or share in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity exposures	-	-	-	-	-	-	1	-	1	-	-	-	2	2
16 Other items	-	-	-	-	-	-	267	-	-	-	-	-	267	267
<b>17 Total</b>	<b>€ 15,099</b>	<b>€ 613</b>	<b>€ 950</b>	<b>-</b>	<b>€ 894</b>	<b>-</b>	<b>€ 4,562</b>	<b>€ 482</b>	<b>€ 100</b>	<b>€ 0</b>	<b>-</b>	<b>€ 22,700</b>	<b>€ 3,185</b>	

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## Appendix III: Counterparty Credit Risk Tables

Table 59: EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

<i>€ in millions</i>													<i>As of December 2023</i>
Exposure classes		Risk weight											Total exposure value
		a	b	c	d	e	f	g	h	i	j	K	
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1	Central governments or central banks	€ 23	-	-	-	-	-	-	-	€ 1,511	-	-	€ 1,534
2	Regional government or local authorities	315	-	-	-	-	-	-	-	-	-	-	315
3	Public sector entities	300	-	-	-	4	0	-	-	-	-	-	304
4	Multilateral development banks	4	-	-	-	-	-	-	-	-	-	-	4
5	International organisations	43	-	-	-	-	-	-	-	-	-	-	43
6	Institutions	-	1,993	-	-	1,336	3,402	-	-	92	-	-	6,823
7	Corporates	-	-	-	-	173	5,215	-	-	6,645	150	-	12,183
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	21	-	21
11	<b>Total exposure value</b>	<b>€ 685</b>	<b>€ 1,993</b>	-	-	<b>€ 1,513</b>	<b>€ 8,617</b>	-	-	<b>€ 8,248</b>	<b>€ 171</b>	-	<b>€ 21,227</b>

\*The above table includes the exposure to CCPs.

Table 60: EU CCR5 – Composition of Collateral for CCR Exposures

<i>€ in millions</i>										<i>As of December 2023</i>
Collateral type		Collateral used in derivative transactions				Collateral used in SFTs				
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
1	Cash – domestic currency	€ 565	€ 10,813	€ 4	€ 16,489	-	€ 151	-	-	€ 69
2	Cash – other currencies	208	6,456	197	13,010	-	-	-	-	16
3	Domestic sovereign debt	1,221	912	38	195	-	3,414	-	-	2,548
4	Other sovereign debt	2,153	1,859	1,880	1,353	-	30,312	-	-	26,105
5	Government agency debt	31	-	0	-	-	-	-	-	-
6	Corporate bonds	116	-	14	-	-	1,035	-	-	1,361
7	Equity securities	1,220	-	47	-	-	2,198	-	-	5,894
8	Other collateral	-	-	2	-	-	1,317	-	-	1,488
9	<b>Total</b>	<b>€ 5,514</b>	<b>€ 20,040</b>	<b>€ 2,182</b>	<b>€ 31,047</b>	-	<b>€ 38,427</b>	-	-	<b>€ 37,481</b>

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## Appendix IV: Past Due Exposures, Impaired Exposures, and Impairment Provisions Tables

Table 61: EU CR1 – Performing and non-performing exposures and related provisions

€ millions													As of December 2023			
Gross carrying amount/nominal amount								Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					Accumulated partial write-off	Collateral and financial guarantees received		
Performing exposures			Non-performing exposures					Performing exposures – accumulated impairment and provisions		Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			On performing exposures	On non-performing exposures		
	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3					
1	Cash balances at central banks and other demand deposits	€ 15,481	€ 15,481	-	-	-	-	-	-	-	-	-	-	-	-	
2	Loans and advances	€ 37,254	€ 25,683	€ 56	€ 116	-	€ 116	€ (11)	€ (7)	€ (4)	€ (7)	-	€ (7)	-	€ 16,618	€ 38
3	Central banks	1,463	1	-	-	-	-	-	-	-	-	-	-	-	1,462	-
4	General governments	385	385	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Credit institutions	10,711	4,382	-	-	-	(1)	(1)	-	-	-	-	-	-	7,487	-
6	Other financial corporations	23,680	19,965	3	19	-	19	(1)	(1)	-	-	-	-	-	7,279	19
7	Non-financial corporations	764	699	53	97	-	97	(9)	(5)	(4)	(7)	-	(7)	-	200	19
8	Of which SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Households	251	251	-	-	-	-	(0)	(0)	-	-	-	-	-	190	-
10	Debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Off-balance-sheet exposures	€ 6,595	€ 6,375	€ 220	€ 0	-	€ 0	€ (13)	€ (10)	€ (3)	-	-	-	-	-	-
17	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Credit institutions	80	80	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Other financial corporations	665	665	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
21	Non-financial corporations	5,850	5,630	220	0	-	0	(12)	(9)	(3)	-	-	-	-	-	-
22	Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Total	€ 59,330	€ 47,539	€ 276	€ 116	-	€ 116	€ (24)	€ (17)	€ (7)	€ (7)	-	€ (7)	-	€ 16,618	€ 38

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Table 62: EU CQ3 – Credit quality of performing and non-performing exposures by past due days

€ millions		As of December 2023											
		Performing exposures			Gross carrying amount / Nominal amount								
			Not past due or Past due <= 30 days	Past due > 30 days <= 90 days		Non-performing exposures							Of which defaulted
Unlikely to pay that are not past-due or past-due <= 90 days	Past due > 90 days <= 180 days					Past due > 180 days <= 1 year	Past due > 1 year <= 2 years	Past due > 2 year <= 5 years	Past due > 5 year <= 7 years	Past due > 7 years			
005	Cash balances at central banks and other demand deposits	€ 15,481	€ 15,481	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	€ 37,254	€ 37,254	-	€ 116	€ 97	-	€ 19	-	-	-	-	€ 116
020	Central banks	1,463	1,463	-	-	-	-	-	-	-	-	-	-
030	General governments	385	385	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	10,711	10,711	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	23,680	23,680	-	19	-	-	19	-	-	-	-	19
060	Non-financial corporations	764	764	-	97	97	-	-	-	-	-	-	97
070	Of which SMEs	-	-	-	-	-	-	-	-	-	-	-	-
080	Households	251	251	-	-	-	-	-	-	-	-	-	-
090	Debt Securities	-	-	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	-	-	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
150	Off-balance sheet exposures	€ 6,595	-	-	€ 0	-	-	-	-	-	-	-	€ 0
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	80	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	665	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	5,850	-	-	0	-	-	-	-	-	-	-	0
210	Households	-	-	-	-	-	-	-	-	-	-	-	-
220	Total	€ 59,330	€ 52,735	-	€ 116	€ 97	-	€ 19	-	-	-	-	€ 116

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Table 63: EU CQ1 – Credit quality of forborne exposures

€ millions		As of December 2023							
		Gross carrying amount/nominal amount of exposures with forbearance measures			Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures		
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures		
			Of which defaulted	Of which impaired					
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	-	48	48	48	-	(5)	19	19
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	-	-	-	-	-	-	-	-
060	Non-financial corporations	-	48	48	48	-	(5)	19	19
070	Households	-	-	-	-	-	-	-	-
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	0	0	0	-	-	-	-
100	Total	-	€ 48	€ 48	€ 48	-	€ (5)	€ 19	€ 19

Table 64: EU CQ4 - Quality of non-performing exposures by geography

€ millions		As of December 2023						
		a	b	c	d	e	f	g
		Gross carrying/Nominal amount			of which: subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		of which: non-performing		of which: defaulted				
010	On balance sheet exposure	€ 37,370	-	€ 116	-	€ (18)	-	-
020	United Kingdom	14,118	-	-	-	(3)	-	-
030	France	9,020	-	29	-	(1)	-	-
040	United States	4,737	-	-	-	(0)	-	-
050	Germany	2,357	-	-	-	(0)	-	-
060	Netherlands	2,022	-	19	-	(6)	-	-
070	Other countries	5,116	-	68	-	(8)	-	-
080	Off balance sheet exposures	€ 6,595	-	€ 0	-	-	(13)	-
090	France	2,361	-	0	-	-	(2)	-
100	Germany	1,031	-	-	-	-	(2)	-
110	Italy	851	-	-	-	-	(2)	-
120	Netherlands	695	-	-	-	-	(1)	-
130	United Kingdom	435	-	-	-	-	(2)	-
140	Other countries	1,222	-	-	-	-	(4)	-
150	Total	€ 43,965	-	€ 116	-	€ (18)	€ (13)	-

Higher of top 5 countries or countries representing greater than 50% of total exposure have been specifically reported in the table above.

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Table 65: EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry

<i>€ millions</i>						As of December 2023
		Gross carrying amount		Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non- performing exposures
		Of which non-performing	Of which defaulted			
010	Agriculture, forestry and fishing	€ 22	-	-	€ (0)	-
020	Mining and quarrying	0	-	-	-	-
030	Manufacturing	220	-	48	(9)	-
040	Electricity, gas, steam and air conditioning supply	49	-	-	(0)	-
050	Water supply	0	-	-	-	-
060	Construction	25	-	-	(0)	-
070	Wholesale and retail trade	107	-	0	(1)	-
080	Transport and storage	15	-	-	-	-
090	Accommodation and food service activities	0	-	-	-	-
100	Information and communication	49	-	-	(1)	-
110	Financial and insurance activities	-	-	-	-	-
120	Real estate activities	80	-	49	(3)	-
130	Professional, scientific and technical activities	98	-	-	(1)	-
140	Administrative and support service activities	107	-	-	(1)	-
150	Public administration and defence, compulsory social security	-	-	-	-	-
160	Education	-	-	-	-	-
170	Human health services and social work activities	38	-	-	(0)	-
180	Arts, entertainment and recreation	31	-	-	(1)	-
190	Other services	20	-	-	-	-
<b>200</b>	<b>Total</b>	<b>€ 861</b>	<b>-</b>	<b>€ 97</b>	<b>€ (17)</b>	<b>-</b>

Table 66: EU CR2 – Changes in the stock of non-performing loans and advances

<i>€ millions</i>		As of December 2023
		Gross carrying amount
<b>010</b>	<b>Initial stock of non-performing loans and advances</b>	<b>-</b>
020	Inflows to non-performing portfolios	116
030	Outflows from non-performing portfolios	-
040	Outflows due to write-offs	-
050	Outflow due to other situations	-
<b>060</b>	<b>Final stock of non-performing loans and advances</b>	<b>€ 116</b>

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5	EU INS2-Financial conglomerates information on own funds and capital adequacy ratio <sup>1</sup>	NA	NA
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23	EU CR6-A-Scope of the use of IRB and SA approaches <sup>2</sup>	NA	NA
24	EU CR7-IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques <sup>2</sup>	NA	NA
25	EU CR7-A-IRB approach – Disclosure of the extent of the use of CRM techniques <sup>2</sup>	NA	NA
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28	EU CR9.1-Back-testing of PD per exposure class (only for PD estimates according to Article 180(1)(f)) <sup>2</sup>	NA	NA
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<sup>1</sup> These templates have not been disclosed as GSBE has no reportable values.

<sup>2</sup> These templates have not been disclosed as GSBE does not have permission to use IRB.

<sup>3</sup> These templates have not been disclosed pursuant to guidance on disclosure as per EBA/GL/2018/06 and pursuant to Article 8 of Commission Implementing Regulation (EU) 2021/637

<sup>4</sup> Information pertaining to this template has been disclosed within the Basis of Consolidation section of the document.

<sup>5</sup> These templates have not been disclosed as GSBE has not met the criteria for applicability of a resolution entity.

Templates disclosed in this document are according to Implementing Technical Standards on institutions' public disclosures of the information referred to in Titles II and III of Part Eight of CRR.