Scotiabank (Ireland) Designated Activity Company

Pillar 3 Disclosures

As at 31st October 2021

Table of Contents

1 Introduction ... 6
1.1 Background ... 6
1.2 Key Changes in the 2021 Pillar 3 Disclosures ... 6
1.3 COVID-19 Pandemic ... 6
1.4 Policy and Scope of Disclosure (Article 431(3)) ... 7
1.5 Attestation by Member of Senior Management (Article 431(3)) ... 7
1.6 Business Overview ... 13
1.7 Business Results and Key Performance Indicators ... 14
1.8 Future Developments ... 14
2 Capital Adequacy ... 15
2.1 Capital Management (Article 438(a),(c)) ... 15
2.2 Minimum Regulatory Capital Requirement (Pillar 1) ... 16
2.3 Internal Capital Adequacy Assessment Process (Pillar 2) ... 16
2.4 Leverage Ratio ... 21
3 Risk Management ... 23
3.1 Risk Governance ... 24
3.1.1 The Board of Directors ... 25
3.1.2 Nomination and Directorship ... 25
3.1.3 Board Committees ... 27
3.1.4 Senior Management ... 27
3.1.5 Governance Structure ... 28
3.2 Risk Appetite ... 29
3.3 Risk Management Tools ... 30
3.4 Risk Identification and Assessment ... 31
3.5 Risk Culture ... 32
3.6 Statement of Internal Controls ... 32
4 Credit Risk ... 33
4.1 Credit Risk Management and Risk Measures ... 33
4.2 Approaches to Credit Risk ... 34
4.3 Credit Profile of Exposures ... 35
4.4 Credit Risk Mitigation ... 43
4.5 Counterparty Credit Risk ... 47
4.6 Credit Risk Stress Testing ... 50
4.7 Wrong-way Risk ... 50
5 Market Risk and Interest Rate Risk in the Banking Book (IRRBB) ... 51
5.1 Risk management objectives and policies ... 51
5.2 Market Risk Governance Process ... 51
5.3 Scope and Nature of Risk Reporting Measurement Systems ... 51
5.4 Measurement and Reporting of Individual Market Risk ... 51
5.4.1 Interest Rate Risk ... 51
5.4.2 Foreign Exchange Risk ... 52
5.4.3 Credit Spread Risk ... 52
5.5 Policies for Hedging and Mitigating Market Risk ... 53
5.6 Disclosure of the Exposure to Interest Rate Risk on Positions not Held in the Trading Book (Article 448) ... 53
6 Operational Risk ... 54

6.1 Operational Risk Management and Risk Measures 54
6.2 Methodology and Approaches to Operational Risk 55
6.3 Operational Risk Mitigation 56
6.4 Operational Risk Stress Testing 56
7 Cyber Security & Information Technology risk 56
8 Compliance Risk and Conduct Risk 56
8.1 Governance and Controls 57
9 Environmental and Climate Risk 58
10 Liquidity and Funding Risk 58
10.1 Liquidity Risk Management Qualitative Disclosures (Article 451a(4)) 58
10.2 Additional Qualitative Information on LCR (Article 451a(2)) 61
11 Concentration Risk 66
11.1 Concentration Risk Management and Risk Measures 66
11.2 Concentration Risk Mitigation 66
12 Securitisations (Article 449) 66
13 Asset Encumbrance (Article 443) 69
14 Remuneration 71
14.1 Qualitative Disclosure 71
14.1.1 Governance 71
14.1.2 Material Risk Taker Criteria 73
14.1.3 Link between pay and performance 73
14.1.4 Design and Structure of Remuneration 74
14.1.5 Annual Incentives (Upfront Variable Remuneration) 75
14.1.6 Deferral Incentives (Deferred Variable Remuneration) 76
14.1.7 Risk Management and Risk Adjustment 77
14.2 Quantitative Disclosure 79
14.2.1 Material Risk Takers 79
15 Appendix 1 – CRR Roadmap 84
16 Appendix 2 – Excluded Templates 92
17 Appendix 3 – Geographical Disclosures 92
18 Appendix 4 – Main features of the Company's capital instruments 93

Index of tables

Table 1 – EU LI1 – Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories (Article 436(c)) ... 8

Table 2 – EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements (Article 436(d)) ... 9

Table 3 – EU CC2 reconciliation of regulatory own funds to balance sheet in the audited financial statements (Article 437(a)) ... 10

Table 4 – EU CC1 - Composition of regulatory own funds (Article 437(a), (d), (e) & (f)) ... 11

Table 5 – EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (Article 440(1)(a)) ... 17

Table 6 – EU CCyB2 - Amount of institution-specific countercyclical capital buffer (Article 440(1)(b)) ... 18

Table 7 – EU OV1 – Overview of total risk exposure amounts (Article 438(d)) ... 19

Table 8 – EU KM1 - Key metrics template (Article 447) ... 20

Table 9 – EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures (Article 451(1)(b)) ... 21

Table 10 – EU LR2 - LRCom: Leverage ratio common disclosure (Article 451(1)(a) & (b)) ... 21

Table 11 – EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) (Article 451(1)(b)) ... 23

Table 12 – 2021 Members of the Board of Directors ... 25

Table 13 – Directors knowledge, skills and expertise ... 26

Table 14 – Directorships ... 27

Table 15 – Risk Appetite Metrics ... 29

Table 16 – Internal Grading Cross Reference ... 34

Table 17 – EU CR1 - Performing and non-performing exposures and related provisions (Article 442(c) & (d)) ... 36

Table 18 – EU CR1-A - Maturity of exposures (Article 442(g)) ... 38

Table 19 – EU CR2 - Changes in the stock of non-performing loans and advances (Article 442(f)) ... 38

Table 20 – EU CQ4 - Quality of non-performing exposures by geography (Article 442(c) & (d)) ... 38

Table 21 – EU CQ3 - Credit quality of performing and non-performing exposures by past due days (Article 442(d)) ... 39

Table 22 – EU CR5 – Standardised approach (Article 444(e)) ... 41

Table 23 – EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry (Article 442(c) & (e)) ... 43

Table 24 – EU CR3 - CRM techniques overview: Disclosure of the use of credit risk mitigation techniques (Article 453(f)) ... 43

Table 25 – EU CR4 – Standardised approach – Credit risk exposure and CRM effects (Article 453 (g), (h) & (i)) ... 45

Table 26 – EU CQ1 – Credit quality of forborne exposures (Article 442 (c)) ... 46

Table 27 – EU CCR5 – Composition of collateral for exposures to CCR (Article 439(e)) ... 47

Table 28 – EU CCR1 – Analysis of CCR exposure by approach (Article 439(f), (g) & (k)) ... 48

Table 29 – EU CCR2 – Transactions subject to own funds requirements for CVA risk (Article 439(h)) ... 49

Table 30 – EU CCR3 – CCR exposures by regulatory portfolio and risk weight – Standardised Approach (Article 444(e)) ... 49

Table 31 – EU CCR8 – Exposures to CCPs (Article 439(i)) ... 50

Table 32 – EU MR1 – Market Risk under the Standardised Approach (Article 445) ... 52

Table 33 – EU IRRBB1 – Interest rate risks of non-trading book activities (Article 448(1)(a),(b)) ... 54

Table 34 – EU OR1 – Operational risk own funds requirements and risk-weighted exposure amounts (Article 446) ... 55
Table 35 – EU LIQ1 – Liquidity Coverage Ratio (LCR) disclosure template (Article 451a (2)) ... 63
Table 36 – EU LIQ2 – Net Stable Funding Ratio (Art 451a (3)) ... 64
Table 37 – EU SEC1 - Securitisation exposures in the non-trading book (Article 449(j)) ... 68
Table 38 – EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor (Article 449(k)) ... 68
Table 39 – EU AE1 – Encumbered and unencumbered assets ... 69
Table 40 – EU AE2 – Collateral received and own debt securities issued ... 70
Table 41 – EU AE3 – Sources of encumbrance ... 70
Table 42 – EU REM1 – Remuneration awarded for the fiscal year (Article 450(1)(h)(i)-(ii)) ... 79
Table 43 – EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (Article 450(1)(h)(v)-(vii)) ... 80
Table 44 – EU REM3 – Deferred remuneration (Article 450(1)(h)(iii)-(iv)) ... 81
Table 45 – EU REM4 – Remuneration of 1 million EUR or more per year (Article 450(1)(i)) ... 82
Table 46 – EU REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (Article 450(1)(g)) ... 82
Table 47 – CRR Roadmap ... 84
Table 48 – EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments (Article 437 (b) & (c)) ... 93

1 Introduction

1.1 Background

Scotiabank (Ireland) Designated Activity Company ("SIDAC" or the "Company"), is subject to Irish and European Union legislation which seeks to stabilise and strengthen the EU financial system by ensuring that institutions, including the Company, hold adequate capital to meet the potential impact of the risks to which they are exposed. As part of this capital adequacy regime, institutions are required to publicly disclose specified information ("Pillar 3 disclosures") to enable market participants to understand how an institution implements the applicable legislation. This report represents the Company's Pillar 3 disclosures as at 31 October 2021 as required under the Capital Requirements Directive (Directive 2013/36/EU) ("CRD"), the Capital Requirements Regulation (Regulation (EU) No. 575/2013) ("CRR") and associated implementing legislation along with guidelines issued by the European Banking Authority ("EBA"). The Company is required to disclose this information on an annual basis.

1.2 Key Changes in the 2021 Pillar 3 Disclosures

The recent revisions to the CRD and CRR (known as CRD V and CRR 2 respectively), which mostly took effect on 28 June 2021 included a mandate for the EBA to introduce uniform disclosure formats via Implementing Technical Standards ("ITS"). These changes are reflected in these disclosures, the impact of which are new and revised disclosure templates and accompanying qualitative disclosures. Comparatives are provided except where a template is substantially new and reported for the first time.

Other key regulatory obligations introduced by CRR 2 revisions which impact the Company and the information in these disclosures are:

- *Binding Leverage Ratio*: CRR 2 broadly reflects the Basel leverage ratio. It sets the Tier 1 capital-based leverage ratio requirement at 3% for all EU banks as per the EBA's recommendation.
- *Net Stable Funding Ratio*: CRR 2 requires banks to maintain minimum available stable funding of at least 100% of their required stable funding to ensure that asset exposures are broadly matched with stable funding sources. See section 9.2 for more detail.
- *Standardised Approach for Counterparty Credit Risk ("SA-CCR")*: The new approach is a more risk sensitive measure of counterparty risk reflecting netting, hedging and collateral benefits, as well as being better calibrated to observed volatilities.

1.3 COVID-19 Pandemic

With populations largely vaccinated, any future waves of the virus are expected to have minor impacts on the economic outlook as governments seem unlikely to reintroduce wide-ranging mobility restrictions in the event additional COVID-19 waves materialise. In addition, most economies are experiencing solid economic recoveries, with healthy household and corporate balance sheets, and strong employment growth. This should provide an additional layer of protection against the potential consequences of new surges in the virus. There remains, nonetheless ongoing impacts from COVID-19 in economies. Unemployment is well above pre-COVID levels in several countries, and the sectors most heavily affected by COVID since its outset continue to operate well below pre-pandemic levels.

Early in the pandemic when financial markets were under severe stress monitoring of funding markets and client activity was heightened and continues to be monitored. Focus has been maintained on continued and constant communication between business groups, risk management, and head-office teams. Given the nature of the Company's business it monitors the macro-economic and geopolitical landscape as well as the ongoing impact of the current COVID-19 pandemic. Notwithstanding the ongoing uncertainty surrounding these areas the Company will address any challenges or opportunities that may result. Future business plans have been prepared in the context of the uncertainty created by COVID-19.

The Company is required to report any EBA payment moratoria to the Central Bank of Ireland ("CBI") and as at 31 October 2021 a nil return was submitted. The disclosure templates are similarly all NIL and so not included in these disclosures.

1.4 Policy and Scope of Disclosure (Article 431(3))

These Pillar 3 disclosures are prepared on an unconsolidated / individual basis. They are disclosed on an annual basis in line with the financial statements and are published on the Company's website at the following location: https://www.gbm.scotiabank.com/en/legal/ireland-policies-and-disclosures.html. The Company maintains a formal policy to comply with the disclosure requirements laid out in CRR and CRD including the assessment of the appropriateness of the disclosures, their verification, and the frequency on which the disclosures are made. Disclosures required under Pillar 3 are only incorporated if they are deemed relevant and material for the Company and if their omission or misstatement would change or influence the assessment or decision of a user relying on the information. Information regarded as proprietary or confidential has been excluded from this document, as per Article 432 of the CRR.

The information provided in this document is not required to be subject to an external audit. These disclosures do not constitute any form of a Financial Statement and should not be relied upon in making any financial or investment decision. The disclosures have been checked for consistency with existing risk reports and appropriateness against the disclosure requirements and have been reviewed by authorised Senior Management representatives. The disclosures have been deemed adequate, both in terms of frequency and level of detail, to convey SIDAC's risk profile comprehensively to market participants.

These disclosures are prepared in line with Commission Implementing Regulation (EU) 2021/637 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of the CRR. Any templates which have not been disclosed due to applicability are listed in Appendix 2 along with the reason.

1.5 Attestation by Member of Senior Management (Article 431(3))

"I confirm that SIDAC has made the disclosures required under Part Eight of CRR in accordance with its formal policies and internal processes, systems and controls".

Mark Allen (Chief Financial Officer)

Table 1 – EU LI1 – Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories (Article 436(c))

	31 Oct 2021						**31 Oct 2020**					
		Carrying values of items						Carrying values of items				
US$'000	Carrying values under scope of prudential consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	[(1)] Subject to the market risk framework	Not subject to capital requirements or subject to deduction from capital	Carrying values under scope of prudential consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	[(1)] Subject to the market risk framework	Not subject to capital requirements or subject to deduction from capital
Assets												
Cash and balances at central banks	492,818	492,818	-	-	-	-	420,479	420,479	-	-	-	-
Loans and advances to banks	15,386	15,386	-	-	-	-	10,102	10,102	-	-	-	-
Loans and advances to customers	1,030,713	720,603	-	310,110	-	-	1,647,920	1,356,149	-	291,771	-	-
Investment securities measured at FVOCI	1,887,319	1,887,319	-	-	-	-	1,591,017	1,591,017	-	-	-	-
Investment securities measured at amortised cost	-	-	-	-	-	-	407,901	407,901	-	-	-	-
Investment securities mandatorily measured at FVTPL	46,153	1,636	-	44,517	-	-	58,225	13,671	-	44,554	-	-
Derivative financial instruments	41,016	-	41,016	-	-	-	13,074	-	13,074	-	-	-
Tangible fixed assets	622	622	-	-	-	-	453	453	-	-	-	-
Intangible assets	81	-	-	-	-	81	279	-	-	-	-	279
Deferred taxation assets	939	939	-	-	-	-	193	193	-	-	-	-
Other assets	1,697	1,697	-	-	-	-	2,561	2,561	-	-	-	-
Prepayments and accrued income	10,066	8,012	-	2,054	-	-	15,194	13,144	-	2,050	-	-
Right-of-use assets	5,637	5,637	-	-	-	-	6,807	6,807	-	-	-	-
Total assets	**3,532,447**	**3,134,669**	**41,016**	**356,681**	**-**	**81**	**4,174,205**	**3,822,477**	**13,074**	**338,375**	**-**	**279**
Liabilities												
Deposits by banks	167,976	29,346	-	-	-	138,630	306,583	-	-	-	-	306,583
Customer accounts	2,211	-	-	-	-	2,211	30,616	-	-	-	-	30,616
Derivative financial instruments	8,168	-	8,168	-	-	-	60,751	-	60,751	-	-	-
Debt securities in issue	1,543,602	-	-	-	-	1,543,602	2,014,615	-	-	-	-	2,014,615
Current taxation liabilities	238	-	-	-	-	238	1,349	-	-	-	-	1,349
Accruals, deferred income & other liabilities	32,475	-	5,211	-	-	27,264	26,058	-	7,363	-	-	18,695
Net retirement benefit liabilities	5,676	-		-	-	5,676	8,866	-		-	-	8,866
Lease liabilities	5,566	-	-	-	-	5,566	6,728	-	-	-	-	6,728
Total liabilities	**1,765,912**	**29,346**	**13,379**	**-**	**-**	**1,723,187**	**2,455,566**	**-**	**68,114**	**-**	**-**	**2,387,452**

As the Company does not have an active trading book all remaining market risk relates to FX in the banking book. At 31 October 2021 the FX risk exposure was US$ 15,935,000 (2020: US$ 65,519,000) with an associated capital charge of US$ 1,275,000 (2020: US$ 5,542,000).

The above template EU LI1 provides a mapping of financial statement categories under the regulatory scope of consolidation to regulatory risk categories, as at 31 October 2021. The Company's balance sheet prepared under both statutory and prudential scopes of consolidation are the same.

Table 2 – EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements (Article 436(d))

31 Oct 2021

	US$'000	Total	Items subject to Credit risk framework	CCR framework	Securitisation framework	Market risk framework [1]
1	**Assets carrying value amount under the scope of prudential consolidation (as per template LI1)**	**3,532,366**	**3,134,669**	**41,016**	**356,681**	**-**
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	**(42,725)**	**(29,346)**	**(13,379)**	**-**	**-**
3	Total net amount under the scope of prudential consolidation	**3,489,641**	**3,105,323**	**27,637**	**356,681**	**-**
4	Off-balance-sheet amounts	2,870,385	2,870,385	-	-	
5	*Differences in valuations*	-	-	-	-	
6	*Differences due to different netting rules, other than those already included in row 2*	150,069	69,946	80,123	-	
7	*Differences due to consideration of provisions*	(123)	(123)	-	-	
8	*Differences due to the use of credit risk mitigation techniques (CRMs)*	(85,334)	(27,456)	(57,878)	-	
9	*Differences due to credit conversion factors*	(1,443,070)	(1,443,070)	-	-	
10	*Differences due to Securitisation with risk transfer*	-	-	-	-	
11	*Other differences*	(1,637)	(1,637)	-	-	
12	**Exposure amounts considered for regulatory purposes**	**4,979,931**	**4,573,368**	**49,882**	**356,681**	**-**

31 Oct 2020

	US$'000	Total	Items subject to Credit risk framework	CCR framework	Securitisation framework	Market risk framework [1]
1	**Assets carrying value amount under the scope of prudential consolidation (as per template LI1)**	**4,173,926**	**3,822,477**	**13,074**	**338,375**	**-**
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	**(68,114)**	**-**	**(68,114)**	**-**	**-**
3	Total net amount under the scope of prudential consolidation	**4,105,812**	**3,822,477**	**(55,040)**	**338,375**	**-**
4	Off-balance-sheet amounts	2,096,536	2,096,536	-	-	
5	*Differences in valuations*					
6	*Differences due to different netting rules, other than those already included in row 2*	(1,321)	0	(1,321)	0	
7	*Differences due to consideration of provisions*					
8	*Differences due to the use of credit risk mitigation techniques (CRMs)*			68,144		
9	*Differences due to credit conversion factors*	(1,073,560)	(1,073,560)			
10	*Differences due to Securitisation with risk transfer*					
11	*Other differences*	(1,930)	(1,930)			
12	**Exposure amounts considered for regulatory purposes**	**5,193,651**	**4,843,523**	**11,753**	**338,375**	**-**

The above template outlines the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation and the exposure amount used for regulatory purposes. These are:

- Off balance sheet items included as an exposure value for regulatory purposes;
- The netting effects of recognition of GMRA agreements in the calculation of regulatory exposures amounts due to Securities Financing Transactions (SFT) (repurchase transactions);
- The following effects recognised in the calculation of Derivative exposure amounts:

- The fundamental differences in the basis of the SA-CCR calculations vs. IFRS and the netting effects of recognition of ISDA agreements.
- The inclusion of derivatives with negative fair value which have been recorded in balance sheet liabilities.

As noted above, the Company's balance sheet prepared for both statutory and regulatory scope of consolidation are the same. The below table includes a cross-reference to the corresponding rows in template EU CC1 to facilitate full reconciliation of accounting and regulatory own funds.

Table 3 – EU CC2 reconciliation of regulatory own funds to balance sheet in the audited financial statements (Article 437(a))

31 Oct 2021

US$'000		**Balance sheet as in published financial statements and as per regulatory scope of consolidation**	**Reference**
Assets - *Breakdown by asset classes according to the balance sheet in the published financial statements*			
1	Cash and balances at central banks	492,818	
2	Loans and advances to banks	15,386	
3	Loans and advances to customers	1,030,713	
4	Investment securities measured at FVOCI	1,887,319	
5	Investment securities measured at amortised cost	-	
6	Investment securities mandatorily measured at FVTPL	46,153	
7	Derivative financial instruments	41,016	
8	Tangible fixed assets	622	
9	Intangible assets	81	
9a	*Of which are deducted from Own funds*	*49*	8
10	Deferred taxation assets	939	
11	Other assets	1,697	
12	Prepayments and accrued income	10,066	
13	Right-of-use assets	5,637	
14	**Total assets**	**3,532,447**	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published financial statements*			
15	Deposits by banks	167,976	
16	Customer accounts	2,211	
17	Derivative financial instruments	8,168	
18	Debt securities in issue	1,543,602	
19	Current taxation liabilities	238	
20	Accruals, deferred income & other liabilities	32,475	
21	Net retirement benefit liabilities	5,676	
22	Lease liabilities	5,566	
23	**Total liabilities**	**1,765,912**	
Shareholders' Equity			
24	Called-up share capital	80,000	1, 46
25	Capital contribution reserve	12,194	3
26	Retained earnings	1,678,005	2
27	Other reserves	(3,664)	3
28	**Total shareholders' equity**	**1,766,535**	

The following template provides a breakdown of the constituent elements of the Company's regulatory own funds including a cross reference to the corresponding rows in template EU CC2 to facilitate full reconciliation of accounting and regulatory own funds. Total capital decreased slightly by US$ 3mm while RWA decreased by US$ 423mm (↓ 12%). The combined effect of these movements was an increase in total capital ratio of 6.6% to 55.7% at 31 October 2021. Further information the composition of and movement in RWA is provided in template EU OV1 below.

Table 4 – EU CC1 - Composition of regulatory own funds (Article 437(a), (d), (e) & (f))

US$'000

		31 Oct 2021	Reference	31 Oct 2020
	Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	40,000	24	40,000
	of which: Ordinary Shares	40,000		40,000
2	Retained earnings	1,678,005	26	1,632,385
3	Accumulated other comprehensive income (and other reserves)	8,530	27	13,617
EU-3a	Funds for general banking risk	-		-
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-		-
5	Minority interests (amount allowed in consolidated CET1)	-		-
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-		-
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**1,726,535**		**1,686,002**
	Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(1,703)		(1,723)
8	Intangible assets (net of related tax liability) (negative amount)	(42)	9a	(279)
9	Not applicable in EU regulation			-
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) CRR are met) (negative amount)	-		-
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-		-
12	Negative amounts resulting from the calculation of expected loss amounts	-		-
13	Any increase in equity that results from securitised assets (negative amount)	-		-
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-		-
15	Defined-benefit pension fund assets (negative amount)	-		-
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-		-
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)	-		-
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)	-		-
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)	-		-
20	Not applicable in EU regulation			
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-		-
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-		-
EU-20c	of which: securitisation positions (negative amount)	-		-
EU-20d	of which: free deliveries (negative amount)	-		-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-		-
22	Amount exceeding the 17,65% threshold (negative amount)	-		-
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	-		-
24	Not applicable in EU regulation	-		-
25	of which: deferred tax assets arising from temporary differences	-		-
EU-25a	Losses for the current financial year (negative amount)	-		-
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)	-		-
26	Not applicable in EU regulation			
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-		-
27a	Other regulatory adjustments	-		-
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	(1,745)		(2,002)
29	**Common Equity Tier 1 (CET1) capital**	**1,724,790**		**1,684,000**
	Additional Tier 1 (AT1) capital: instruments			
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) CRR and the related share premium accounts subject to phase out from AT1	-		-
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-		-
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR 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	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**-**		**-**
	Additional Tier 1 (AT1) capital: regulatory adjustments			

US$'000		31 Oct 2021	Reference	31 Oct 2020
37	Direct, indirect and synthetic 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 in EU regulation	-		-
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-		-
42a	Other regulatory adjustments to AT1 capital	-		-
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**		**-**
44	**Additional Tier 1 (AT1) capital**	**-**		**-**
45	**Tier 1 capital (T1 = CET1 + AT1)**	**1,724,790**		**1,684,000**
	Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	40,000	24	40,000
47	Amount of qualifying items referred to in Article 484(5) CRR 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) CRR subject to phase out from T2	-		-
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR 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	**Tier 2 (T2) capital before regulatory adjustments**	**40,000**		**40,000**
	Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic 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, indirect and synthetic 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 in EU regulation			
55	Direct, indirect and synthetic 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 in EU regulation			
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-		-
EU-56b	Other regulatory adjustments to T2 capital	-		-
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**-**		**-**
58	**Tier 2 (T2) capital**	**40,000**		**40,000**
59	**Total capital (TC = T1 + T2)**	**1,764,790**		**1,724,000**
60	**Total Risk exposure amount**	**3,089,798**		**3,512,964**
	Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	55.82%		47.94%
62	Tier 1 capital	55.82%		47.94%
63	Total capital	57.12%		49.08%
64	Institution CET1 overall capital requirements	13.92%		11.04%
65	of which: capital conservation buffer requirement	2.50%		2.50%
66	of which: countercyclical capital buffer requirement	0.02%		0.01%
67	of which: systemic risk buffer requirement	-		-
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	-		-
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	-		-
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	49.12%		41.08%
	National minima (if different from Basel III)			
69	Not applicable in EU regulation			
70	Not applicable in EU regulation			
71	Not applicable in EU regulation			
	Amounts below the thresholds for deduction (before risk weighting)			
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)			

US$'000		31 Oct 2021	Reference	31 Oct 2020
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)	-		-
74	Not applicable in EU regulation			
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) CRR are met)	-		-
	Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-		-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-		-
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	-		-
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
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)	-		-
82	Current cap on AT1 instruments subject to phase out arrangements	-		-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-		-
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)	-		-

Retained earnings in row 2 includes the Company's profit for the year.

1.6 Business Overview

The Company, which holds a banking licence, is incorporated in Ireland and is a wholly owned subsidiary of BNS International (Bahamas) Limited ("BNSI") which is incorporated in the Bahamas. BNSI is wholly owned by The Bank of Nova Scotia ("Scotiabank" or "BNS") which is incorporated in Canada.

The primary activities of the Company are International Corporate Lending, Capital Markets and Treasury activities providing funding and adhering to liquidity requirements. The strategy behind the Company's activities is focused on serving priority, multi-regional clients, aligned with Scotiabank's core markets and industry focus.

Following a decision made in 2020 to expand the Company's role to become the Scotiabank hub for Capital Markets in the EEA; an implementation project and a CBI licence expansion notification process was completed in 2021. New business commenced in October 2021, however the level of trading for fiscal 2021 was minimal due to this starting date.

The Company is part of the Scotiabank's Global Banking and Markets ("GBM") business line. GBM provides corporate clients with lending and transaction services, investment banking advice and access to capital markets. GBM is a full-service wholesale bank in the Americas, with operations in 21 countries, serving clients across Canada, the United States, Latin America, Europe and Asia-Pacific.

The primary purpose of the GBM European businesses is to advance GBM's strategic priorities by serving priority, multi-regional clients, aligned with its core markets (the "Americas") and industry focus.

The Company's strategy is aligned to that of GBM and contributes to Scotiabank and GBM's European strategy through the provision of Corporate Banking and Capital Markets activities.

- Corporate Banking with the objective of being a lead banking partner to corporate clients by leveraging Scotiabank's sector and product expertise and connecting the offering across the 'Americas' footprint.
- Capital Markets with the objective of continuing to leverage Scotiabank's presence in Europe for distribution of the 'Americas' product and support multi-regional clients with investment flows to and from the 'Americas'.

Corporate Banking

Corporate Banking offers Corporate Lending products and Standby Letters of Credit ("SBLCs") products and services and is currently the most significant component of the Company's business activities, focused on global EEA clients which operate in a similar core footprint to Scotiabank (the Americas) while leveraging global product and sector expertise to expand European corporate coverage.

Generally, clients are either the parent or a subsidiary of large corporate groups or large infrastructure projects in targeted industry sectors. Opportunities are considered by considering the return on a relationship basis which includes lending revenues as well as revenues from other products globally. At SIDAC, the focus is on a range of industries with increasing focus on Healthcare, Technology, Consumer Products, and Industrials.

Capital Markets

The Capital Markets function has primarily two desks: Fixed Income and Currencies, and Equities.

Fixed Income and Currencies covers the following activities: Fixed income cash; Fixed income derivatives; Debt capital markets; Foreign exchange; Collateral management and funding.

The Equities desk covers Equity derivatives and Prime services.

Capital Markets is a customer-facing business line and its strategic priorities are to scale up its presence in both Fixed Income and Equities and to drive cross-sell by:

- coordinating with Corporate Banking to leverage GBM's lending relationships to advance the distribution priorities for Capital Markets' products; and
- synchronising efforts across GBM to identify strategic product initiatives that align with EEA investor mandates.

Treasury

The Company is an unrated subsidiary of BNS and is reliant on its parent/affiliates for funding. The Treasury function within SIDAC is responsible for two main sets of activities: 1) liquidity and funding management, and 2) market risk management.

- Liquidity and funding is managed to minimise the cost of funding of the Company's balance sheet using available funding sources such as capital, negotiable certificates of deposits, constant maturity notice deposits, term deposits and repo. This is managed to ensure appropriate funding to the business lines whilst maintaining compliance with internal risk and regulatory requirements.
- Market risk is managed in relation to the structural interest rate and foreign exchange risks ensuring that SIDAC is operating within its Board-approved risk appetite.

SIDAC's Treasury activity is non-customer facing and as such, it does not have target client segments or industries.

1.7 Business Results and Key Performance Indicators

The level of business, performance and the year-end financial position were satisfactory. The Company recorded a profit for the year ended 31 October 2021 of US$43,615,000 which was a decrease of 28.3% from the previous year. The main reasons for this decrease were the impact of lower interest rates on income from earning assets and an increase in administrative expenses mainly due to front office and support functions staff costs related to the introduction and start-up of the new Capital Markets businesses in fiscal 2021. Apart from lower interest rates and the increase in administrative costs, there were no other material impacts caused by the ongoing COVID-19 global pandemic. Other Key Performance Indicators are:

	2021	2020
Return on Regulatory Capital Employed	6.1%	7.6%
Return on Equity (ROE)	2.5%	3.6%
Productivity Ration	35.0%	22.0%
Net Interest Margin	2.0%	2.1%

1.8 Future Developments

Business Growth

As outlined above the Company has started a new capital markets business and a focus for the year ahead will be to build this business. We expect this business to add to balance sheet assets and to increase revenues.

The Company's corporate loan portfolio is expected to moderately increase in size and slightly increase its credit risk profile over the short-term. Activity in the Company's investment portfolios is difficult to predict given their dependence on market conditions. New initiatives that fit within current risk appetite will be considered. The Directors expect the remaining general level of activity to continue for the foreseeable future and earning asset levels are expected to increase over the short-term due mainly to the build-out of the capital markets business and increases in the corporate loan portfolio.

Climate Risk

Under its mandate from Article 434a of the CRR to develop draft ITS specifying uniform disclosure formats, amendments to the ITS on public disclosures are expected from the EBA in 2022. These would put forward the tables, templates and associated instructions that certain large institutions (which have issued securities that are admitted to trading on a regulated market of any Member State) must use in order to disclose relevant qualitative information on Environmental, Social and Governance ("ESG") risks, and quantitative information on climate-change-related risks, including transition and physical risks and mitigating actions, in accordance with Article 449a CRR.

Disclosure of this information by large institutions would begin as of the 31 December 2022 disclosure reference date. Although the Company is not a large institution, the CBI does expect less significant institutions to apply the expectations in the European Central Bank's ("ECB") Guide on Climate-Related and Environmental Risk in a proportionate manner and these changes to the ITS will also be taken into account during development of the Company's disclosures for 2022 and future years.

Future revisions to CRR

The next revision to the CRR (CRD 6 / CRR 3), implementing the final Basel reforms (Basel IV), is expected to be implemented no earlier than 1 January 2025. The key changes for the Company are:

- *Credit Risk:* Revision to the standardised approach for credit risk to increase risk sensitivity in relation to several key aspects such as off-balance sheet commitments.
- *Operational Risk:* All existing approaches for the calculation of the own funds requirements for operational risk are replaced by a single non-model-based approach to be used by all institutions, which combines an indicator based on an institution's business size with an indicator based on loss history.
- *Market Risk*: Introduced initially as a reporting-only requirement in 2021, the legislative changes that will require banks to meet their capital requirements under the new FRTB rules will be included in CRR3.

2 Capital Adequacy

2.1 Capital Management (Article 438(a),(c))

The Company has complied with all externally imposed capital requirements throughout the period. There have been no material changes in the Company's management of capital during the year.

The Company recognises the need to maintain a balance between the higher returns that might be possible with greater gearing and the advantages and security afforded by a sound capital position. This is achieved through the Internal Capital Adequacy Assessment Process ("ICAAP").

The overarching principle of the ICAAP is the explicit linkage between capital and risk; the adequacy of the Company's capital is assessed on the basis of the risks to which it is exposed. This requires a clear assessment of the material risk profile of the Company and a consideration of the extent to which identified risks, both individually and in aggregate, require capital to support them. Banking operations are categorised as either trading book or banking book which informs the capital to be held against the products. In addition, the level of capital held by the Company is influenced by minimum regulatory requirements.

The Company uses two measures for determining capital requirements in the decision-making process: Minimum regulatory capital requirements (Pillar 1), and Internal capital requirement (Pillar 2) which is subject to the CBI's Supervisory Review and Evaluation Process ("SREP"). In addition, Pillar 2 Guidance ("P2G") is applied to the Company by the CBI. P2G is a supervisory tool used to set capital expectations at a level above that of overall capital requirements and is based on the SREP process. It is an assessment of the adequacy of an institution's own funds in stressed conditions. While not an own funds requirement, failure to meet P2G could result in institution-specific supervisory measures.

2.2 Minimum Regulatory Capital Requirement (Pillar 1)

As regards regulatory capital requirements and capital adequacy, the Company is subject to the requirements of the CBI, EBA and the provisions under CRD IV/CRR. The Company's capital adequacy is assessed by comparing available regulatory capital resources with capital requirements expressed as a percentage of risk weighted assets or equivalent. The regulatory minimum ratios (Pillar 1) are as follows: CET 1 of 4.5%, Tier 1 Capital of 6% and a Total Capital ratio of 8%. In addition, the Company is required to maintain a Capital Conservation Buffer comprising CET 1 eligible instruments of 2.5% of risk weighted assets and also an institution-specific Countercyclical Buffer ("CCyB") of CET 1 calculated as risk weighted assets multiplied by a weighted average of CCyB rates determined by the geographic distribution of the Company's exposures. As at October 2021 the CCyB stood at 0.02%, equivalent to US$ 0.72mm (October 2021: 0.01% equivalent to US$ 0.27mm). Refer to templates EU CCyB1 and EU CCyB2 on the next two pages for the detailed calculation of the CCyB.

Credit risk

The Company uses the Standardised Approach for calculating capital requirements for credit risk. This approach involves the application of risk weights to the Company's assets based on the deemed creditworthiness of its debtors and the rules as laid out in the CRR. More detail is provided in the credit risk section.

The Company calculates counterparty credit risk (CCR) for Derivatives (using the Standardised Approach - SA-CCR) and SFTs (using the Supervisory Volatility Adjustments Approach for master netting agreements). In addition, banks are required to hold capital against the risk that the credit quality of the counterparties could deteriorate. A Credit Valuation Adjustment (CVA) capital charge is required to cover this risk.

Market risk

The Company applies the Standardised Approach for the calculation of market risk regulatory capital.

Operational risk

The capital requirement for operational risk is calculated according to the Basic Indicator Approach. This requires the Company to hold a capital amount equal to 15% of the average of the sum of net interest income and net non-interest income for the three preceding 12-month financial periods for which audited financial information is available.

2.3 Internal Capital Adequacy Assessment Process (Pillar 2)

The Company defines its internal capital requirement as the capital required to protect it against severe unexpected losses that might put the solvency of the Company at risk. CRD requires banks to undertake the ICAAP which is then subject to periodic supervisory review under the SREP process to determine if additional Pillar 2 capital is required for any material risk. In addition to Pillar 1 capital the Company holds Pillar 2 capital, as considered necessary, for those additional risks not captured in the Pillar 1 computation. The risks identified through the ICAAP process as requiring additional capital are credit concentration risk, interest rate risk in the banking book, credit spread volatility risk, pension risk and operational risk. As at 31 October 2021 the Company was required to maintain a Pillar 2 capital requirement of 6.9% of RWA (2020: 4.03%). As at 31 October 2021, in terms of the Total Capital ratio the Company has an Overall Capital Requirement ("OCR") of 17.42%. This comprises the above Pillar 1 requirement of 8%, capital buffers totalling 2.52% and the Pillar 2 requirement of 6.9%.

Table 5 – EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (Article 440(1)(a))

31 Oct 2021	General Credit Exposures		Relevant Credit Exposures – Market Risk		Securitisation Exposures		Own Funds requirements						
US$'000	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book	Value of trading book exposures for internal models	Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
Breakdown by country:													
Belgium	27,984	-	-	-	-	27,984	2,239	-	-	2,239	27,984	1.03%	-
Finland	20,379	-	-	-	-	20,379	1,630	-	-	1,630	20,379	0.75%	-
France	377,671	-	-	-	-	377,671	21,464	-	-	21,464	268,297	9.89%	-
Germany	481,766	-	-	-	-	481,766	32,897	-	-	32,897	411,221	15.16%	-
Ireland	83,453	-	-	-	-	83,453	6,676	-	-	6,676	83,450	3.08%	-
Luxembourg	54,089	-	-	-	310,164	364,253	4,327	-	4,963	9,290	116,122	4.28%	0.50%
Netherlands	328,236	-	-	-	-	328,236	26,259	-	-	26,259	328,236	12.10%	-
Norway	53,207	-	-	-	-	53,207	426	-	-	426	5,323	0.20%	1.00%
Spain	209,396	-	-	-	-	209,396	16,752	-	-	16,752	209,396	7.72%	-
Sweden	23,290	-	-	-	-	23,290	1,863	-	-	1,863	23,290	0.86%	-
Switzerland	107,909	-	-	-	-	107,909	8,633	-	-	8,633	107,909	3.98%	-
United Kingdom	36,020	-	-	-	-	36,020	2,882	-	-	2,882	36,020	1.33%	-
United States	152,837	-	-	-	46,517	199,354	8,972	-	46,517	55,489	693,611	25.58%	-
Bahamas	8,281	-	-	-	-	8,281	663	-	-	663	8,281	0.31%	-
Bermuda	110,319	-	-	-	-	110,319	9,474	-	-	9,474	118,427	4.37%	-
Canada	1,017	-	-	-	-	1,017	81	-	-	81	1,017	0.04%	-
Cayman Islands	126,637	-	-	-	-	126,637	10,196	-	-	10,196	127,455	4.70%	-
Jersey	114,109	-	-	-	-	114,109	9,129	-	-	9,129	114,109	4.21%	-
Marshall Islands	11,110	-	-	-	-	11,110	889	-	-	889	11,110	0.41%	-
South Africa	5	-	-	-	-	5	-	-	-	-	5	-	-
Total	**2,327,715**	**-**	**-**	**-**	**356,681**	**2,684,396**	**165,452**	**-**	**51,480**	**216,932**	**2,711,642**	**100.00%**	

The slight absolute increase in the CCyB was due to the 0.25% increase implemented by Luxembourg during the year along with an increase in the RW applied to a securitisation position issued in that jurisdiction.

31 Oct 2020	General Credit Exposures		Relevant Credit Exposures – Market Risk		Securitisation Exposures		Own Funds requirements						
US$'000	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book	Value of trading book exposures for internal models	Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
Breakdown by country:													
Belgium	37,070	-	-	-	-	37,070	2,446	-	-	2,446	30,575	1.00%	-
Finland	40,943	-	-	-	-	40,943	1,638	-	-	1,638	20,475	0.67%	-
France	536,002	-	-	-	-	536,002	18,096	-	-	18,096	226,200	7.38%	-
Germany	503,368	-	-	-	-	503,368	24,475	-	-	24,475	305,938	9.98%	-
Ireland	99,795	-	-	-	-	99,795	7,979	-	-	7,979	99,738	3.25%	-
Luxembourg	87,695	-	-	-	291,821	379,516	4,213	-	2,335	6,548	81,850	2.67%	0.25%
Netherlands	384,545	-	-	-	-	384,545	22,626	-	-	22,626	282,825	9.22%	-
Norway	28,764	-	-	-	-	28,764	230	-	-	230	2,875	0.09%	1.00%
Spain	283,724	-	-	-	-	283,724	11,064	-	-	11,064	138,300	4.51%	-
Sweden	46,792	-	-	-	-	46,792	1,872	-	-	1,872	23,400	0.76%	-
Switzerland	100,269	-	-	-	-	100,269	4,011	-	-	4,011	50,138	1.63%	-
United Kingdom	503,320	-	-	-	-	503,320	27,783	-	-	27,783	347,288	11.32%	-
United States	753,616	-	-	-	46,554	800,170	39,636	-	46,554	86,190	1,077,375	35.13%	-
Bahamas	8,300	-	-	-	-	8,300	664	-	-	664	8,300	0.27%	-
Bermuda	93,941	-	-	-	-	93,941	7,934	-	-	7,934	99,175	3.23%	-
Canada	945	-	-	-	-	945	76	-	-	76	950	0.03%	-
Cayman Islands	200,070	-	-	-	-	200,070	12,385	-	-	12,385	154,813	5.05%	-
Jersey	112,846	-	-	-	-	112,846	8,596	-	-	8,596	107,450	3.50%	-
Marshall Islands	18,540	-	-	-	-	18,540	741	-	-	741	9,263	0.30%	-
Total	**3,840,545**	**-**	**-**	**-**	**338,375**	**4,178,920**	**196,465**	**-**	**48,889**	**245,354**	**3,066,928**	**100.00%**	

Table 6 – EU CCyB2 - Amount of institution-specific countercyclical capital buffer (Article 440(1)(b))

US$'000	**31 Oct 2021**	**31 Oct 2020**
Total risk exposure amount	3,089,798	3,512,964
Institution specific countercyclical capital buffer rate	0.02%	0.01%
Institution specific countercyclical capital buffer requirement	723	267

Overview of total risk exposure amounts

The table below provides an overview of the total risk exposure amounts (TREA) forming the denominator of capital ratio calculation in accordance with Article 92 of the CRR. TREA is reported as at 31 October 2021 and comparable along with total own funds requirements for 31 October 2021 (8% of TREA).

Table 7 – EU OV1 – Overview of total risk exposure amounts (Article 438(d))

		Total risk exposure amounts (TREA)		Total own funds requirements
US$'000		**31 Oct 2021**	**31 Oct 2020**	**31 Oct 2021**
1	Credit risk (excluding CCR)	2,209,826	2,594,722	176,786
2	Of which the standardised approach	2,209,826	2,594,722	176,786
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU 4a	Of which equities under the simple risk weighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk - CCR	30,305	8,458	2,424
7	Of which the standardised approach	18,756	-	1,500
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	211	-	17
EU 8b	Of which credit valuation adjustment - CVA	11,337	2,639	907
9	Of which other CCR	1	5,819	-
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	643,493	611,109	51,479
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	62,033	29,182	4,963
19	Of which SEC-SA approach	581,460	581,930	46,517
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	15,935	65,519	1,275
21	Of which the standardised approach	15,935	65,519	1,275
22	Of which IMA	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	190,239	233,156	15,219
EU 23a	Of which basic indicator approach	190,239	233,156	15,219
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)	2,347	450	188
29	**Total**	**3,089,798**	**3,512,964**	**274,184**

Note that row 24 is a memo item on template OV1 and is not included in the totals on row 29

The main driver of the reduction in RWA was a reduction in credit risk, due to reduced corporate loan asset, offset to a degree by an increase in undrawn commitments. Other factors include reductions in operational risk (due to reduced average operational income under the basic indicator approach) and a decrease in market risk (FX risk).

The following table provides a summary of the Company's main prudential and regulatory information and ratios, including Pillar 2 requirements, covered by the CRR

Table 8 – EU KM1 - Key metrics template (Article 447)

US$'000		31 Oct 2021	31 Oct 2020
	Available own funds (amounts)		
1	Common Equity Tier 1 (CET1) capital	1,724,790	1,684,000
2	Tier 1 capital	1,724,790	1,684,000
3	Total capital	1,764,790	1,724,000
	Risk-weighted exposure amounts		
4	Total risk exposure amount	3,089,798	3,512,964
	Capital ratios (as a percentage of risk-weighted exposure amount)		
5	Common Equity Tier 1 ratio (%)	55.82%	47.94%
6	Tier 1 ratio (%)	55.82%	47.94%
7	Total capital ratio (%)	57.12%	49.08%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)		
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	6.90%	4.03%
EU 7b	of which: to be made up of CET1 capital (percentage points)	5.61%	4.03%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	5.61%	4.03%
EU 7d	Total SREP own funds requirements (%)	14.90%	12.03%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)		
8	Capital conservation buffer (%)	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-
9	Institution specific countercyclical capital buffer (%)	0.02%	0.01%
EU 9a	Systemic risk buffer (%)	-	-
10	Global Systemically Important Institution buffer (%)	-	-
EU 10a	Other Systemically Important Institution buffer (%)	-	-
11	Combined buffer requirement (%)	2.52%	2.51%
EU 11a	Overall capital requirements (%)	17.42%	14.54%
12	CET1 available after meeting the total SREP own funds requirements (%)	40.92%	37.05%
	Leverage ratio		
13	Total exposure measure	4,983,308	5,191,925
14	Leverage ratio (%)	34.61%	32.43%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)		
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU 14b	of which: to be made up of CET1 capital (percentage points)	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	N/A
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)		
EU 14d	Leverage ratio buffer requirement (%)	-	N/A
EU 14e	Overall leverage ratio requirement (%)	3.00%	N/A
	Liquidity Coverage Ratio		
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	1,759,116	1,942,285
EU 16a	Cash outflows - Total weighted value	1,029,415	776,996
EU 16b	Cash inflows - Total weighted value	459,166	204,516
EU 16	Total net cash outflows (adjusted value)	595,010	594,701
17	Liquidity coverage ratio (%)	304.79%	340.15%
	Net Stable Funding Ratio		
18	Total available stable funding	1,726,535	2,180,507
19	Total required stable funding	1,135,237	1,722,359
20	NSFR ratio (%)	155.28%	126.60%

The 2020 NSFR was calculated following the approach outlined in the Basel Committee on Banking Supervision's document (Basel III: The Net Stable Funding Ratio October 2014)

2.4 Leverage Ratio

The leverage ratio is a supplementary non-risk based capital measure to constrain the build-up of leverage (i.e. create a backstop on the degree to which a banking firm can leverage its capital base). It is calculated as a percentage of Tier 1 capital versus the total on and off balance sheet exposure (not risk weighted).

The following tables analyse the leverage ratio exposures of the Company for the year end 31 October 2021 and comparable in accordance with Articles 429 and 499 of the CRR.

Table 9 – EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures (Article 451(1)(b))

US$'000		31 Oct 2021	31 Oct 2020
1	**Total assets as per published financial statements**	**3,532,447**	**4,174,205**
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 recognised 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	Adjustment for derivative financial instruments	20,442	(1,321)
9	Adjustment for securities financing transactions (SFTs)	146	-
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	1,427,192	1,022,976
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	(1,703)	(1,723)
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	4,784	(2,212)
13	**Total exposure measure**	**4,983,308**	**5,191,925**

Note that in the Derivatives Exposures section below, comparatives as at 31 October 2020 are not provided on the same basis as SA-CCR only became effective 28 June 2021 and replacement cost and potential future exposure amounts were calculated using the previous mark to market method.

Table 10 – EU LR2 - LRCom: Leverage ratio common disclosure (Article 451(1)(a) & (b))

US$'000		31 Oct 2021	31 Oct 2020
	On-balance sheet exposures (excluding derivatives and SFTs)		
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	3,507,833	4,159,198
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)	-	-
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)	(1,745)	(2,002)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**3,506,088**	4,157,196
	Derivative exposures		
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	3,711	191
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-

US$'000		31 Oct 2021	31 Oct 2020
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	46,171	11,562
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)	-	-
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	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	**Total derivatives exposures**	**49,882**	11,753
	Securities financing transaction (SFT) exposures		
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	146	-
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	**Total securities financing transaction exposures**	**146**	-
	Other off-balance sheet exposures		
19	Off-balance sheet exposures at gross notional amount	2,882,782	2,095,965
20	(Adjustments for conversion to credit equivalent amounts)	(1,455,590)	(1,072,989)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	**Off-balance sheet exposures**	**1,427,192**	1,022,976
	Excluded exposures		
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)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
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)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	**(Total exempted exposures)**	**-**	-
	Capital and total exposure measure		
23	**Tier 1 capital**	**1,724,790**	1,684,000
24	**Total exposure measure**	**4,983,308**	5,191,925
	Leverage ratio		
25	Leverage ratio (%)	**34.61%**	32.43%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	**34.61%**	32.43%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	**34.61%**	32.43%
26	Regulatory minimum leverage ratio requirement (%)	**3.00%**	N/A
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	**-**	N/A
EU-26b	of which: to be made up of CET1 capital	**-**	N/A
27	Leverage ratio buffer requirement (%)	**-**	N/A
EU-27a	Overall leverage ratio requirement (%)	**3.00%**	N/A
	Choice on transitional arrangements and relevant exposures		

US$'000		31 Oct 2021	31 Oct 2020
EU-27b	Choice on transitional arrangements for the definition of the capital measure	N/A	N/A
	Disclosure of mean values		
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	N/A	N/A
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	N/A	N/A
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)	N/A	N/A
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)	N/A	N/A
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)	N/A	N/A
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)	N/A	N/A

Table 11 – EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) (Article 451(1)(b))

		CRR leverage ratio exposures	
US$'000		**31 Oct 2021**	**31 Oct 2020**
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	**3,502,857**	4,159,201
EU-2	Trading book exposures	-	-
EU-3	Banking book exposures, of which:	3,502,857	4,159,201
EU-4	Covered bonds	105,267	28,764
EU-5	Exposures treated as sovereigns	1,850,779	1,629,420
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	176,463	302,174
EU-7	Institutions	220,907	148,010
EU-8	Secured by mortgages of immovable properties	-	-
EU-9	Retail exposures	-	-
EU-10	Corporates	768,947	1,671,519
EU-11	Exposures in default	16,217	18,299
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	364,277	361,015

The leverage ratio increased by 1.3% to 33.7% at 31 October 2021 (see template EU LR2 above). Tier 1 capital decreased slightly by US$ 3mm as noted above while the leverage exposure measure decreased by US$ 209 mm (↓ 4%). The main driver of the decrease in the exposure measure was the above noted reduction in corporate loan assets, partially offset by off-balance sheet commitments.

The Company manages the risk of excessive leverage through the use of a risk appetite metric which is presented to the Asset, Liability and Market Risk Committee ("ALCO") on a monthly basis and outlined in table 12 in section 3.2 below.

3 Risk Management

Introduction

The Company's financial risk management objective is the prudent management of risk within the parameters of the risk appetite articulated by the Board of Directors ("the Board"), ensuring an appropriate balance between risk and reward in order to maximise shareholder returns in alignment with the Company's overall business strategy. The Company has implemented a risk management framework, which is modelled significantly on that of Scotiabank and is captured in a Board approved document of that name. The framework includes five components namely Risk Governance, Risk Appetite, Risk Management Tools, Risk Identification and Assessment and Risk Culture. The Framework document is the key source of information for the Board, Senior Management, and all other employees of the Company that:

- Outlines the risk governance, risk management principles, risk appetite, risk culture, risk management tools and other key elements of its risk management framework;
- Describes how SIDAC identifies, measures, manages and controls and reports on the risks to which the entity is exposed;
- Serves as an over-arching framework for all elements of risk management activities, and a source document to which all other risk management frameworks and policies must be aligned.

This Framework is subject to regular evaluation to ensure that it meets the challenges and requirements of the global markets in which SIDAC operates, including regulatory standards and industry best practices as well as standards set by BNS.

The Company has put in place a disciplined and constructive control environment in which all employees understand their roles and obligations. The application of the control environment is through training, management standards and procedures. In the view of the Board the Risk Management Framework is appropriate to the size and scale of operations of the Company and is effective in controlling these operations within the expressed risk appetite.

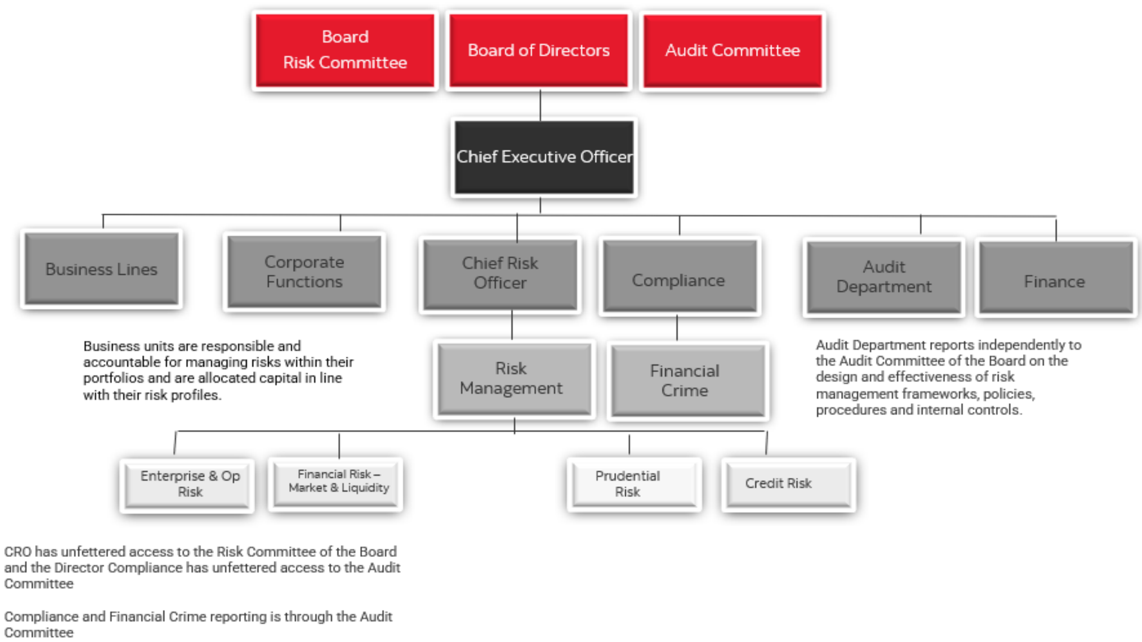
3.1 Risk Governance

The main elements of the Company's risk governance model include:

- The Board of Directors
- Board Committees
- Senior Management

SIDAC's risk management framework is predicated on the three-lines-of-defence model. Within this model, the First Line of Defence incur and own the risks (1A, supported by 1B/Internal Control) while the Second Line of Defence (comprised of control functions such as Risk Management, Compliance and Finance[1]) provide independent oversight and objective challenge to the First Line of Defence, as well as monitoring and control of risk. The Internal Audit Department (the 3LOD) provides enterprise-wide independent assurance over the design and operation of SIDAC's internal control, risk management and governance processes throughout the first and second lines of defence. Employees in every area of the organization are responsible for risk management.

Risk Management Governance Structure



[1] *Finance conducts both first and second line of defence activities within SIDAC*

3.1.1 The Board of Directors

The Board of Directors, as the top of SIDAC's risk management governance structure, provides oversight, either directly or through its committees, to satisfy itself that decision making is aligned with the Company's strategies and risk appetite.

The Board's membership is composed of highly qualified directors from diverse backgrounds, who have familiarity with the financial services industry in the European Union and in Ireland in particular, and who reflect the required expertise and skill sets appropriate for Directors supervising the management of the business and affairs of the Company. They demonstrate sound and independent business judgement, based on the criteria detailed below.

The Board reviews and approves policies designed to help mitigate the risks faced by the business and sets limits to control the level of exposure to these risks. Policies are reviewed regularly to reflect changes in market conditions, regulatory requirements, business activities or product mix.

The Board of Directors has the ultimate responsibility for ensuring that Senior Management establishes and maintains:

- An adequate and effective system of internal control;
- A measurement system for assessing the various risks of the Company's activities;
- A system for relating risks to the capital level; and
- Appropriate methods for monitoring compliance with laws, regulations and supervisory and internal policies.

3.1.2 Nomination and Directorship

Management Body

The Board has a broad range of expertise across a number of relevant areas including banking and capital markets, accounting, risk management, and taxation. At 31 October 2021, the Board comprised six directors made up of one Executive Director, one Non-Group Non-Executive Director, one Group Non–Executive Director and three Independent Non-Executive Directors as shown below. The Corporate Governance structure is documented in a policy paper which is approved by the Board.

Table 12 – 2021 Members of the Board of Directors

Name	Roles/Job Titles	Board Member	Member of Sub-Committee of the Board
Terry Fryett	Former Scotiabank (BNS) Executive Vice President & Chief Credit Officer	Non-Group, Non-Executive Director (Chair of the Board)	Board Risk Committee ("BRC")
Nicola Vavasour	SIDAC CEO	Executive Director	N/A
Mary Walsh*	Chartered Accountant and former international tax partner (resigned 21 January 2021)	Independent Non-Executive Director	Audit Committee ("AC"); BRC
Caroline McDonnell	Chartered Accountant and former senior tax technologist	Independent Non-Executive Director	Member of BRC and AC since 19 February 2021
Peter Heidinger	Managing Director & Head, Europe, Scotiabank	Group Non-Executive Director	BRC and AC
Joseph Dempsey	Chartered Accountant and Financial Consultant and Director within various financial services companies and banks	Independent Non-Executive Director	Chair of AC; BRC
Edward Ward	Chartered Director and former Senior Executive with Citigroup and AIB	Independent Non-Executive Director	Chair of BRC; AC

** Resigned during 2021*

Recruitment Policy for Board of Directors

Selection Criteria and Policy

The Company's policies and processes reflect the requirements of the "Joint European Securities and Markets Authority ("ESMA") and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders".

The Board as a whole must have relevant financial and risk expertise. When appropriate the Board may engage qualified independent external advisors to conduct a search for candidates who meet the Board's expertise, skills and diversity criteria.

The Board is responsible for the appointment of Independent Non-Executive Directors and, where appropriate, identifying and proposing the appointment of Independent Non-Executive Directors to shareholders. Before appointment to the Board, the proposed director must show that he/she satisfies the selection criteria applicable to the role for which the individual is being proposed for appointment, evidencing items such as their skills, experience, expertise, competencies, professionalism, fitness, probity and integrity to carry out his or her duties, including a knowledge and appreciation of public issues and familiarity with local, national and international affairs.

Diversity

The Company's Board is composed of highly qualified directors from diverse backgrounds, who have familiarity with the financial industry in the European Union and Ireland in particular.

To support this composition as part of the Board's commitment to sound and effective corporate governance practices, the Board will, when identifying candidates, and bearing in mind the desire for a diverse Board and diversity criteria, including gender, age, ethnicity and geographic background, recommend for appointment to the Board only those candidates who:

- have the relevant skills, experience, expertise, knowledge, appropriate qualification for the role and perspectives to provide an independent challenge; and,
- have the necessary personal qualities, professionalism and integrity expected of a Board member.

As part of its commitment to board diversity, the Company is a member of the 30% Club Ireland. The Board's Diversity Policy states that it aspires to have each gender comprise at least 30% of the Board. For 2021, based on the periods served on the Board, 32% of serving directors were women. This included a transitional period as a Board member's service period came to an end but was above the 30% target included in the Board's Diversity Policy. SIDAC is committed to having a diverse board, to achieving the aspirations set in this regard and to ensuring an open and fair recruitment process. As part of the process underpinning the Board's annual confirmation of compliance with the CBI Corporate Governance Requirements (2015), the Board undertakes an annual review of its Board Diversity Policy's effectiveness in its review of Board effectiveness.

Table 13 – Directors knowledge, skills and expertise

Name	Knowledge, skills and expertise
Terry Fryett	Mr. Fryett is Chairman of the Board of Directors. He has over 40 years' experience at Scotiabank where he has held various senior roles including CEO of Scotiabank Europe plc in the UK and Senior Vice President and CFO, Scotia Capital (now GBM) in Canada. Mr. Fryett was Executive Vice President & Chief Credit Officer at the time of his retirement from Scotiabank in 2019.Currently, Mr. Fryett also acts as Board Chairman of Tangerine Bank which is also part of the Scotiabank Group.
Nicola Vavasour	Ms. Vavasour is SIDAC's CEO. Previously, Ms. Vavasour was Scotiabank's Chief Risk Officer, Asia Pacific where she was responsible for the overall efficient and effective management, monitoring and reporting of all risks across Scotiabank's Asia Pacific operations. Prior to this Ms. Vavasour was responsible for developing Scotiabank's global Liquidity Risk Framework in Toronto.
Mary Walsh*	Ms Walsh, a chartered accountant, is a former international tax partner with over 25 years' experience at PwC and wide-ranging experience as a Non-Executive Director. Previously, she was a member of the Commission on Taxation and has also held Directorships with the National Treasury Management Agency and Central Bank of Ireland. Mary Walsh stood down from the Board of Directors on 22 January 2021.
Peter Heidinger	Mr. Heidinger is responsible for the regional management of Scotiabank's wholesale banking operations in Europe and is CEO of Scotiabank's European subsidiary, Scotiabank Europe plc. These operations include corporate and investment banking and global markets sales and trading. Most recently, he led Scotiabank's wholesale operations in Asia and Australia. Prior to joining Scotiabank in 2015, he held global and regional coverage, credit and product roles at both U.S. and European banks. Over his career, he has been based in North America, Europe and Asia.
Joseph Dempsey	Mr. Dempsey, a chartered accountant and chartered director, is currently a Non-Executive Director of Depfa Bank plc and Guggenheim Partners Europe Limited. He has extensive experience in financial services and previously acted as General Manager of Deutsche Bank Ireland plc and as a financial consultant to a number of entities in the leveraged credit fund management and property sectors.
Caroline McDonnell	Ms McDonnell, a chartered accountant and senior tax technologist. is an expert in areas of analytics and robotic technologies. Ms McDonnell is currently a Non-Executive Director of AXA Insurance DAC, ECCU Assurance DAC and MGP McGill and Partners Ireland Limited. She has extensive experience in financial accounting having previously worked in that area for 18+ years.
Edward Ward	Mr. Ward has extensive experience in international and domestic banking. He retired from AIB in 2019 where he held various senior executive positions since 2007, including Divisional Chief Credit Officer. Prior to joining AIB, he held senior executive positions in

Name	Knowledge, skills and expertise
	corporate banking and risk management with Citigroup over a period of 22 years, mainly overseas, having started his banking career with The Investment Bank of Ireland. He is a Qualified Financial Advisor and Fellow of the Institute of Banking and a Chartered Director of the UK Institute of Directors. He is also a Non-executive Director of IQ EQ Fund Management (Ireland) Limited and The Central Remedial Clinic.

**Resigned during 2021*

Directorship

Appointments must not proceed where possible conflicts of interest may emerge which are significant to the overall work of the Board. The following Directorships are held by current members of the Board including their SIDAC Directorship.

Table 14 – Directorships

Name	Total No. of directorships	Of which are held within the Scotiabank Group	Of which are Executive Directorships
Terry Fryett	2	2	-
Nicola Vavasour	1	1	1
Caroline McDonnell	4	1	-
Peter Heidinger	4	2	2
Joseph Dempsey	5	1	-
Edward Ward	3	1	-

3.1.3 Board Committees

The Board Risk Committee (“BRC”) assists the Board in fulfilling its responsibilities for identifying and monitoring key financial and non-financial risks and the oversight of the promotion and maintenance of a strong risk culture throughout SIDAC. Responsibilities include:

- Understanding the risks run by the Company which are typically inherent in banking activities;
- Overseeing that these risks are appropriately and effectively managed;
- Setting and monitoring risk appetite metrics; and
- Ensuring the adequacy of the Company’s capital in relation to the risks inherent in the operations as a whole.

The Audit Committee (“AC”) assists the Board in:

- Fulfilling its supervision and monitoring duties regarding effectiveness of internal controls, including internal control over financial reporting.
- Providing oversight and monitoring of the Internal Audit function and the External Auditor and in particular in relation to their effectiveness, objectivity and independence.
- Approving the Company’s financial statements and Pillar 3 disclosures.
- Monitoring compliance with the Company’s risk management controls and procedures.
- Providing oversight of the Compliance and the Financial Crimes Risk Management (including Anti-Money Laundering/Anti-Terrorist Finance (AML/ATF) Sanctions and Fraud functions). This Committee also assists the Board in fulfilling its oversight responsibilities for setting standards of conduct and ethical behaviour, and the oversight of conduct risk.

The Board and its Committees meet at least quarterly and review detailed information provided on all areas of the Company’s operation, including, but not limited to, all of the risk areas set out above. The BRC met 9 times in fiscal 2021. The Chairpersons of the AC and BRC report to the Board on the topics discussed by the Committees and submit recommendations to the Board for final decision-making.

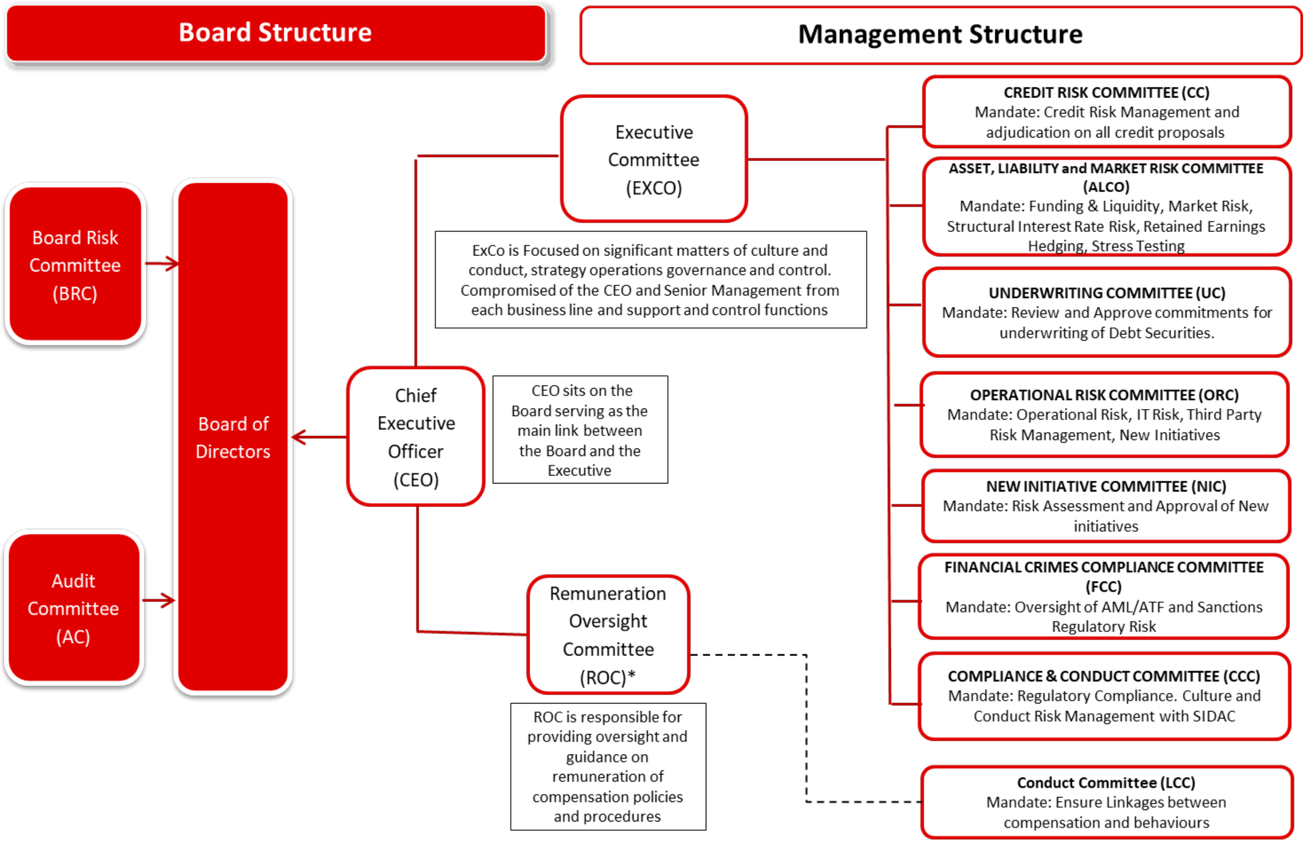
3.1.4 Senior Management

The Board, together with its AC and BRC, sits at the head of the Company risk management structure. The Senior Management team, acting through the management committees, is responsible for risk management under the direct oversight of the CEO. The committees are supported by the Risk Management, Compliance and Internal Audit functions as well as an Advice and Counsel process involving Scotiabank technical groups, which includes Global Risk Management (“GRM”). The internal governance and management committee structure enables more focused discussions by the appropriate committee members and decisions makers and consists of:

- Executive Committee ("ExCo") an overarching committee which focuses on significant matters of strategy, operations, governance etc.
- ALCO, providing oversight of balance sheet management including liquidity, funding and contingency funding, interest rate risk, market risk, concentration risk, capital management and recovery planning. The ALCO is the Company's governance forum with respect to the oversight of a Recovery or Liquidity crisis, once a significant stress has emerged.
- Credit Committee ("CC"), responsible for overseeing credit risk management including (non-exhaustive) adjudication on credit proposals, review and recommendation of credit risk limits, review of performance of the credit portfolio on a regular basis, approval of all credit risk provisions and write-offs.
- Underwriting Committee ("UC") which reviews and approves commitments for underwriting of debt securities for Capital Markets and approves hedging strategies to mitigate risk associated with underwriting activities.
- Operational Risk Committee ("ORC") responsible for providing oversight of Operational Risk including Third Party Risk Management, IT Risk/Cyber Security, Data Risk, Environmental/Climate Risk and Model Risk Management.
- Compliance and Conduct Committee ("CCC") responsible for (non-exhaustive): Regulatory compliance, Taxation, Conduct and culture (promoting strong ethical behaviours and conduct within SIDAC).
- New Initiative Committee ("NIC") responsible for evaluating the risk assessments conducted on proposed new initiatives (including new products), ensuring compliance with regulatory requirements and for putting in place appropriate controls before the commencement of any such initiatives, ultimately acting as the management approval authority for new initiatives in SIDAC.
- Financial Crime Compliance Committee ("FCCC") responsible for providing oversight of AML/ATF and Sanctions activities in SIDAC and reviewing related current and emerging regulatory risks or trends.
- Remuneration Oversight Committee ("ROC"). The remuneration oversight role, which is supported by a sub-committee: Local Conduct Committee, is responsible for ensuring compliance with all applicable Irish and European remuneration-related regulatory requirements and overseeing the implementation of new policies and procedures to support the requirements

3.1.5 **Governance Structure**

The diagram on the following page sets out the governance structure and provides more detail on the roles of each committee. This structure was designed so that ultimate responsibility for implementing and maintaining the structure and for reviewing its effectiveness lies with the Board of Directors.



The CEO is supported in the governance of SIDAC by the Management Committees and in particular the ExCo as outlined above and sits on the Board serving as the main link between the Board and the executive.

ROC is responsible for providing oversight and guidance to management and the Board on HR remuneration matters and to oversee implementation of compensation policies and procedures. The Local Conduct Committee ensures there is an appropriate linkage between compensation and behaviours.

* The Head of HR, as appropriate, may present directly to the Board of Directors without the CEO present.

3.2 Risk Appetite

A clearly articulated risk appetite and statement of how the risk profile of an organisation will be managed within such an appetite is crucial for an effective risk management framework. The Company has a clearly defined Risk Appetite Framework which consists of the identification of:

Risk capacity: The maximum level of risk SIDAC can assume before breaching key constraints;

Risk appetite: The level and types of risk SIDAC is willing to assume within its risk capacity to achieve its strategic objectives, and

Key risk appetite measures: Quantitative metrics that capture SIDAC's risk appetite, as per table 15 below.

Together, the application of these components helps to ensure SIDAC stays within appropriate risk boundaries.

Table 15 – Risk Appetite Metrics

Risk Category	Metric Description
Enterprise Risk	Total Capital Ratio
	Leverage Ratio
	CET1 Ratio FX Sensitivity
	Return on Equity
Strategic Risk	YTD % Deviation from Planned Income
	Maximum exposure to Corporate Clients (US$ mm)

Credit Risk – Corporate	Maximum exposure by Borrower/Connection (US$ mm)
	Maximum exposure by Corporate Borrower/Connection -Non-USD (US$ mm)
Credit Risk Issuer	Maximum Exposure to Non-Investment Grade credit exposures
	Minimum Credit Quality at Extension (Borrower and Facility)
Credit Risk – All Portfolios	Maximum Securities Exposure (US$ mm)
	Minimum Credit Quality of debt investments at Purchase
	Maximum Single name counterparty/connection exposure (US$ mm)
	Maximum Credit Loss (Fiscal Year) (US$ mm)
Liquidity Risk	Liquidity Coverage Ratio (LCR)
	Net Stable Funding Ratio (NSFR)
	Min. Intraday Liquidity Risk coverage under stress (US$ mm)
	% of FX Funding of Balance Sheet
Market Risk	Net Interest Income (NII) (US$ mm)
	Economic Value of Equity (EVE (US$ mm)
	Credit Spread Volatility Risk CS01 (US$ mm)
	Maximum Value at Risk (VaR) for all trading portfolios (C$ mm)
	Maximum Stressed VaR (sVaR) for all trading portfolios (C$ mm)
	Stress Test: Trading Portfolio worst case (C$ mm)
Concentration Risk*	# of Unauthorised Material Concentrations
Conduct Risk	Qualitative Assessment of Conduct Risk
Compliance Risk	# of F3 Regulatory Findings/Internal Issues
	# of F4 Regulatory Findings/Internal Issues
Reputational Risk	# of Negative Impacts to Scotiabank Brand
Environmental Risk	Environmental Performance Metric
Operational Risk	Total Financial Impact (US$ mm)
	Total Annual Loss (US$ mm)
	# of High Severity Operational Risk Events
	Audit Issue Clearance
	# of Material Outsourcing Issues
Cyber Security & IT	# of Hours of Systems Downtime (Hours)
	Enterprise Security Risk Index (SRI - Protect)
	Enterprise Security Risk Index (SRI – Identify)
	Enterprise Security Risk Index (SRI – Respond & Recover)

** The term 'unauthorised' distinguishes this concentration from known and accepted concentrations (such as funding from BNS).*

3.3 Risk Management Tools

Effective risk management includes tools that are guided by the Risk Appetite Framework and integrated with the Company's strategies and business planning processes. The Risk Management Framework is supported by the below risk management tools that are used together to manage risks and are regularly reviewed and updated to ensure consistency with risk-taking activities, and relevance to the business and financial strategies of the Company.

Policies, Frameworks and Limits

Activities are guided by the principles and processes established in various policies which are approved by the Board and/or appropriate management committees. SIDAC develops and implements its key risk policies in consultation with GRM or other BNS departments who provide advice and counsel as applicable. Such policies and frameworks are designed to reflect the regulatory requirements and guidelines of the CBI and the EBA and other locally applicable legislation or regulations.

Limits govern and control risk-taking activities within the appetite and tolerances established by the Board and Senior Management. They are set to ensure risk taking activities are in line with the strategic objectives, risk culture and risk appetite of SIDAC. Limits also establish accountability for key tasks in the risk-taking process and establish the level or conditions under which transactions may be approved or executed.

Risk Measurement, Monitoring & Reporting

SIDAC measures and monitors its risk exposures to ensure business activities are operating within approved limits or guidelines, strategies and risk appetite. Breaches, if any, of these limits or guidelines are reported to Senior Management and/or the AC depending on the limit or guideline, and for information to BNS GRM.

Management utilise various risk techniques such as models, stress testing, scenario and sensitivity analysis and back testing using data with forward-looking projections based on plausible and worst case economic and financial market events to support its risk measurement activities.

Risk reports aggregate measures of risk across products and businesses, and are used to ensure compliance with risk policies, limits and guidelines. They also provide a clear statement of the amounts, types, and sensitivities of the various risks in the portfolio. Senior Management and the Board use this information to understand the risk profile and the performance of the portfolios. A comprehensive summary of SIDAC's risk profile and performance is presented quarterly by the CRO to the BRC.

Stress Testing

Stress testing programmes at both the enterprise-wide level and individual risk level allow SIDAC to estimate the potential impact or strain on income and capital as a result of significant changes in market conditions, credit environment, liquidity demands or other risk factors that may arise as a result of Bank-specific, systemic, and combination stress scenarios. Stress testing is also integrated into both the strategic and financial planning processes as well as financial crisis management planning to proactively identify emerging risks and potential vulnerabilities across a number of stress scenarios with differing severities and time horizons. The development, approval and on-going review of stress testing programs are subject to policy, and the oversight of the ALCO. Where appropriate, the Board of Directors or the BRC approves stress testing limits for certain risk factors and receives reports on performance regularly.

3.4 Risk Identification and Assessment

SIDAC has established a Risk Register programme as its primary risk identification and assessment tool, which ensures a comprehensive identification of risks across the organisation and appropriate mapping and evaluation of related controls and employing a "best practice" approach to risk identification.

The Risk Register is an entity-wide exercise to identify the risks to which SIDAC is exposed, which is both "bottom-up" and "top-down". For the purpose of the exercise, SIDAC is divided into "assessment units" covering all business lines, support and control functions. A "risk champion" is identified for each assessment unit and this individual has primary responsibility for completing the risk register for that area, with guidance provided by 2LOD. The risk champion is provided with the risk inventory and assesses the inherent risk for each risk category based on the impact and probability scales provided. Controls to mitigate these risks are identified and assessed for effectiveness and the residual risk level is then determined.

The risks identified as high inherent risks in the Risk Register process after completion of both the "bottom-up" and "top-down" exercises are regarded as the principal risks of the entity.

The Risk Register is refreshed periodically, minimum annually, and the results are presented to the BRC in the CRO Report.

The Company has identified the following risks as Principal risks:

- Credit risk
- Concentration risk
- Market risk

- Liquidity risk
- Operational risk
- Cyber Security & Information Technology risk
- Compliance risk
- Conduct risk
- Reputational risk
- Environmental risk
- Strategic risk

3.5 Risk Culture

Effective risk management requires a strong, robust, and pervasive risk culture where every employee is a risk manager and is responsible for managing risk. Risk culture is influenced by numerous factors including the interdependent relationships amongst risk governance structure, risk appetite, strategy, organisational culture, and the key components of risk management tools.

The Company's risk culture is supported through four foundational elements:

1. **Tone from the Top**: Leading by example including clear and consistent communication from SIDAC's Board, Senior Management and Scotiabank leaders on risk behaviour expectations and the importance of Scotiabank's values and fostering an environment where everyone has ownership and responsibility for "doing the right thing".
2. **Accountability**: All employees are accountable for risk management. There is an environment of open communication where employees feel safe to speak-up and raise concerns without fear of retaliation.
3. **Risk Management**: Risk taking activities are consistent with SIDAC's strategies and risk appetite. Risk appetite considerations are embedded in key decision-making processes.
4. **People Management**: Performance and compensation structures encourage desired behaviors and reinforce the risk culture.

Other elements that influence and support the risk culture:

- Code of Conduct: describes the standard of behaviour to which all employees must attest on an annual basis.
- Values: Integrity – Act with Honour; Respect – Value Every Voice; Accountability – Make It Happen; Passion – Be Your Best
- Communication: SIDAC actively communicates risk priorities, and how it relates to its staff, to promote a sound risk culture: Reputation is everything; Information is key; Success depends on you; Know your boundaries.
- Compensation: programs are structured to discourage behaviours that are not aligned with the BNS values and Scotiabank Code of Conduct, and to ensure that such behaviours are not rewarded.
- Training: risk culture is continually reinforced by providing effective and informative mandatory and non-mandatory training modules for all employees on a variety of risk management topics.
- Decision-making on risk issues follows a strict governance process: The flow of information and transactions are challenged by Management Committees and this is subsequently reviewed by the BRC, ensuring that transactions and risks are aligned with SIDAC's risk appetite.
- Senior Management Roles & Responsibilities: all senior management have risk management responsibilities within their mandates.

3.6 Statement of Internal Controls

Although the Company is not required to make a Corporate Governance Statement as it is not listed, the Board makes a statement on internal control in accordance with best practice.

The Board acknowledges its responsibility to maintain a sound system of internal control, to safeguard the shareholder's investment and the Company's assets and to set appropriate policies, controls and limits for the Company's operations. It further recognises its obligation to seek regular assurance that will enable it to satisfy itself that the system is functioning properly. The Board is assisted in its responsibilities by its BRC and AC. The BRC recommends risk management policies and limits to the Board for approval. It further oversees the management of material risks through receipt of reports from management across SIDAC's universe of material risks. The AC monitors the effectiveness of controls through reviewing and assessing reports presented by the heads of control functions as well as Internal Audit and Scotiabank Group Audit ("GA").

The Board recognises that sound risk management is essential to the Company's prudent operation. The Board charges management with developing the required control system and implementing its policies, controls and limits. This includes the process of identifying, evaluating and managing the risks faced by the Company. It receives comfort that these duties have been exercised during the year under review through the regular reporting structure and periodic discussions between Board, AC and BRC members and Senior Management.

Assessment of internal controls by the Board and its committees consists of quarterly reviews of submissions by Senior Management incorporating information on key risks, financial performance, limit usage and details of any unforeseen events. The Board is satisfied that the procedures and processes outlined above have been in operation throughout the year and may request the implementation of revisions or improvements as it deems appropriate.

The internal control system is designed to mitigate risk and cannot be seen as a method by which all risk can be eliminated. Therefore, it provides reasonable rather than absolute assurance against material loss or misstatement. The Company is subject to the CBI "Corporate Governance Requirements for Credit Institutions 2015" (the "Governance Requirements"). The Company does not have to comply with the additional obligations in Appendices 1 and 2 of the Governance Requirements for High Impact designated credit institutions.

4 Credit Risk

Credit risk is the risk of financial loss resulting from the failure of a customer to fully honour its financial or contractual obligations.

4.1 Credit Risk Management and Risk Measures

The Company's management of credit risk includes the credit risk policies, guidelines, procedures and processes that articulate the Company's credit risk governance, management and control structures. This framework ensures that credit risk exposures are adequately assessed, properly approved and actively managed in a consistent manner across all business lines. Management of the credit risk portfolios also encompasses in-house credit experience, infrastructure and a due diligence process that is closely embedded within the risk management structure. The Company's Credit Risk Management Policy sets out the processes and procedures to measure and manage credit risk. The Company has established a Credit Loss and Provisioning Policy that sets out the approach to identifying, assessing and quantifying impairments and resultant credit losses. The Company has a local Origination desk for EU 27 business, it has access to Scotiabank GRM risk management resources and the UK, US and GRM relationships are managed through a Master Service Level Agreement ("MSLA").

The Company's CC has a mandate to oversee the credit risk of the Company, assess potential new credit exposures and monitor the credit profile of the business lines, ensuring that credit risk and portfolio composition are kept within the risk appetite approved at least annually by the Board.

The Company's Credit Risk Function, ("CRF") under the direction of the CRO is the primary control function for credit risk. Each new transaction is put through a thorough credit adjudication process, which includes a review of the borrower's business model, financial performance, key risks and mitigants, including climate risk. With support from GRM, the CRF periodically reviews industry risks, country, economic and credit profiles, and portfolio concentrations. In relation to credit risk and under the Company's Three Lines-of-Defence structure the CRF is charged with 2nd line of defence responsibility for providing challenge on all transactions under the corporate loans, capital markets and treasury portfolios, in addition to oversight and monitoring responsibilities. The CRF ensures the risk appetite as set by Board and credit related processes and policies are adhered to and that problem loans are promptly identified, properly assessed and classified, and effectively followed up by the business lines. It tracks the quality of credit portfolios, monitoring for Early Warning Indicators (EWIs) and managing the reporting process, including Heightened Monitoring and Watchlist Reports, Single Name Limits and Board Reports. The CRF also reviews and assesses the appropriateness of recommendations in relation to impairment assessment and provisioning including Expected Credit

Losses; ensures that credit risk management policies and programs and risk rating systems are documented, reviewed, and updated to reflect material changes; and reviews and implements credit risk measurement and mitigation methodologies.

The primary sources of credit risk arise from direct lending operations and in funding, trading and investment activities where the counterparties have repayments or other obligations to the Company.

The Company's Corporate Lending business operates as part of a global strategy to serve priority, multi-regional clients, aligned with GBM core markets and industry focus to deliver profitable growth within a robust control environment. The Company's lending is largely in the form of syndicated or bilateral loans with investment-grade borrowers. The objective of this portfolio is to generate sustainable income accruals while maintaining a capital preservation ethos. The focus of the portfolio is on borrowers which are normally in the top tier of their industry and the Company endeavours to maintain a diversified portfolio through the credit assessment process and controls absolute levels using Board approved industry limits.

During FY21, the Company has expanded its capital markets offering to intermediate trade and investment flows between Europe and the Americas. This includes the distribution of fixed income cash securities to EEA clients, a collateral management and funding desk operating repo matched book for EEA clients and Prime Services trading activity for inventory management covering synthetic prime brokerage hedges, equity total return swaps with street counterparties and securities borrowing and lending . SIDAC's Risk Appetite was enhanced to reflect the new business, and from a credit risk perspective, this relates primarily to the introduction of a single name limit for counterparties.

The Company's Treasury function is primarily responsible for managing liquidity, funding the business lines and ensuring regulatory compliance for liquidity. The Company's liquidity portfolio consists of sovereigns/sub-sovereigns, supranational agencies, high-grade corporates and covered bonds. The main purpose is to maintain an appropriate stock of unencumbered High-Quality Liquid Assets that can be used for contingent funding purposes. The investment focus is on CRD IV/Basel III compliant bonds which are added selectively following the due diligence and assessment process once they meet the risk appetite. The Treasury Investment team also work closely with BNS Group Treasury in executing the global liquidity strategy, purchasing bonds that not only are required for regulatory liquidity management but also to complement that global strategy. Combined with the liquidity strategy the team may make other investments which have a greater emphasis on investment return than liquidity.

Credit risk is primarily controlled by means of credit limits and is monitored through Board-approved single name limits, country and industry limits. These limits are ratified by the Board at least annually. As noted above, the CRF, in consultation with Business Lines, is responsible for reviewing existing limits to ensure that they remain appropriate and consistent with the risk appetite and aligned with Scotiabank's overall credit risk strategy and approach.

Settlement risk is the risk that the seller of a currency, commodity, security or service delivers its obligation but does not receive payment/delivery, or that the buyer of a currency, commodity, security or service makes payment/delivery, but does not receive value. This risk combines aspects of credit and operational risk and is significantly mitigated by delivery versus payment, netting agreements and the quality of permitted counterparties.

The Company uses Scotiabank's credit risk rating systems to support the determination of key credit risk parameter estimates which measure credit risk. These risk parameters – probability of default, loss given default and exposure at default – are transparent and are used to provide consistency of credit adjudication for each of the risk rating categories. These credit risk rating systems include an internal grading (I.G.) system for evaluating credit risk. The general relationship between the Company's I.G. codes and external agency ratings is shown below:

Table 16 – Internal Grading Cross Reference

	I.G.	Moody's	S&P
Investment Grade	83 - 99	Aaa to Baa3	AAA to BBB-
Non-Investment Grade	70 - 80	Ba1 to B3	BB+ to B-
Watch list	30 – 65	-	-
Default	21 - 27	-	-

4.2 Approaches to Credit Risk

While the capital requirements for credit risk depend to a significant degree on the creditworthiness of the obligor, CRD IV permits the use of different approaches to the calculation of RWAs: the Standardised Approach and the Internal Ratings-Based ("IRB") approaches.

The Company uses the Standardised Approach for calculating capital requirements for credit risk. This approach involves the application of risk weights to the Company's assets based on the deemed creditworthiness of its debtors and the rules as laid out in the CRR. The Company utilises credit ratings attributed by its chosen External Credit Assessment Institutions ("ECAIs"), Standard and Poor's or Moody's, whichever is the lower, to all its exposure classes. The Company uses the EBA's standard association of ECAI ratings and credit quality steps to map ratings to the relevant credit quality step. In the case of unrated exposures, where a credit rating is not available from either Standard and Poor's or Moody's, the CRR also provides a risk weight depending on the exposure class.

As per the CRR, the following priorities are used in applying the credit assessments:

For exposures to public sector entities (Article 116), institutions (Articles 119 & 121), or in the form of covered bonds (Articles 129 & 121), the ECAIs are applied in the following priority:

1 - Rating of Issue (exposure); 2 - Rating of Issuer (counterparty); 3 - Rating of Central government of jurisdiction of incorporation

For exposures to central governments or central banks (Article 114), multilateral development banks (Article 117), international organisations (Article 118), corporates (Article 122), the ECAIs are applied in the following priority:

1 - Rating of Issue (exposure); 2 - Rating of Issuer (counterparty);

Exposures to rated securitisations are based solely on the rating of the programme.

4.3 Credit Profile of Exposures

The Company adheres to regulatory guidelines with respect to the classification of performing versus non-performing loans, in addition to identifying exposures subject to forbearance measures (see tables 27 to 29). Since transition to IFRS 9, all exposures are assessed for significant increase in credit risk and impairment and classified accordingly. The Company employs the BNS Expected Credit Loss ("ECL") model to estimate credit losses under IFRS 9.

The Company uses the definition of default as set down under Article 178 of the CRR for the purposes of regulatory capital computation relating to all credit exposures and applies this definition for use within any relevant sections of the annual financial statements. In keeping with these requirements, default is considered by the Company to have occurred with regard to a particular obligor when one or more of the following have taken place:

- the Company considers that the obligor is unlikely to pay its credit obligations, without recourse by the Company to actions such as realising security;
- the obligor is past due more than 90 days on any material credit obligation to the Company.

Past due and impaired loans

Based on the above definition, a loan is considered past due and impaired when an obligor has not made a payment for more than 90 days after the contractual due date or there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a 'loss' event) and the loss event (or events) has an impact on the estimated future cash flows. Objective evidence of impairment is recognised when, in management's opinion, there is no longer reasonable assurance that interest and principal payments will be collected based on original contractual terms.

Impairment review and provisions

Impairment assessments necessarily include the use of estimates and expert judgment as management attempts to project the effect of future events on its exposures. Following best practice, the Company regularly reviews and revises key judgements, assumptions and estimates relating to impairment provisioning. The most significant judgements or estimates relate to management's expectations regarding changes in collateral values, timing of cash flows, value attributed to guarantees and cash flows from trading or other sources. The Company documents all key assumptions including explanations outlining why assumptions have been changed. CRD IV introduced the definition of 'specific' and 'general' credit risk adjustments and, in line with the relevant Regulatory Technical Standard ("RTS"), the Company has included all ECL amounts as specific credit risk adjustments.

Template EU CR1 below sets out the Company's performing and non-performing exposures and related provisions.

Table 17 – EU CR1 - Performing and non-performing exposures and related provisions (Article 442(c) & (d))

31 Oct 2021

US$'000

	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			
Cash balances at central banks and other demand deposits	**500,767**	**500,767**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Loans and advances	**721,200**	**612,605**	**108,595**	**16,719**	**-**	**16,719**	**(270)**	**(144)**	**(126)**	**(502)**	**-**	**(502)**	**-**	**661,628**	**16,217**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	18,744	18,744	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	702,456	593,861	108,595	16,719	-	16,719	(270)	(144)	(126)	(502)	-	(502)	-	661,628	16,217
Of which SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Debt securities	**2,256,390**	**2,209,873**	**-**	**-**	**-**	**-**	**(6)**	**(6)**	**-**				**-**	**504,274**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	1,114,416	1,114,416	-	-	-	-	(1)	(1)	-	-	-	-	-	151,784	-
Credit institutions	734,433	734,433	-	-	-	-	(5)	(5)	-	-	-	-	-	301,630	-
Other financial corporations	356,681	310,164	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	50,860	50,860	-	-	-	-	-	-	-	-	-	-	-	50,860	-
Off-balance-sheet exposures	**2,751,439**	**-**	**-**	**-**	**-**	**-**	**123**	**121**	**2**	**-**	**-**	**-**	**-**	**1,817,193**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	9,648	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	2,741,791	-	-	-	-	-	123	121	2	-	-	-	-	1,817,193	-
Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**6,229,796**	**3,323,245**	**108,595**	**16,719**	**-**	**16,719**	**(399)**	**(271)**	**(128)**	**(502)**	**-**	**(502)**	**-**	**2,983,095**	**16,217**

31 Oct 2020

US$'000

	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			
Cash balances at central banks and other demand deposits	**422,263**	**422,263**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Loans and advances	**1,351,517**	**1,263,796**	**87,721**	**18,864**	**-**	**18,864**	**2,489**	**998**	**1,491**	**565**	**-**	**565**	**-**	**1,087,893**	**18,299**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	8,321	8,321	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	101,263	101,263	-	-	-	-	18	18	-	-	-	-	-	-	-
Non-financial corporations	1,241,933	1,154,212	87,721	18,864	-	18,864	2,471	980	1,491	565	-	565	-	1,087,893	18,299
Of which SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Debt securities	**2,008,626**	**2,008,626**	**-**	**-**	**-**	**-**	**30**	**30**	**-**	**-**	**-**	**-**	**-**	**624,178**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	433,961	433,961	-	-	-	-	4	4	-	-	-	-	-	264,304	-
Credit institutions	1,252,148	1,252,148	-	-	-	-	21	21	-	-	-	-	-	174,990	-
Other financial corporations	71,999	71,999	-	-	-	-	1	1	-	-	-	-	-	51,996	-
Non-financial corporations	250,518	250,518	-	-	-	-	4	4	-	-	-	-	-	132,888	-
Off-balance-sheet exposures	**2,096,536**	**2,096,536**	**-**	**-**	**-**	**-**	**571**	**571**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	166,333	166,333	-	-	-	-	2	2	-	-	-	-	-	-	-
Non-financial corporations	1,930,203	1,930,203	-	-	-	-	569	569	-	-	-	-	-	-	-
Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**5,878,942**	**5,791,221**	**87,721**	**18,864**	**-**	**18,864**	**3,090**	**1,599**	**1,491**	**565**	**-**	**565**	**-**	**1,712,071**	**18,299**

Template EU CR1-A below lays out the maturity profile of the Company's exposures as at 31 October 2021.

Table 18 – EU CR1-A - Maturity of exposures (Article 442(g))

31 Oct 2021

US$'000		Net Exposure Value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	4,550	107,776	598,018	27,575	-	737,919
2	Debt securities	-	777,296	1,035,069	444,025	-	2,256,390
3	***Total***	**4,550**	**885,072**	**1,633,087**	**471,600**	**-**	**2,994,309**

Template EU CR2 sets out the changes in the Company's stock of non-performing loans during 2021.

Table 19 – EU CR2 - Changes in the stock of non-performing loans and advances (Article 442(f))

US$'000		**Gross carrying amount 31 Oct 2021**	Gross carrying amount 31 Oct 2020
010	**Initial stock of non-performing loans and advances**	**18,864**	**15,903**
020	Inflows to non-performing portfolios	-	18,864
030	Outflows from non-performing portfolios	-	-
040	Outflows due to write-offs	-	-
050	Outflow due to other situations	(2,145)	(15,903)
060	**Final stock of non-performing loans and advances**	**16,719**	**18,864**

Template EU CQ4 provides a split of the Company's exposures and related provisions by material geographical location (see Appendix 3).

Table 20 – EU CQ4 - Quality of non-performing exposures by geography (Article 442(c) & (d))

31 Oct 2021		a	c	e	f	g
		Gross carrying/nominal amount		Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	US$'000		Of which defaulted			
010	***On-balance-sheet exposures***	***2,994,309***	***16,719***	***(778)***		**-**
020	*Germany*	309,638	-	(7)		-
030	*France*	184,780	-	(2)		-
040	*United States*	569,361	-	(11)		-
050	*Netherlands*	287,779	-	(3)		-
060	*Spain*	90,013	-	(10)		-
061	*Luxembourg*	335,618	-	-		-
070	*Other countries*	1,217,191	16,719	(745)		-
080	***Off-balance-sheet exposures***	***2,751,439***	**-**		***123***	
090	*Germany*	832,357	-		8	
100	*France*	622,620	-		4	
110	*United States*	88,233	-		10	
120	*Netherlands*	333,616	-		1	
130	*Spain*	305,961	-		44	
131	*Luxembourg*	57,273	-		6	
140	*Other countries*	511,379	-		50	
150	***Total***	***5,745,748***	***16,719***	***(778)***	***123***	**-**

Template EU CQ3 provides a split of the Company’s performing and non-performing exposures by days past due.

Table 21 – EU CQ3 - Credit quality of performing and non-performing exposures by past due days (Article 442(d))

31 Oct 2021 US$'000	a	b	c	d	e	f	g	h	i	j	k	l
	Gross carrying amount/nominal amount											
	Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are 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 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
Cash balances at central banks and other demand deposits	**500,767**	**500,767**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Loans and advances	**721,200**	**721,200**	**-**	**16,719**	**16,719**	**-**	**-**	**-**	**-**	**-**	**-**	**16,719**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	18,744	18,744	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	702,456	702,456	-	16,719	16,719	-	-	-	-	-	-	16,719
Of which SMEs	-	-	-	-	-	-	-	-	-	-	-	-
Households	-	-	-	-	-	-	-	-	-	-	-	-
Debt securities	**2,256,390**	**2,256,390**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	1,114,416	1,114,416	-	-	-	-	-	-	-	-	-	-
Credit institutions	734,433	734,433	-	-	-	-	-	-	-	-	-	-
Other financial corporations	356,681	356,681	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	50,860	50,860	-	-	-	-	-	-	-	-	-	-
Off-balance-sheet exposures	**2,751,439**			**-**								**-**
Central banks	-			-								-
General governments	-			-								-
Credit institutions	-			-								-
Other financial corporations	9,648			-								-
Non-financial corporations	2,741,791			-								-
Households	-			-								-
Total	**6,229,796**	**3,478,357**	**-**	**16,719**	**16,719**	**-**	**-**	**-**	**-**	**-**	**-**	**16,719**

31 Oct 2020
US$'000

	a	b	c	d	e	f	g	h	i	j	k	l
	Gross carrying amount/nominal amount											
	Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are 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 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
Cash balances at central banks and other demand deposits	**422,263**	**422,263**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Loans and advances	**1,351,517**	**1,351,517**	**-**	**18,864**	**18,864**	**-**	**-**	**-**	**-**	**-**	**-**	**18,864**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	8,321	8,321	-	-	-	-	-	-	-	-	-	-
Other financial corporations	101,263	101,263	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	1,241,933	1,241,933	-	18,864	18,864	-	-	-	-	-	-	18,864
Of which SMEs	-	-	-	-	-	-	-	-	-	-	-	-
Households	-	-	-	-	-	-	-	-	-	-	-	-
Debt securities	**2,008,626**	**2,008,626**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	433,961	433,961	-	-	-	-	-	-	-	-	-	-
Credit institutions	1,252,148	1,252,148	-	-	-	-	-	-	-	-	-	-
Other financial corporations	71,999	71,999	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	250,518	250,518	-	-	-	-	-	-	-	-	-	-
Off-balance-sheet exposures	**2,096,536**			**-**								**-**
Central banks	-			-								-
General governments	-			-								-
Credit institutions	-			-								-
Other financial corporations	166,333			-								-
Non-financial corporations	1,930,203			-								-
Households	-			-								-
Total	**5,878,942**	**3,782,406**	**-**	**18,864**	**18,864**	**-**	**-**	**-**	**-**	**-**	**-**	**18,864**

Table 18 below details exposures under the standardised approach by risk weight and exposure class. All amounts presented are post Credit Risk Mitigation ('CRM'), post Credit Conversion Factors ('CCF') and net of impairment provisions. CCR is excluded.

Table 22 – EU CR5 – Standardised approach (Article 444(e))

31 Oct 2021
US$'000

		Risk Weight (%)															Total	Of which unrated
	Exposure classes	**0**	**2**	**4**	**10**	**20**	**35**	**50**	**70**	**75**	**100**	**150**	**250**	**370**	**1250**	**Others**		
1	Central governments or central banks	1,030,368	-	-	-	166,879	-	58,327	-	-	-	-	-	-	-	-	1,255,574	-
2	Regional governments or local authorities	14,232	-	-	-	-	-	-	-	-	-	-	939	-	-	-	15,171	939
3	Public sector entities	190,512	-	-	-	150,573	-	-	-	-	-	-	-	-	-	-	341,085	-
4	Multilateral development banks	390,460	-	-	-	24,952	-	-	-	-	-	-	-	-	-	-	415,412	-
5	International Organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	220,907	-	-	-	-	-	-	-	-	-	-	220,907	-
7	Corporates	-	-	-	-	50,881	-	266,090	-	-	1,879,168	-	-	-	-	-	2,196,139	1,280,602
8	Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	16,217	-	-	-	-	16,217	16,217
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	1,637	-	-	-	-	1,637	1,637
12	Covered bonds	-	-	-	105,267	-	-	-	-	-	-	-	-	-	-	-	105,267	-
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Other items	3	-	-	-	-	-	-	-	-	5,956	-	-	-	-	-	5,959	5,959
17	**Total**	**1,625,575**	**-**	**-**	**105,267**	**614,192**	**-**	**324,417**	**-**	**-**	**1,885,124**	**17,854**	**939**	**-**	**-**	**-**	**4,573,368**	**1,305,354**

31 Oct 2020
US$'000

		Risk Weight (%)															Total	Of which unrated
	Exposure classes	**0**	**2**	**4**	**10**	**20**	**35**	**50**	**70**	**75**	**100**	**150**	**250**	**370**	**1250**	**Others**		
1	Central governments or central banks	632,416	-	-	-	95,630	-	58,587	-	-	-	-	-	-	-	-	**786,633**	420,482
2	Regional governments or local authorities	29,461	-	-	-	-	-	-	-	-	-	-	180	-	-	-	**29,641**	-
3	Public sector entities	303,614	-	-	-	302,174	-	-	-	-	-	-	-	-	-	-	**605,788**	-
4	Multilateral development banks	509,532	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**509,532**	-
5	International Organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	148,010	-	-	-	-	-	-	-	-	-	-	**148,010**	18
7	Corporates	-	-	-	-	161,612	-	424,008	-	-	2,022,670	86,205	-	-	-	-	**2,694,495**	1,325,697
8	Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	18,299	-	-	-	-	**18,299**	18,299
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	13,670	-	-	-	-	**13,670**	13,670
12	Covered bonds	-	-	-	28,764	-	-	-	-	-	-	-	-	-	-	-	**28,764**	-
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Other items	4	-	-	-	-	-	-	-	-	8,687	-	-	-	-	-	**8,691**	8,691
17	**Total**	**1,475,027**	**-**	**-**	**28,764**	**707,426**	**-**	**482,595**	**-**	**-**	**2,031,357**	**118,174**	**180**	**-**	**-**	**-**	**4,843,523**	1,786,857

The 2020 comparatives for template EU CR5 have been amended to exclude items deduced from capital (software assets) in line with the new format defined by the Commission Implementing Regulation (EU) 2021/637.

Template EU CQ5 provides a split of the Company's loans and advances by industry.

Table 23 – EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry (Article 442(c) & (e))

	31 Oct 2021 US$'000	Gross carrying amount		Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted		
010	Agriculture, forestry and fishing	59,764	-	(1)	-
020	Mining and quarrying	91,873	16,719	(513)	-
030	Manufacturing	96,255	-	(17)	-
040	Electricity, gas, steam and air conditioning supply	-	-	-	-
050	Water supply	104,893	-	(5)	-
060	Construction	31,686	-	(10)	-
070	Wholesale and retail trade	62,742	-	(4)	-
080	Transport and storage	158,767	-	(130)	-
090	Accommodation and food service activities	-	-	-	-
100	Information and communication	-	-	-	-
110	Financial and insurance activities	-	-	-	-
120	Real estate activities	-	-	-	-
130	Professional, scientific and technical activities	-	-	(1)	-
140	Administrative and support service activities	113,195	-	(91)	-
150	Public administration and defense, compulsory social security	-	-	-	-
160	Education	-	-	-	-
170	Human health services and social work activities	-	-	-	-
180	Arts, entertainment and recreation	-	-	-	-
190	Other services	-	-	-	-
200	***Total***	***719,175***	***16,719***	***(772)***	**-**

4.4 Credit Risk Mitigation

Table 24 – EU CR3 - CRM techniques overview: Disclosure of the use of credit risk mitigation techniques (Article 453(f))

	31 Oct 2021	Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	
						Of which secured by credit derivatives
	US$'000	a	b	c	d	e
1	Loans and advances	560,066	677,845	377,026	300,819	-
2	Debt securities	1,441,952	504,274	-	504,274	
3	Total	2,002,018	1,182,119	377,026	805,093	-
4	*Of which non-performing exposures*	-	16,217	16,217	-	-
EU-5	*Of which defaulted*	-	16,217			

	31 Oct 2020	Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	
						Of which secured by credit derivatives
	US$'000	a	b	c	d	e
1	Loans and advances	683,438	1,106,192	687,832	418,359	-
2	Debt securities	2,006,200	624,178	-	624,178	
3	Total	2,689,638	1,730,369	687,832	1,042,537	-
4	*Of which non-performing exposures*	-	18,299	18,299	-	-
EU-5	*Of which defaulted*	-	18,299			

The 2020 comparatives for template EU CR3 have been amended to follow the updated guidance in line with the new format defined by the Commission Implementing Regulation (EU) 2021/637.

The above template EU CR3 sets out all CRM techniques used by the Company regardless of whether these techniques are recognised under CRR, including all types of collateral and financial guarantees used for all secured exposures.

The Company uses two methods of credit risk mitigation: direct and indirect. Where CRM is eligible under the CRR it is used to reduce credit exposures in the regulatory capital calculations.

Direct mitigating methods

The main direct credit risk mitigation is the taking of security or collateral. The Company holds collateral in respect of certain exposures including corporate loans, securities held as part of repurchase agreements and/or OTC derivative activity. Collateral is not usually held against investment securities, and no such collateral was held during the year. The types of collateral that the Company is willing to accept under OTC derivative transactions and repurchase agreements are guided by advice and counsel from Scotiabank GRM and are set out in Limit Documents approved by the Company. The acceptable types of collateral are reviewed on an annual basis as part of the annual limit review process. A variety of types of collateral are accepted against corporate loan advances, including securities, cash, guarantees and insurance, grouped broadly as follows: Financial collateral (lien over deposits, shares, etc.); Physical collateral (mortgage over aircraft, etc.); Other collateral (guarantees, insurance, etc.). The Company is not currently using credit derivatives to mitigate risk.

Parental guarantees are utilised in corporate lending arrangements and guarantees are also in place from corporates or sovereigns in respect of certain securities holdings. Guarantees improve the credit quality of the exposures.

The Company may enter into sub-participation agreements with Scotiabank entities on occasion which result in the transfer of a portion of exposure by the Company to these entities on either a funded or unfunded basis.

Indirect mitigating methods

Indirect credit risk mitigants are generally embedded in the structure of the individual transaction to minimise the impact of an external event on the obligor e.g. the requirement for the obligor to hedge interest rates and input material prices or insure assets or receivables.

In addition, credit risk is also mitigated by policy and procedural controls and regular monitoring and reporting of risks to facilitate effective management oversight.

Credit risk concentrations within risk mitigation

As noted in section 3, concentration risk has been recognised as a principal risk. The Company recognises that insufficient diversification of credit risk mitigation techniques increases credit concentration risk. A highly concentrated portfolio has more potential for extreme outcomes and could prevent the effectiveness of the credit risk mitigants used. The Company has a Board approved Concentration Risk Management Framework and Policy, which has been subject to advice and counsel from Scotiabank GRM.

The Company seeks to avoid excessive risk concentrations through a diversified mix of businesses, products, geographies, currencies and customers. Appropriate management of concentration risk is also ensured by limits, policies and procedures (refer to risk appetite metrics, table 15 in section 3.2). Oversight of the management of concentration risk includes management committee and Board review and approval of policies and limits relating to credit risk, among other principal risks, as well as quarterly reporting to the BRC on risk concentrations and stress testing on sectors where a material concentration is deemed to arise. No material concentration has arisen as a result of the credit risk mitigation measures which would prevent their effectiveness.

Table 25 – EU CR4 – Standardised approach – Credit risk exposure and CRM effects (Article 453 (g), (h) & (i))

	31 Oct 2021 US$'000	a	b	c	d	e	f	31 Oct 2020					
		Exposures before CCF and CRM		**Exposures post CCF and CRM**				Exposures before CCF and CRM		Exposures post CCF and CRM			
	Exposure classes	**On-balance sheet amount**	**Off-balance sheet amount**	**On-balance sheet amount**	**Off-balance sheet amount**	**RWAs**	**RWA density**	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWAs	RWA density
1	Central governments or central banks	1,255,574	-	1,255,574	-	62,539	4.98%	786,633	-	786,633	-	48,420	6.16%
2	Regional governments or local authorities	15,171	-	15,171	-	2,347	15.47%	29,641	-	29,641	-	449	1.51%
3	Public sector entities	341,085	-	341,085	-	30,115	8.83%	605,788	-	605,788	-	60,435	9.98%
4	Multilateral development banks	415,412	-	415,412	-	4,990	1.20%	509,532	-	509,532	-	-	-
5	International Organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	220,907	-	220,907	-	44,182	20.00%	148,010	-	148,010	-	29,602	20%
7	Corporates	768,947	2,882,782	768,947	1,427,192	2,022,389	92.09%	1,671,519	2,095,965	1,671,519	1,022,976	2,396,299	88.93%
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	16,217	-	16,217	-	24,326	150%	18,299	-	18,299	-	27,448	150%
11	Exposures associated with particularly high risk	1,637	-	1,637	-	2,455	150%	13,670	-	13,670	-	20,506	150%
12	Covered bonds	105,267	-	105,267	-	10,527	10.00%	28,764	-	28,764	-	2,876	10.00%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
14	Collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity	-	-	-	-	-	-	-	-	-	-	-	-
16	Other items	5,959	-	5,959	-	5,956	99.95%	8,970	-	8,970	-	12,175	135.73%
17	**Total**	**3,146,176**	**2,882,782**	**3,146,176**	**1,427,192**	**2,209,826**	**48.32%**	3,820,826	2,095,965	3,820,826	1,022,976	2,598,210	53.64%

In contrast to template EU CR3, the above template EU CR4 provides details only on the effects of CRM techniques recognised under CRR, along with credit conversion factors, on the Company's credit risk exposures. EU CR4 is not reflective of the total volume of exposures against which collateral and guarantees are held, nor does it reflect the full range of credit risk mitigation taken. A significant portion of the exposures included in the table (exposures unsecured carrying amount) benefit from security taken to mitigate credit risk, but this security is not eligible for use in the regulatory capital calculations.

Forbearance

Forbearance occurs when a borrower is granted a temporary or permanent concession or an agreed change to the terms of a loan ('forbearance measure') for reasons relating to the actual or apparent financial stress or distress of that borrower. A concession may involve restructuring the contractual terms of a debt or payment in some form other than cash, such as an equity interest in the borrower.

Prior to any decision to grant forbearance the Company performs an assessment of a borrower's financial circumstances and ability to repay. This assessment includes an individual assessment for impairment of the loan.

SIDAC has introduced thresholds with respect to material credit-related economic losses for asset sales (set at 5%), and diminished financial obligations under a distressed restructuring (set at 1%), in line with the EBA Guidelines on the application of the definition of default. Any breach of either threshold is considered an indicator of unlikeliness to pay and therefore constituting a default classification.

Further details of SIDAC's approach to risk classifications are set out in the Credit Loss & Provisioning Policy and associated procedures.

Template EU CQ1 presents the gross carrying amount of forborne exposures and the related accumulated impairment, and collateral and financial guarantees received.

Table 26 – EU CQ1 – Credit quality of forborne exposures (Article 442 (c))

	31 Oct 2021	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
	US$'000			Of which defaulted	Of which impaired				
005	**Cash balances at central banks and other demand deposits**	-	-	-	-	-	-	-	-
010	**Loans and advances**	**108,595**	**16,719**	**16,719**	**16,719**	**(126)**	**(502)**	**124,687**	**16,217**
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	108,595	16,719	16,719	16,719	(126)	(502)	124,687	16,217
070	*Households*	-	-	-	-	-	-	-	-
080	**Debt securities**	-	-	-	-	-	-	-	-
090	**Loan commitments given**	**11,355**	-	-	-	**2**	-	-	-
100	**Total**	**119,950**	**16,719**	**16,719**	**16,719**	**(128)**	**(502)**	**124,687**	**16,217**

	31 Oct 2020	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
	US$'000			Of which defaulted	Of which impaired				
005	**Cash balances at central banks and other demand deposits**	-	-	-	-	-	-	-	-
010	**Loans and advances**	-	**18,864**	**18,864**	**18,864**	-	**(565)**	**18,299**	**18,299**
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	-	18,864	18,864	18,864	-	(565)	18,299	18,299
070	*Households*	-	-	-	-	-	-	-	-
080	**Debt securities**	-	-	-	-	-	-	-	-
090	**Loan commitments given**	-	-	-	-	-	-	-	-
100	**Total**	-	**18,864**	**18,864**	**18,864**	-	**(565)**	**18,299**	**18,299**

4.5 Counterparty Credit Risk

As per CRR Article 272, CCR is defined as the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. The Company's primary sources of CCR are derivatives and repurchase agreements (all risk mitigated by Credit Support Annexes ("CSAs") and other margining arrangements).

SIDAC mitigates counterparty risk in a number of ways. A prerequisite for transacting OTC derivatives with counterparties is to ensure a CSA is in place. The Company is compliant with variation margin rules for Non-Centrally Cleared Derivatives. This in effect reduces variation margin thresholds to zero. The Company now transacts interest rate swaps via Central Counterparty clearing ("CCP") (facilitated by Scotiabank) which mitigates counterparty credit risk. These techniques are documented in standard trading agreements. Counterparty limits are set by the Company for each individual counterparty, guided by advice and counsel from Scotiabank GRM. Sub-limits can be put in place for each product type. The risk is monitored independently by CRF on a daily basis.

Netting and collaterals held

Legal agreements providing for enforceable master netting arrangements are put in place with counterparties, guided by Scotiabank legal counsel. These include International Swaps and Derivatives Association ("ISDA") agreements and collateral arrangements (Global Master Repurchase Agreement ("GMRA") and CSA). Note that these arrangements do not meet the criteria for offsetting in the balance sheet. This is because they create for the parties to the agreement a right of set-off of recognised amounts that is enforceable only following an event of default, insolvency or bankruptcy of the Company or the counterparties or following other predetermined events. In addition, the Company and its counterparties do not intend to settle on a net basis or to realise the assets and settle the liabilities simultaneously.

The Company is unrated by ECAIs and so is not exposed to the effects of a downgrade of its own credit rating. There is also no risk of increased collateral requirements as a result of a downgrade of the Company's parent as the Company's credit support agreements do not allow for triggers for the posting of additional collateral due to increased counterparty risk.

Collateral arising in respect of any credit risk exposures is managed through daily monitoring and by comparison of mark-to-market values of applicable positions against collateral calls. With regard to repurchase agreements, when the values exceed collateral thresholds, collateral calls are made. The acceptable types of collateral are reviewed on an annual basis as part of the annual limit review process.

When calculating the CVA capital charge, the Company uses the Standardised Approach, as permitted by the Regulation.

Table 27 – EU CCR5 – Composition of collateral for exposures to CCR (Article 439(e))

	31 Oct 2021	Collateral used in derivative transactions				Collateral used in SFTs			
	US$'000	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Collateral type	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	-	-	-	-	-	-	-	-
2	Cash – other currencies	-	10,820	-	-	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-
4	Other sovereign debt	-	-	-	-	-	-	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	29,253
7	Equity securities	-	-	-	-	-	6	-	6
8	Other collateral	-	-	-	-	-	-	-	-
9	**Total**	**-**	**10,820**	**-**	**-**	**-**	**6**	**-**	**29,259**

	31 Oct 2020	Collateral used in derivative transactions				Collateral used in SFTs			
	US$'000	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Collateral type	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	-	-	-	-	-	-	-	-
2	Cash – other currencies	-	1,520	-	-	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-
4	Other sovereign debt	-	-	-	-	-	-	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	**Total**	**-**	**1,520**	**-**	**-**	-	-	-	-

The template EU CCR5 on the previous page and comparative above provides a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions and to SFTs.

Table 28 – EU CCR1 – Analysis of CCR exposure by approach (Article 439(f), (g) & (k))

31 Oct 2021

US$'000		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	RWEA
EU-1	EU - Original Exposure Method (for derivatives)				1.4				
EU-2	EU - Simplified SA-CCR (for derivatives)				1.4				
1	SA-CCR (for derivatives)	2,651	32,979		1.4	107,759	49,882	49,882	18,756
2	IMM (for derivatives and SFTs)								
2a	*Of which securities financing transactions netting sets*								
2b	*Of which derivatives and long settlement transactions netting sets*								
2c	*Of which from contractual cross-product netting sets*								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)					29,259	1,802	1,802	1
5	VaR for SFTs								
6	**Total**					137,018	51,684	51,684	18,757

31 Oct 2020

US$'000		Notional	Replacement cost / current market value	Potential future credit exposure	EEPE	Multiplier	EAD post CRM	RWAs
1	Mark to market		191	11,562			11,753	5,819
9	Financial collateral comprehensive method (for SFTs)						-	-
11	**Total**		191	11,562			11,753	5,819

Template EU CCR1 above sets out the methods the Company uses to calculate CCR regulatory requirements. Note that the comparative relates to the regulatory requirements prior to the introduction of SA-CCR in 2021 which is the main driver of the increase in exposures from derivatives.

Table 29 – EU CCR2 – Transactions subject to own funds requirements for CVA risk (Article 439(h))

	US$'000	Exposure value 31 Oct 2021	RWEA 31 Oct 2021	Exposure value 31 Oct 2020	RWEA 31 Oct 2020
1	Total transactions subject to the Advanced method	-	-	-	-
2	(i) VaR component (including the 3× multiplier)		-	-	-
3	(ii) stressed VaR component (including the 3× multiplier)		-	-	-
4	Transactions subject to the Standardised method	49,889	11,337	11,753	2,639
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-	-	-
5	**Total subject to the CVA capital charge**	**49,889**	**11,337**	**11,753**	**2,639**

Table 30 – EU CCR3 – CCR exposures by regulatory portfolio and risk weight – Standardised Approach (Article 444(e))

31 Oct 2021

US$'000		Risk weight (%)											
	Exposure classes	**0**	**2**	**4**	**10**	**20**	**50**	**70**	**75**	**100**	**150**	**Others**	**Total exposure value**
1	Central governments or central banks	1,795	-	-	-	-	-	-	-	-	-	-	1,795
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	20,624	29,265	-	-	-	-	-	49,889
7	Corporates	-	-	-	-	-	-	-	-	-	-	-	-
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**1,795**	**-**	**-**	**-**	**20,624**	**29,265**	**-**	**-**	**-**	**-**	**-**	**51,684**

31 Oct 2020

US$'000		Risk weight (%)											
	Exposure classes	**0**	**2**	**4**	**10**	**20**	**50**	**70**	**75**	**100**	**150**	**Others**	**Total exposure value**
1	Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	191	11,562	-	-	-	-	-	11,753
7	Corporates	-	-	-	-	-	-	-	-	-	-	-	-
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**-**	**-**	**-**	**-**	**191**	**11,562**	**-**	**-**	**-**	**-**	**-**	**11,753**

Template EU CCR2 provides detail of the Company's CVA charge and calculation approach while template EU CCR3 provides a breakdown of CCR by exposure class and risk weight. As noted above, the increase in exposures from derivatives is due mainly to the introduction of SA-CCR in 2021.

On the following page, template EU CCR8 provides a breakdown of the Company's exposures to CCPs. There were no exposures to CCPs in the prior year.

Table 31 – EU CCR8 – Exposures to CCPs (Article 439(i))
31 Oct 2021

	US$'000	Exposure value	RWEA
1	**Exposures to QCCPs (total)**		**211**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	-	-
3	(i) OTC derivatives	-	-
4	(ii) Exchange-traded derivatives	-	-
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	-	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	2,911	211
10	Unfunded default fund contributions	-	-
11	**Exposures to non-QCCPs (total)**		-
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	-	-

4.6 Credit Risk Stress Testing

SIDAC performs quarterly credit stress tests (industry credit stress test and risk weighted assets stress test) which are presented to CC/ALCO respectively and the BRC. The first represents a general recessionary environment that is not rooted in macroeconomic variables, but rather characterised by a prolonged global economic downturn, which greatly impacts the economic growth in the region. The IG ratings of individual borrowers within their respective industries are generated using the specific risk factors pertinent to each of these industries through BNS internal rating models. These factors include the financial strength of the borrower, expected changes in market conditions, and industry specific factors. Changes in these risk factors as a result of the stress scenario are translated into a migration of the borrower's credit risk rating and the primary measure of impact is the increase in expected credit losses (ECL). The stress test results in an instantaneous shock to the portfolio assuming the rating migration of the borrowers occurred.

In addition, SIDAC performs an annual securitisation stress test which addresses the credit risk of the underlying pool, including default risk and tranche overcollateralization

SIDAC has adopted the Scotiabank model for the computation of expected losses under stressed conditions for inclusion in its ICAAP Enterprise Wide Stress Test (EWST). A stressed credit risk impact is estimated, based on the model, by translating the macro-economic environment projected in each scenario into credit downgrade scenarios.

4.7 Wrong-way Risk

Wrong-way risk is a form of CCR which occurs when the exposure to a counterparty is adversely correlated with the credit quality of that counterparty, causing the default risk and credit exposure to increase together. The Company's derivative counterparty risks and CVA are potentially sensitive to wrong-way risks. These risks are managed and monitored through limit controls at counterparty level resulting in minimal wrong-way risk exposures, with stress testing undertaken daily. The approach for managing wrong-way risk is called out in SIDAC's Credit Risk Management Policy, in addition to the Counterparty Credit Risk Management Framework and Traded Products Manual.

5 Market Risk and Interest Rate Risk in the Banking Book (IRRBB)

The below disclosures are made under Article 435 (1)(a), (b), (c) & (d)

5.1 Risk management objectives and policies

Market Risk is the current or prospective risk to earnings and capital arising from adverse movements in asset prices, foreign exchange rates and interest rates. This can arise from dealing in debt and equity securities, currencies, or derivatives. While SIDAC's authorisation was expanded in 2021 with the establishment of Capital Markets activity, trading did not commence until October 2021, therefore there was no materially active trading book in SIDAC at fiscal year-end.

5.2 Market Risk Governance Process

The Board has overall responsibility for market risk oversight and is supported in this by the BRC and ALCO. SIDAC operates a "Three Lines of Defence" model in relation to the daily management of market risk:

- The first line consists of the Treasury and Capital Markets business lines who are responsible for the day-to-day management of Market Risk.
- The second line is represented by Trade Floor Risk Management (TFRM) within Risk Management who are responsible for:
  - providing review and challenge;
  - measuring monitoring and reporting of exposures vs limits;
  - ensuring compliance vis-a-vis the Market and Structural Risk Management Framework and Policy and overall Risk Appetite.
- The third line is Internal Audit who provides independent assurance to the Board and Senior Management regarding the effective operation of the market risk governance, risk management and control processes established and maintained by the first and second lines.

5.3 Scope and Nature of Risk Reporting Measurement Systems

SIDAC's Treasury unit and Capital Markets business are responsible for managing and hedging non-traded market risk, managing positions against approved Board and ALCO market risk limits. They utilise several techniques to manage, mitigate and hedge non-trading market risk, including balance sheet duration matching and entering offsetting transactions with balance sheet or derivative hedging products. Hedging derivatives are currently transacted with parent bank/affiliated entities or regulated financial counterparts.

Other measurement techniques such as gap and scenario analysis are also conducted to provide insight into, and assist in managing, underlying non-trading market risks. Each of these are reported as appropriate to risk management committees.

SIDAC holds Pillar 2 capital to mitigate non-trading market risk, the results of which are generated from an Economic Internal Capital model for capital charges and includes all non-trading positions, with a rolling 10-year observation period and market volatility scaled to one year and a confidence level of 99.95%.

5.4 Measurement and Reporting of Individual Market Risk

5.4.1 Interest Rate Risk

Interest rate risk arises from Treasury activities in SIDAC, principally in relation to the Investment positions held for liquidity management purposes and Capital Markets activities. Part of the Company's return on financial instruments is obtained from controlled mismatching of the dates on which interest receivable on assets and payable on liabilities is next reset.

All aspects of this risk are closely monitored and controlled. The Board articulates its appetite for Market Risk, in the RAF, setting limits and approving the annual Business Plan and policy papers. Risk appetite limits along with early warning indicators are set to control SIDAC's market and structural risk exposures, and to highlight any potential weaknesses or pressure points. The RAF limits are approved at least annually by the Board. Performance against these metrics is monitored and reported by Risk Management to ALCO and ExCo monthly, and to the BRC on a quarterly basis. RAF limits under this category include Net Interest Income (NII), Economic Value of Equity (EVE), Credit Spread Volatility Risk CS01, Value at Risk (VaR) and Stressed Value at Risk (sVaR).

Additionally, interest rate risk is also measured, monitored and controlled via ALCO limits including DV01 and product specific limits. Further disclosures with respect to interest rate risk exposures is provided below.

5.4.2 Foreign Exchange Risk

The Company's foreign exchange risk consists of residual risk arising from foreign exchange funding position management (via FX swaps), nostro balances and non-functional currency profits.

An additional tool for measuring market risk is the VaR measure. SIDAC's market risk VaR calculation is performed by GRM based on Scotiabank's approved methodology and position information provided by SIDAC. The Scotiabank VaR model is a historical simulation model based on 300 business days of market data, a 1 day holding period and a 99% confidence level. The VaR result is calculated daily and reviewed by Risk Management and Front Office. As at 31st October 2021, in the absence of an active Trading book, SIDAC's VaR comprised predominantly of FX forwards arising from the funding and risk management of non-USD exposures and was de minimis at US$23k. The results are also reviewed by the ALCO and are reported to the BRC on a quarterly basis as part of SIDAC's overall Board-approved VaR and stressed VaR limits.

In addition to VaR the Company also utilises specific product and maturity limits to limit foreign exchange market risk.

From a Pillar 1 perspective, foreign exchange risk was the only market risk applicable to SIDAC at 31st October 2021. Template EU MR1 details the risk weighted exposure amounts for market risk under the Standardised Approach. The movement in 2021 is due mainly to a reduction in net long EUR positions,

Table 32 – EU MR1 – Market Risk under the Standardised Approach (Article 445)

US$'000		**RWEAs**	RWAs
		31 Oct 2021	31 Oct 2020
	Outright products		
1	Interest rate risk (general and specific)	-	-
2	Equity risk (general and specific)	-	-
3	Foreign exchange risk	15,935	65,519
4	Commodity risk	-	-
	Options		
5	Simplified approach	-	-
6	Delta-plus approach	-	-
7	Scenario approach	-	-
8	Securitisation (specific risk)	-	-
9	**Total**	**15,935**	**65,519**

5.4.3 Credit Spread Risk

SIDAC's credit spread risk arises from holdings in bonds and securities as the market value of such holdings can change as a result of credit spread changes (credit spread is defined as the difference between the yield of a bond and the equivalent risk-free rate - considered to be the AA Interest Rate Swap curve).

Credit spread risk is controlled by setting a maximum Credit Spread 01 (CS01) RAF sensitivity limit. The CS01 is the change in the value of the bond portfolio for a 1 basis point increase in yields. The CS01 is calculated and reported daily to Treasury and Senior Management and forms part of the standard ALCO and BRC reporting packs.

Credit spread risk is considered a material risk and Pillar 2 Capital is calculated quarterly based on an approved model which calculates credit spread volatility over a 1-year period, to a 99.95% confidence level and a historical database period from June 2009 to date.

5.5 Policies for Hedging and Mitigating Market Risk

SIDAC mitigates market risk through the use of derivatives, has approved products and limits for this purpose and has experience in employing this strategy across a range of portfolios. In addition to the financial tools used to mitigate this risk, the Company has established a robust market risk framework which takes an integrated approach to identifying the sources of market risk ensuring that the risk is measured, monitored and controlled. SIDAC's Market and Structural Risk Management Framework and Policy clearly defines and describes the principles for identifying, measuring, monitoring and reporting its market risk, clearly articulating roles and responsibilities

5.6 Disclosure of the Exposure to Interest Rate Risk on Positions not Held in the Trading Book (Article 448)

Sources of Non-Trading Market Risk (Article 448(1)(a),(b)&(f))

As noted above, the main type of non-trading market risks which SIDAC are subject to are:

- Interest rate risk in the Banking Book (IRRBB) from mismatches with respect to final maturity, re-pricing date or basis risk.
- Credit spread risk associated with the risk of widening HTC&S bond credit spreads (net of bond and swap movements) impacting on HTC&S reserves via FVOCI and capital ratios.
- Foreign exchange – structural mismatch between currency assets and liabilities – mainly unhedged foreign currency P&L.

Interest Rate Risk Definition (Article 448(1)(e))

Interest rate risk arises from changes in the level of interest rates, changes in the shape of the yield curve, interest rate basis risk and re-pricing risk, which can affect any structural and duration mismatches between assets and liabilities in the balance sheet, and which can generate a risk to earnings or capital. SIDAC is primarily exposed to re-price, yield curve and basis risk.

In line with internal policies and regulatory standards, the framework for IRRBB measures interest rate risk exposures from both a market perspective through the Economic Value of Equity (EVE) and from an earnings perspective through Net Interest Income (NII).

IRRBB Management and Mitigation Strategies (Article 448(1)(f))

All Interest rate sensitive assets/liabilities are present valued using the appropriate risk-free curve and then a standard present value of a one basis point change in interest rate (DV01) is calculated for every deal. The DV01's are then bucketed into currency and yield curve tenor points to provide an overall interest rate gap. To calculate the various EVE and NII interest rate exposure measures the present value is shocked by the policy and regulatory interest rate shocks. The main EVE and NII calculations are supplemented by DV01 reports, desk level position reports and stress testing.

SIDAC's Board defines its appetite for IRRBB risk through the setting of limits and other controls. Additionally, Board approved limits are supplemented by ALCO approved limits and controls.

Assumptions (Article 448(1)(c) & 448(2))

All transactions are included at their contractual re-pricing schedules. SIDAC does not have products that require behavioural assumptions. Capital is excluded as considered non-rate sensitive.

Economic Value of Equity (EVE) (Article 448(1)(e) & 448(2))

The EVE component of the IRRBB framework forms a key part of the IRRBB measurement tools for the Bank and is designed to protect Shareholder's equity. It represents the maximum before-tax effect of a +/- 100 bp parallel shift in yield curves on the net present value of SIDAC's assets and liabilities.

The risk positions are recalculated daily with updated market curves and positions. The positions are present valued using the latest market curves and then shocked according to the relevant policy/regulatory interest rate shock.

Net Interest Income (NII)

The NII component is designed to protect short term revenue. NII is calculated daily and measures the net potential loss in Net Interest Income over the next year of the balance sheet with respect to a standard +/-100 basis point shock (one of these scenarios will create a loss).

Additional Interest Rate Stress Testing

SIDAC also performs the "Standardised Interest Rate Shocks" as outlined in the 2018 EBA Guidelines on the management of interest rate risk arising from non-trading book activities. This involves calculating the impact on EVE of a sudden parallel +/- 200 basis point shift and determining if the decline in EVE is greater than 20% of SIDAC's own funds. If the decline in EVE is greater than 20% of SIDAC's own funds, SIDAC will immediately report to the regulator. SIDAC Risk Management run the six other prescribed interest rate scenarios and compare the results daily to the outlier test figure of 15% of own funds.

The results of these scenarios are reported daily to Treasury, with the most severe scenario reported monthly to ALCO and quarterly to the Board Risk Committee.

Table EU IRRBB1 below details changes in EVE under each supervisory interest rate shock scenario and NII under both the parallel up and parallel down scenarios for the current and previous period. SIDAC does not have any assumptions different from those used for disclosure of this template.

Table 33 – EU IRRBB1 – Interest rate risks of non-trading book activities (Article 448(1)(a),(b))

Supervisory shock scenarios		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
US$ millions		**31 Oct 2021**	31 Oct 2020	**31 Oct 2021**	31 Oct 2020
1	Parallel up	(38.8)	(14.6)	24.6	29.06
2	Parallel down	13.9	2.9	(12.4)	(14.4)
3	Steepener	(1.9)	1.3		
4	Flattener	(11.5)	(11.4)		
5	Short rates up	(24.5)	(16.6)		
6	Short rates down	9.8	2.8		

Explanation of the significance of the IRRBB measures and of their significant variations since previous disclosures (Article 448(1)(d))

In 2020, the most severe scenario loss was parallel up from an EVE perspective at $14.6mm. In 2021 the Parallel Up on an EVE basis was the most severe at $38.8mm. The increase for 2021 related primarily to an increase in assets within the 2–5-year maturity buckets year on year. With respect to NII, the loss was created by the parallel down scenario in both 2020 and 2021, with the reduction in 2021 attributable to a lower impact of negative rate flooring and an increase in fixed rate assets, reducing NII sensitivity.

6 Operational Risk

Operational risk is the risk of loss, whether direct or indirect, to which the Company is exposed due to external events, human error, or the inadequacy or failure of processes, procedures, systems or controls. The Company views outsourcing and third-party risk to be a subset of operational risk.

All of the Basel operational event classes and event types are considered in the review of operational risk. Internal factors, such as the internal control environment and external factors, such as macroeconomic conditions, external threats (e.g. fraud/crime) and the legal/regulatory environments all contribute to levels of operational risk. The Company has identified its top operational risk concerns as follows: Change Management, Cyber Security, Pandemic & Business Resilience, Regulatory Compliance and Third Party Risk Management/Outsourcing.

6.1 Operational Risk Management and Risk Measures

The Company's objective is to manage Operational risk so as to balance the avoidance of financial losses and damage to the Company's reputation with overall cost effectiveness and control procedures that do not restrict initiative and creativity. Within these parameters the Company operates by following the Operational and Compliance policies and controls approved by the Board and Operational Risk Committee (ORC). Application of these policies and procedures is monitored by the Risk Management, Compliance and Internal Audit functions.

Senior Management is responsible for ensuring that internal controls designed to minimise operational risk are in place and that all staff are trained to understand their responsibilities in identifying and reporting operational risk events ("OREs"). Furthermore, periodic Risk Control and Self-Assessments (RCSAs) are conducted by the selected business lines, operational areas and control functions of the Company. The resulting reports are challenged by Risk Management, reviewed by ORC and approved by Senior Management.

The overarching documents for operational risk are the Scotiabank Operational Risk Framework adopted by the Board along with a SIDAC Addendum reflecting local requirements. In addition, advice and counsel is received from Scotiabank GRM on the addendum. Additional supporting BNS policies include the BNS New Initiative Risk Management policy, the BNS Model Risk Management Policy, the BNS Business Continuity Management Policy, the Global Third Party Risk Management Policy and the BNS Internal Control Policy, adopted by the Board each with a local addendum.

The Company recognises the range of operational risks that are inherent in any organisation and uses appropriate Key Risk Indicators ("KRIs") to monitor each category. KRIs are reviewed by the ORC and presented quarterly to the AC. The AC report also includes qualitative measures of operational risk and a summary and analysis of operational risk events.

Procedures exist for the identification, assessment and reporting of operational risk events, with reports being evaluated and categorised for severity by the owner and reviewed and challenged by the Risk Management function. Reporting of OREs, including analysis of root cause and any trends or potential systemic issues, is provided to ORC. Remedial action identified as required is tracked by the Risk Management function for completion and progress or delinquency is reported to the ORC. Regulatory reporting for Operational risk is also a requirement as a condition of the Company's banking licence and this is produced quarterly by the Risk Management function.

6.2 Methodology and Approaches to Operational Risk

The CRR sets out three approaches for calculating exposure values and capital requirements for operational risk: Basic Indicator Approach, Standardised Approach, and the Advanced Measurement Approach. The Company has elected to use the Basic Indicator Approach. This requires the Company to hold a capital amount equal to 15% of the average of the sum of net interest income and net non-interest income for the three preceding 12-month financial periods for which audited financial information is available.

The Company uses a Scenario Analysis ("SA") process for the management of operational risk. SA is an integral part of operational risk management as it allows the entity to identify potential weaknesses in its control framework, which might lead to an operational risk exposure. Therefore, this exercise enables the business to create appropriate action plans in order to mitigate risk exposures in the future, promptly addressing any weaknesses identified. SA leverages a number of internal and external data sources, looking at both past data and future trends. This process supports the Internal Capital Assessment and the Pillar 2 computation.

Template EU OR1 below provides the details of the Company's operational risk calculation under the basic indicator approach.

Table 34 – EU OR1 – Operational risk own funds requirements and risk-weighted exposure amounts (Article 446)

31 Oct 2021		Relevant Indicator			Own funds requirements	Risk exposure amount
US$'000		2019	2020	2021		
1	Banking activities subject to basic indicator approach (BIA)	139,562	89,525	75,296	15,219	190,239
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	-	-	-	-	-
3	*Subject to TSA:*	-	-	-		
4	*Subject to ASA:*	-	-	-		
5	Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

6.3 Operational Risk Mitigation

The Company has put in place policies and procedures to mitigate each of the key elements of operational risk as described above. Operational risk is also mitigated through the holding of capital in the form of Pillar 1 regulatory capital and Pillar 2 capital. SIDAC's Pillar 2 Internal Capital Adequacy Assessment is based on a Scenario Analysis approach. In addition to the scenarios, SIDAC also employs a correlation matrix which assesses the likelihood of two scenarios occurring at the same time. It is based on the assumption that not all scenarios are likely to materialise simultaneously. The correlation matrix therefore allows for the computation of a 'diversification benefit'. The Pillar 2 charge is computed as the excess of the Internal Capital Adequacy Assessment over the Pillar 1 amount.

6.4 Operational Risk Stress Testing

Within its Enterprise Wide/ICAAP stress testing SIDAC includes stresses for operational risk which are scenario based. SIDAC includes severe yet plausible operational risks events, selecting those for inclusion after considering a suite of operational risk scenarios.

7 Cyber Security & Information Technology risk

Cyber Security & Information Technology (IT) risk is categorised as a separate risk from operational risk and is deemed to be a principal risk. This is based on the pervasive nature of Cyber Security & IT risk and the potential for substantial losses and reputational damage that could be caused by an IT failure. The Company's IT functions are largely outsourced to its ultimate parent, Scotiabank under a Service Level Agreement (SLA) which is monitored against key performance indicators monthly. IT risk is managed by first line staff with oversight by Risk Management locally and via the specialist second line resource shared across GBM Europe. IT risk is monitored by the first line against a range of indicators (e.g. system disruption and downtime) which, along with overall "RAG" status, are assessed and challenged by Risk Management.

Scotiabank and its subsidiaries are exposed to cyber security risks, which may include theft of assets, unauthorized access to sensitive information, or operational disruption due to breaches of cyber security. Scotiabank has implemented a robust and continuously evolving cyber security program to keep pace with evolving threats in which the Company participates. While computer systems continue to be subject to sophisticated cyber-attack attempts, Scotiabank's countermeasures in place remain effective. The Company, assisted by Scotiabank IT staff, and in particular supported by a shared Cyber Security resource for GBM Europe located in London, continues to actively monitor this risk, leveraging external threat intelligence, internal monitoring, reviewing best practices and implementing additional controls as required to mitigate these risks, while noting that the Company is a less likely target for cyber-crime, since it has no retail dimension. The Company's Risk Management function also benefits from second line specialist expertise and support in this area provided under an SLA by a Scotiabank resource located in London. While the risk is considered material to the Company, exposure to this risk is sufficiently mitigated by the capital held for operational risk.

8 Compliance Risk and Conduct Risk

Compliance Risk is the risk of an activity not being conducted in conformity with applicable laws, rules, regulations and prescribed practices (Regulatory Requirements), as well as compliance-related internal policies and procedures, and ethical standards expected by regulators, customers, investors, employees and other stakeholders. Compliance Risk includes Regulatory Compliance Risk, Conduct Risk, and Privacy Risk.

Within Scotiabank Conduct Risk is defined as 'an aggregation of risks arising from actions or behaviours of the Company's officers, directors, employees, or the conduct of the Company's business (directly or indirectly), not in conformity with the Company's values or principles for ethical conduct and which has, or has the potential to have, an adverse impact on the:

- Company;
- Company's customers or employees; or
- Integrity of the financial markets in which the Company operates

Compliance Risk and Conduct Risk are both deemed as principal risks to SIDAC.

Compliance risk arises throughout the Company with respect to on-going compliance with transactions, documentation and a wide range of prudential and conduct of business regulations, including regulatory reporting. This risk is heightened as a result of:

- Increased volume and complexity of new regulations and regulator expectations and changes to existing regulatory obligations (such as EBA Guidelines on Corporate Governance, joint ESMA and EBA Guidelines on Suitability of Management Body Members and Key Function Holders, CBI Guidance on Outsourcing, CRD V and CRR, Securities Financing Transactions Regulation ("SFTR"), EBA/CBI guidance on Remuneration, Volcker Rule, , Anti-Money Laundering, Fitness & Probity , Basel III, Recovery and Resolution Planning, and CBI Dear CEO Letters regarding Market Abuse and conduct risk Corporate Governance, Conduct Standards and expectations, etc.) and focus by regulators on non-financial risk such as conduct risk;
- High number of regulatory bodies and associations whose rules or guidance have application to the Company's activities; e.g. CBI, EBA, Basel, ESMA, Financial Action Task Force ("FATF"), Office of the Superintendent of Financial Institutions ("OSFI");
- Extra-territorial scope for international regulation e.g. Volcker, Foreign Account Tax Compliance Act ("FATCA"), EMIR, GDPR;
- Increased volume and complexity of reporting requirements to Regulators / key stakeholders and impact on existing systems; and
- Increased level of scrutiny, enquiry, inspection and regulatory enforcement by the CBI with an expectation that recommendations will be dealt with promptly; and
- Targeted CBI scrutiny of the management of impacts arising from major events such as Russia / Ukraine conflict and COVID-19.

While the risk is considered material to the Company, exposure to this risk is sufficiently mitigated by the capital held for operational risk.

8.1 Governance and Controls

The Board is ultimately responsible for overseeing the execution of the Company's Compliance Risk Summary Framework and Risk Culture and Conduct Risk Framework with local addenda. The Board approves a number of Frameworks and associated Policies supporting Regulatory Compliance and Conduct Risk.

The Director, Head of Compliance has a reporting line directly to the SIDAC Audit Committee and presents a report, inclusive of the Compliance Opinion on SIDAC's regulatory risk profile and assessment of the risk of infringement of compliance risk appetite as expressed in the Risk Appetite Framework.

The Compliance & Conduct Committee ("CCC") is the management committee responsible for the adequacy and effectiveness of regulatory risk management and control framework in SIDAC. This committee ensures that the risk of SIDAC being non-compliant with new or current legal and regulatory requirements is effectively managed and controlled.

The CCC is responsible for the adequacy and effectiveness of SIDAC's Conduct and Risk Culture risk management and controls framework and in the context of requirements as set out within the Scotiabank Risk Culture and Conduct Risk Framework, Policy and local addenda.

SIDAC have a Local Conduct Committee (a sub-committee of ROC) to oversee instances of staff mis-conduct risk where they occur and consider/ recommend any potential variable compensation impact to ROC. This Committee is separate to the CCC. Additionally, any breaches of Compliance policies are managed through the Scotiabank Consequence Management process, which ensures consistency of response across all Scotiabank locations.

Also, the Financial Crime Committee (FCC), which is a management committee, provides oversight of financial crime prevention activity in SIDAC, enables the business to communicate financial crime-related concerns and reviews current and emerging regulatory risks or trends related to financial crime.

9 Environmental and Climate Risk

In 2018, BNS announced its support for the Financial Stability Board (FSB) Task Force on Climate-related Financial Disclosures (“TCFD”).

The Company’s Board has recognised the significance of Environmental and Climate Risk, reclassifying it as a principal risk, and has directed management to take action to ensure adherence to the BNS group expectations, (see further details below), and the ECB Guidelines November 2020, resulting in the establishment of a project team and the articulation of a roadmap to compliance. The Board adopted the BNS Environmental Risk Management Framework with local addendum, approved a strategy with increased focus on Climate Risk and established a risk appetite metric, within its Risk Appetite Framework, in December 2021.

To enable effective oversight of the Company’s Environmental & Climate Risk Project Plan, key updates are reported to the Board Risk Committee quarterly meetings. The level of Board engagement and oversight will continue to develop in line with the delivery of the climate change related frameworks and methodologies.

Climate change requires a multidisciplinary approach. The risks and opportunities posed to the Company will ultimately be overseen by the Board and its Risk committee. Oversight practices will be developed to ensure due consideration of key risks affected by climate change. Existing practice includes reviewing and seeking Board approval for risk appetite limits and Environmental & Climate Risk related policy documents.

The BNS Climate Commitments are a comprehensive strategy to address climate risks and opportunities for customers, shareholders, employees, other stakeholders, and BNS’s business and operations. The strategy includes a pledge to mobilize CAD 100bn by 2025 to reduce the impacts of climate change, of which over CAD 58bn has been mobilized as of 2021. The commitments also include ensuring robust climate-related governance and transparency in reporting, integrating climate risk assessments into lending, financing and investing, decarbonizing the bank’s own operations, and establishing a Climate Change Centre of Excellence to inform and collaborate.

BNS has committed to establishing bank-wide, quantitative, time-bound targets for reducing greenhouse gas emissions associated with its underwriting and lending activities. As of October 2021, BNS has pledged to join the Net-Zero Banking Alliance (NZBA) as part of a global, industry-led initiative to accelerate and support efforts to address climate change.

The identification, assessment and management of environmental and climate-related risk is primarily managed through due diligence performed under environmental risk assessments and credit adjudication processes. 2021 progress includes:

- Adoption of the BNS Enterprise environmental risk management framework;
- Implementation of Company Environmental Risk Appetite Statement and associated metric;
- Integration of climate change risk assessment (CCRA) at sector and borrower-levels; and
- Knowledge building on climate change risk and scenario analysis.

Accountability for the management of this risk resides with the Business Lines, with oversight from the risk functions and the ORC and the CC. In addition to the RAF metric, which was arrived at by reference to the Environmental Risk Dashboard that considers a number of parameters, further metrics and reporting will be developed in 2022.

The Company also plans to continue to develop its disclosure requirements with regard to Article 449a of the CRR and the expected amendments to Commission Implementing Regulation (EU) 2021/637 laying out prudential disclosures on ESG risks. These will be developed in a manner that is proportionate to the Company’s size and complexity and the level of risk that it faces while also ensuring that the disclosures are transparent and comprehensible.

10 Liquidity and Funding Risk

10.1 Liquidity Risk Management Qualitative Disclosures (Article 451a(4))

Strategies and processes in the management of the liquidity risk

Liquidity risk is identified as a principal risk for SIDAC via its risk identification and assessment process, the outcome of which are recorded in SIDAC’s Risk Register. The Company’s Internal Liquidity Adequacy Assessment Process (ILAAP) and Liquidity and Funding Risk Management Framework & Policy set out in detail the strategy, risk measurement and management approaches employed to address this risk. By approving the ILAAP, the Board has satisfied itself as far as possible, that the Company will always have sufficient liquidity to meet its obligations when due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Company's reputation.

The liquidity strategy is designed to proactively manage the funding-liquidity risks inherent to the Company's balance sheet, ensuring that the bank meets all financial obligations, satisfies regulatory requirements, while seeking to manage liquidity costs in the most efficient manner. The strategy also aims to minimise the possibility and impact of liquidity stress events.

Its main objectives are to:

- Ensure liquidity strategy is consistent with the Company's Risk Appetite and the Business Plan objectives.
- Support business line growth.
- Structure the liquidity profile using methods that balance risk and performance to ensure a resilient liquidity and funding profile.
- Identify available liquidity resources and quantify the related risk/returns.
- Perform ongoing due diligence and risk assessment of liquidity assets.
- Consider the direct or indirect impacts of climate related and environmental risks
- Maintain confidence of counterparties and funding providers.
- Ensure that disciplined liquidity management processes are embedded in Treasury's risk culture.
- Identify contingency sources of funding.

Structure and organisation of the liquidity risk management function

The Liquidity and Funding Risk Management Framework & Policy which is a component of the Risk Management Framework is predicated on the three-lines of defence model.

The Company's Treasury function, which is a first line of defence function, under the direction of the ALCO is responsible for managing the Company's liquidity risk. Treasury is responsible for ensuring compliance with policies, frameworks and procedures as well as ensuring legal and regulatory compliance. The Risk Management function, a second line of defence function oversees the implementation of the Liquidity and Funding Risk Management Framework & Policy, providing review and challenge of liquidity and funding risks. Risk Management measures, monitors and reports Liquidity and Funding risk to senior management as well as the BRC.

The ALCO is the committee responsible for the strategic direction for liquidity and funding risk management. It has oversight and monitoring responsibilities with respect to liquidity and funding risk, approving ALCO limits and the methodologies used for measuring and managing liquidity risk. It also reviews and challenges the policies, frameworks, strategies and plans with respect to the management of funding and liquidity risk, and consents to their onward submission to the ExCo and/or BRC as appropriate. It also seeks advice and counsel from Scotiabank GRM as appropriate. The Liquidity and Funding Risk Management Framework & Policy receives approval from the Board who also approve liquidity RAF limits.

The degree of centralisation of liquidity management and interaction between the group's units

The Company maintains its Liquidity and Funding Risk Management policies in accordance with regulatory requirements and ensuring alignment with BNS policies. The Head of Treasury will document SIDAC's Liquidity strategy in consultation with BNS Group Treasury in line with the Company's Liquidity Risk Appetite. The Company's liquidity management also takes into consideration BNS' centralised global liquidity management approach under the strategic direction and oversight provided by BNS Group Treasury.

Scope and nature of liquidity risk reporting and measurement systems

Liquidity risk is measured and controlled through the establishment of quantifiable metrics outlined in the Company's Risk Appetite Framework, namely LCR, NSFR and FX funding metrics. This is supplemented by a suite of internal liquidity limits including Minimum Liquidity Buffers, Liquidity Stress Surplus, Intraday Liquidity monitoring, Liquidity Stress Tests, Cash flow gaps, and single currency LCR and NSFR metrics, all of which are reported daily to management, monthly to the ALCO and quarterly to the BRC.

Forecasting of key liquidity metrics plays a key role in evaluating the potential future liquidity risk at SIDAC with the view to implementing any remediation action required in order to ensure adherence to limits.

Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants

The Company's Treasury function, under the direction of the ALCO is responsible for managing the Company's liquidity risk. The primary sources of the Company's funding are deposits from Scotiabank and Scotiabank affiliates. Treasury also executes foreign exchange swaps with Scotiabank and third parties to fund its non-USD positions. The Company's pool of bonds, in various currencies, enables it to raise funds through wholesale banking repo markets, the ECB and other national central banks via affiliates. In addition, the Company has a US$1bn multi- currency committed funding facility from Scotiabank. The Company also complies with regulatory liquidity management requirements set by the Central Bank of Ireland, including the maintenance of a diversified liquidity buffer calibrated against liquidity stress scenarios as required by the EBA.

An outline of the Company's contingency funding plans

Contingency funding planning is an integral component of the ILAAP and provides a framework for determining appropriate actions in the event of a liquidity crisis event. The Contingency Funding Plan (CFP) identifies management actions which could be taken in a stressed scenario. Liquidity Stress Indicators (LSIs) have been established as the basis upon which an evaluation of liquidity stress can be made. LSIs are monitored and reported daily providing an early warning of any potential liquidity issues. A Contingency Funding Plan document describes the governance process, key roles and responsibilities and the communication process for the CFP as well as the key stages of the CFP. It is reviewed and approved annually by the Company's Board of Directors.

An explanation of how stress testing is used

The Company's Liquidity Stress Testing (LST) Framework governs its Liquidity Stress Testing program. The LST program is established to ensure that the Company maintains a sufficient liquidity buffer to mitigate liquidity shortfalls from stress events, such as those defined by the scenarios outlined within the Framework. The LST program defines a range of liquidity stress scenarios that could be encountered and includes idiosyncratic, market wide and combination scenarios, types of stress tests undertaken, their frequency, methodological details, appropriate assumptions, and relevant data infrastructure.

The stress assumptions from the LST also inform and are applied to SIDAC's Funding Plan, i.e., informs the 'normative perspective', comprising funding stress scenarios over the medium term (out to three years) taking in to account the impact on LCR and NSFR regulatory ratios.

With regard to the solvency of the Company, a Reverse Stress Test is also completed on a qualitative basis through discussion at the ALCO and reported to the BRC. Consideration is given to outcomes resulting in both the insolvency and the un-viability of the Company.

A declaration approved by the management body on the adequacy of liquidity risk management arrangements

Through the ILAAP process conducted on at least an annual basis, the Company's Board attests to the adequacy of the Company's liquidity and funding position and risk management processes on an annual basis. The ILAAP provides a holistic view of the Company's liquidity adequacy. It examines both the short- and long-term liquidity position relative to all internal and regulatory limits and includes forward looking analysis of the entity's liquidity assessment.

Risk Appetite Statement for Liquidity and Funding Risk

The Company's Risk Appetite Framework (RAF) governs the risk activities undertaken by the entity and articulates the level of risk the Board is willing to assume in the pursuit of its strategy and financial objectives. The RAF uses the output from the risk identification and assessment process, ILAAP, ICAAP, and Recovery Plan to determine what risks require measurement, the appropriate metrics that enable the monitoring of those risks and the calibration of the metrics' thresholds to allow for prompt and appropriate decision making.

The Company maintains a clearly defined RAF which consists of the identification of:

- Risk Capacity: The maximum level of risk which can assume before breaching key constraints;

- Risk Appetite: The level and types of risk is willing to assume within its risk capacity to achieve its strategic objectives; and
- Key Risk Appetite Measures: Quantitative and qualitative metrics that capture SIDAC's Risk Appetite.

Together, the application of these components helps to ensure the Company stays within appropriate risk boundaries. The RAF is reviewed annually by senior management who recommend it to the Board for approval, via the BRC. SIDAC actively communicates its risk appetite throughout the entity to further promote a sound risk culture.

The appetite for liquidity risk is expressed by way of a number of metrics, namely;

- LCR,
- NSFR,
- FX Funding limits,
- Intraday Liquidity Risk.

From a Liquidity Risk perspective, the Company's risk appetite ensures that:

- SIDAC maintains sufficient liquidity to meet all liquidity measurement standards and minimum liquidity requirements established by local regulators.
- Appropriate levels of unencumbered high-quality liquid assets are held that can be readily sold or pledged.
- Positive cumulative liquidity gap positions are maintained over specified time horizons.
- Diversification of funding by term is actively managed.
- FX exposures are managed efficiently while minimising foreign exchange re-financing risk.
- SIDAC has adequate intraday liquidity sources to cover intraday outflows even during times of stress.

10.2 Additional Qualitative Information on LCR (Article 451a(2))

The below items provide additional qualitative information on LCR, which complements template EU LIQ1.

Explanations on the actual concentration of funding sources

The Company's primary sources of unsecured funding are via Scotiabank's Group Treasury and affiliates. This practice creates a Concentration risk, as SIDAC has few external depositors. This is monitored by Risk Management on a quarterly basis and is reported to ALCO and the BRC.

SIDAC has identified contingent sources of funding through which it can access alternative funding. Treasury undertake regular testing of repo markets to ensure continued access to repo markets and that bond haircuts can be also tested. It evaluates its ability to withstand crisis situations through the execution of its LST framework.

Funding concentration with respect to term is also assessed and measured against RAF metrics including the LCR and the NSFR. Maintaining single currency LCR and NSFR metrics further assists in ensuring diversity.

Derivative exposures and potential collateral calls

SIDAC enters into CSAs with its external counterparties with whom derivatives will be transacted to further mitigate counterparty credit risk of derivative positions. In addition, SIDAC have also established a CSA with its parent. CSA terms include thresholds, minimum transfer amounts, eligible securities and currencies, haircuts applicable to eligible securities and rules for the settlement of disputes. Pledging of collateral is subject to ALCO approved limits.

In addition to the LCR, SIDAC measures and monitors this risk type through the application of stress tests and scenario analysis. SIDAC is leveraging the Bank's collateral stress testing process, run at least monthly, the results of which determine additional collateral requirements which are applied to SIDAC's LST as a day 1 outflow across all scenarios, and are monitored daily.

The Company also monitor collateral levels through the regulatory Asset Encumbrance Ratio which is monitoring against a pre-approved ALCO limit as part of the overall liquidity risk limit framework.

Within the LCR calculation itself, in order to determine outflows related to potential collateral calls, the Company uses the Historic Look Back Approach ("HLBA") which uses the largest collateral movement on an absolute basis over any 30 day period over the previous two years. This amount is included within the LCR as an outflow and reported on row 11 of template EU LIQ1 on the following page.

Currency mismatch in the LCR

Liquidity risk is managed in SIDAC on a material currency basis. From a CRR perspective, USD has been primarily the only significant currency for SIDAC historically for regulatory reporting purposes, however SIDAC's methodology also classifies GBP and EUR as material currencies. The Company is cognisant that its sources of funding are not diversified, and concentration risk is generated as a result of its dependence on FX swap instruments transacted with Group entities. This risk is mitigated by imposing a RAF limit on the percentage amount of funding that can be conducted via FX, by holding a large portfolio of liquid assets and other unencumbered assets in various currencies, as well as by managing the maturity mismatch by ensuring diversification of the funding maturity profile.

Furthermore, SIDAC monitor both the LCR and NSFR internally against pre-defined limits for all material currencies. In addition, ALCO has established intraday risk limits for each material currency and maintains 30-day cumulative FX funding gap limits with respect to EUR and GBP.

Explanations on the changes in the LCR over time, the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time

Template EU LIQ1 on the following page provides details of the Company's LCR calculation. All figures included in the table represent a 12-month rolling average per data point for each quarter of 2021, as per the requirements. The quarterly 12 month rolling average LCR ranged from 305% to 313% in 2021. The ranges of the quarterly averages of the key inputs to the LCR during 2021 were:

- HQLA: US$ 1,759mm to US$ 1,837mm.
- Outflows (weighted): US$ 828mm to US$ 1,029mm.
- Inflows (weighted): US$ 242mm to US$ 459mm.

Although there was more significant variance in both inflows and outflows, net cash outflows were more stable and decreased only slightly, in line with the decrease in HQLA. Hence the LCR was stable within in the narrow range above.

High-level description of the composition of the institution`s liquidity buffer.

The Company's buffer of HQLA is predominantly comprised of level 1 assets in the form of bonds issued by Sovereigns, Supranational and Agencies ("SSA"s) and cash held at the CBI along with a smaller proportion of level 2A in the form of covered bonds and corporates.

Net Stable Funding Ratio

The subsequent template, EU LIQ2, provides the required information on the calculation of Company's net stable funding ratio. Although the requirement of Article 451a(3)(a) is that institutions disclose quarter-end figures of their net stable funding ratio for each quarter of the relevant disclosure period, the NSFR ratio only became a regulatory binding requirement from 28 June 2021. Therefore quarterly figures are disclosed for 31 October 2021 and 31 July 2021 only.

Table 35 – EU LIQ1 – Liquidity Coverage Ratio (LCR) disclosure template (Article 451a (2))

US$'000		Total unweighted value (average)				Total weighted value (average)			
EU 1a	**Quarter ending on**	**31 Oct '21**	**31 Jul '21**	**30 Apr '21**	**31 Jan '21**	**31 Oct '21**	**31 Jul '21**	**30 Apr '21**	**31 Jan '21**
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					1,759,116	1,791,536	1,817,299	1,836,749
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	-	-	-	-	-	-	-	-
3	*Stable deposits*	-	-	-	-	-	-	-	-
4	*Less stable deposits*	-	-	-	-	-	-	-	-
5	Unsecured wholesale funding	441,487	414,533	378,425	366,633	441,487	414,533	378,425	366,633
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	-	-	-	-	-	-	-	-
7	*Non-operational deposits (all counterparties)*	101,172	115,767	127,598	133,290	101,172	115,767	127,598	133,290
8	*Unsecured debt*	340,315	298,766	250,827	233,343	340,315	298,766	250,827	233,343
9	*Secured wholesale funding*					-	-	572	572
10	Additional requirements	2,240,940	2,064,838	1,878,628	1,770,920	582,015	556,081	504,898	454,227
11	*Outflows related to derivative exposures and other collateral requirements*	12,360	16,804	19,299	14,863	12,360	16,804	19,299	14,863
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	2,228,580	2,048,033	1,859,329	1,756,057	569,655	539,277	485,599	439,364
14	Other contractual funding obligations	8,385	7,993	9,402	9,200	5,912	5,608	7,039	6,870
15	Other contingent funding obligations	-	-	-	-	-	-	-	-
16	**TOTAL CASH OUTFLOWS**					1,029,415	976,222	890,934	828,303
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	420,076	365,561	279,262	213,545	419,510	364,799	278,589	213,216
19	Other cash inflows	43,823	35,189	26,070	32,897	39,656	31,023	21,904	28,731
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)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	**TOTAL CASH INFLOWS**	463,899	400,750	305,332	246,443	459,166	395,821	300,493	241,947
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows Subject to 90% Cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows Subject to 75% Cap*	463,899	400,750	305,332	246,443	459,166	395,821	300,493	241,947
TOTAL ADJUSTED VALUE									
EU-21	**LIQUIDITY BUFFER**					1,759,116	1,791,536	1,817,299	1,851,970
22	**TOTAL NET CASH OUTFLOWS**					595,010	602,456	611,758	608,011
23	**LIQUIDITY COVERAGE RATIO (%)**					304.79%	306.32%	305.65%	313.17%

There are no other items in the LCR calculation that are not captured in the LCR disclosure template but that the Company considers relevant for its liquidity profile.

Table 36 – EU LIQ2 – Net Stable Funding Ratio (Art 451a (3))

31 Oct 2021

US$'000		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	**Capital items and instruments**	**-**	**-**	**-**	**1,726,535**	**1,726,535**
2	*Own funds*	-	-	-	1,726,535	1,726,535
3	*Other capital instruments*		-	-	-	-
4	**Retail deposits**		-	-	-	-
5	*Stable deposits*		-	-	-	-
6	*Less stable deposits*		-	-	-	-
7	**Wholesale funding:**		**1,685,342**	**168**	**29,113**	**29,196**
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		1,685,342	168	29,113	29,196
10	**Interdependent liabilities**		**-**	**-**	**-**	**-**
11	**Other liabilities:**	**-**	**26,388**	**702**	**6,764**	**7,115**
12	*NSFR derivative liabilities*	-				
13	*All other liabilities and capital instruments not included in the above categories*		26,388	702	6,764	**7,115**
14	**Total available stable funding (ASF)**					**1,762,847**
Required stable funding (RSF) Items						
15	**Total high-quality liquid assets (HQLA)**					**106,517**
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**		**-**	**-**	**-**	**-**
17	**Performing loans and securities:**		**89,195**	**152,921**	**841,871**	**840,612**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		233	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		85,374	119,086	254,864	322,944
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		1,682	33,835	542,026	478,481
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*		1,906	-	44,981	39,187
25	**Interdependent assets**		-	-	-	-
26	**Other assets:**		**422,761**	**808**	**23,318**	**30,147**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	-	-
29	*NSFR derivative assets*		3,951			3,951
30	*NSFR derivative liabilities before deduction of variation margin posted*		8,409			421
31	*All other assets not included in the above categories*		410,401	808	23,318	25,775
32	**Off-balance sheet items**		**278,086**	**227,496**	**2,630,944**	**157,961**
33	**Total RSF**					**1,135,237**
34	**Net Stable Funding Ratio (%)**					**155.28%**

31 Jul 2021

US$'000		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	**Capital items and instruments**	**-**	**-**	**-**	**1,725,392**	**1,725,392**
2	*Own funds*	-	-	-	1,725,392	1,725,392
3	*Other capital instruments*		-	-	-	-
4	**Retail deposits**		-	-	-	-
5	*Stable deposits*		-	-	-	-
6	*Less stable deposits*		-	-	-	-
7	**Wholesale funding:**		**1,693,691**	**85,801**	**-**	**42,901**
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		1,693,691	85,801	-	42,901
10	**Interdependent liabilities**		-	-	-	-
11	**Other liabilities:**	**-**	**21,858**	**995**	**6,830**	**7,328**
12	*NSFR derivative liabilities*	-				
13	*All other liabilities and capital instruments not included in the above categories*		21,858	995	6,830	7,328
14	**Total available stable funding (ASF)**					**1,775,621**
Required stable funding (RSF) Items						
15	**Total high-quality liquid assets (HQLA)**					**84,092**
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**		-	-	-	-
17	**Performing loans and securities:**		**145,306**	**195,822**	**872,488**	**931,665**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		65,939	168,955	305,750	396,822
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		51,267	26,867	522,123	482,871
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*		28,100	-	44,615	51,972
25	**Interdependent assets**		-	-	-	-
26	**Other assets:**		**442,603**	**1,196**	**22,094**	**30,200**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	-	-
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		2,128			106
31	*All other assets not included in the above categories*		440,475	1,196	22,094	30,094
32	**Off-balance sheet items**		**263,420**	**119,883**	**2,419,287**	**140,477**
33	**Total RSF**					**1,186,434**
34	**Net Stable Funding Ratio (%)**					**149.66%**

11 Concentration Risk

Concentration risk is the risk associated with any single exposure (or group of exposures that may perform similarly because of a common characteristic or common sensitivity to economic, financial, or business developments) that has the potential to cause considerable risk to earnings and capital. Concentration risk may arise as a result of correlated positions that present exposure to multiple risk factors. Credit concentration risk includes concentrations to the same counterparties or groups of connected counterparties, and counterparties in the same industry sector, geographical region or concentrations from the same activity.

11.1 Concentration Risk Management and Risk Measures

As noted in section 4, the Board has approved a Concentration Risk Management Framework and Policy which sets out types of concentration risk and the levels at which concentrations are regarded as material or significant. Oversight of the Company’s management of Concentration risk also includes ALCO, ExCo and Board review and approval of policies and limits relating to credit, market, liquidity, and operational risk as well as quarterly reporting to the BRC on risk concentrations relating to these key risk disciplines, if applicable, and stress testing on sectors where a material concentration is deemed to arise. Specific Board approved limits are set to control the maximum exposure to any counterparty or group of related counterparties. Coupled with this, the regulatory Large Exposure rules must be observed. Industry and country concentration is monitored on a regular basis for internal and regulatory purposes. Overall industry and country exposures are reviewed by the CC on a regular basis.

Credit concentration risk, considered a subset of credit risk, is primarily monitored and controlled by the Company under three categories: exposure to an entity or group of connected entities; exposure by industry; and exposure by geography. A measure of Credit concentration risk for use in the Company’s internal capital calculation is computed on a quarterly basis using the Moody's RiskFrontier model. Using the model, the deviation of the internal capital charge for SIDAC’s credit portfolio from that of a well-diversified credit portfolio is assessed by comparing it to SIDAC’s portion of internal capital charge for the consolidated Scotiabank business banking credit portfolio. The difference between the two calculations can be viewed as the diversification benefit that the non-SIDAC exposures in the consolidated Scotiabank portfolio would provide to reduce the amount of capital otherwise attributable to the SIDAC exposures.

11.2 Concentration Risk Mitigation

As per its Risk Appetite Framework, the Company seeks to avoid excessive risk concentrations through a diversified mix of businesses, products, geographies, currencies and customers. Appropriate management of concentration risk is also ensured by the Company’s limits, policies and procedures. Other credit risk mitigation techniques include reviewing risks associated with large indirect credit exposures.

12 Securitisations (Article 449)

Securitisations activities and approach to calculating risk weighted exposure amounts (Article 449(a),(c),(h))

The Company acts purely as investor in securitisations and does not act as originator or sponsor for any securitisation activity. The same overall financial objective applies to any securitisation investments, which is to generate a satisfactory return for the risk being taken.

Since 2019 a new framework for European securitisations has been in place which consolidates legislation governing European securitisations, and introduces rules for issuing simple, transparent and standardised (“STS”) transactions. The Company uses the same nominated ECAIs as above for risk weighting securitisations: S&P and Moody’s. At 31 October 2021, the Company held two traditional securitisation positions. One of the positions comprises Class A notes of an asset backed securitisation vehicle which are risk weighted at 20%. In 2020, prior to Brexit, this position qualified for a reduced risk weight of 10% under the External Ratings Based Approach (SEC-ERBA) but now no longer qualifies as an STS transaction and so reverts to a RW of 20%. The other is a capital note subordinated to other obligations in a larger Asset Backed Commercial Paper conduit. No new transactions were entered into during the year.

Accounting treatment (Article 449(g))

At inception, exposures to securitisations in the form of debt instruments are classified into one of the following measurement categories: Amortised cost; Fair value through other comprehensive income (FVOCI); or Fair value through profit or loss (FVTPL) for trading related assets and financial instruments mandatorily or optionally designated as such.

Classification of debt instruments is determined based on: the business model under which the assets are held; and the contractual cash flow characteristics of the instrument.

The Class A notes continue to be measured at their amortised cost using the effective interest method, with their impairment calculated using the expected credit loss (ECL) approach.

The capital note is classified within Investment securities mandatorily measured at FVTPL (as its cash flows do not represent payments that are solely payments of principal and interest – "SPPI") and is measured at fair value in the balance sheet with realised and unrealised gains and losses recognised in the Profit and Loss account as part of net trading income or net gain/loss from other financial instruments carried at fair value. This position is classified as Level 3 as it does not trade in an active market. It is fair valued based on an internally developed model that requires the use of significant unobservable inputs, involving greater management judgment for valuation purposes. The unobservable inputs used in the valuation primarily include assumptions on the level of cash flows and discount rates. These assumptions are reviewed on an ongoing basis by management.

Monitoring of risks (Article 449(b))

In relation to the capital note position the Company conducts an annual valuation review which incorporates changes in the expected average life, cash flows received and projected, and discount rate to use. The ALCO approve this review. Outside of the formal annual revaluation model review, SIDAC Corporate Banking and Risk Management personnel liaise with the Securitisation Team at Scotiabank USA on a quarterly basis, or more frequently if required. Various factors are considered such as liquidity, pricing, term of the commercial paper issuances, delinquencies, pool amounts, fees and the external economic environment. If any factors are deemed to have a material impact on the pricing assumptions a recommendation to update the valuation can take place outside of the formal annual review process.

In relation to the Class A notes, these are the Senior ranking notes with only net swap payments ranking ahead of principal and interest on the notes. The Company performs monitoring and analysis of the transactions based on the investor report provided by the borrower on a monthly basis. This includes an analysis of delinquency ratios, retention and return rates and the level of overcollateralization. A formal stress test in calculated annually by Risk Management to assess if the class A notes held pay out under stressed conditions and results are presented to ALCO for review and approval.

Credit risk

The securitisations are subject to a credit risk capital charge under the Standardised Approach of US$ 51.5mm as at 31 October 2021 (2020: US$ 48.9mm). Using Moody's ratings, the Class A notes position now attract a risk-weighting of 20% as noted above. As a result of being unrated, the capital note is risk-weighted at 1250%. The Company does not avail of available techniques of hedging or unfunded protection to mitigate the exposures to securitisations.

Other risks

There are a number of possible inherent risks in purchasing certain securitised notes including: the performance of the underlying assets; the explicit support of the Issuer and its financial stability; volatility in the market value of securitised notes; and liquidity risk that the SPV issuing the purchased securitisation notes has insufficient income from the underlying assets to meet its obligations. The Company is not subject to these risks in a material way which would require additional regulatory capital beyond what has been provided under the Standardised Approach.

Quantitative disclosures regarding securitisations

The templates on the following page are new requirements this year under the revised disclosures implementing regulation. Template EU SEC1 provides a breakdown of the Company's securitisation exposures by activity, type and underlying assets. Template EU SEC4 provides the detail of the regulatory capital calculations by risk weight and regulatory approach.

Table 37 – EU SEC1 - Securitisation exposures in the non-trading book (Article 449(j))

31 Oct 2021		Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
		Traditional				Synthetic		Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
		STS		Non-STS												
US$'000			of which SRT		of which SRT		of which SRT		STS	Non-STS			STS	Non-STS		
1	**Total exposures**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**356,681**	**-**	**356,681**
2	**Retail (total)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**310,164**	**-**	**310,164**
3	residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	310,164	-	310,164
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	**Wholesale (total)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**46,517**		**46,517**
8	loans to corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	46,517	-	46,517
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Table 38 – EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor (Article 449(k))

31 Oct 2021		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
US$'000		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
1	**Total exposures**	**310,164**	**-**	**-**	**-**	**46,517**	**-**	**310,164**	**46,517**	**-**	**-**	**62,033**	**581,460**	**-**	**-**	**4,963**	**46,517**	**-**
2	Traditional securitisation	310,164	-	-	-	46,517	-	310,164	46,517	-	-	62,033	581,460	-	-	4,963	46,517	-
3	Securitisation	310,164	-	-	-	46,517	-	310,164	46,517	-	-	62,033	581,460	-	-	4,963	46,517	-
4	Retail underlying	310,164	-	-	-	-	-	310,164	-	-	-	62,033	-	-	-	4,963	-	
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	46,517	-	-	46,517	-	-	-	581,460	-	-	-	46,517	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

13 Asset Encumbrance (Article 443)

An asset is considered encumbered if it has been pledged or if it is subject to any form of arrangement to secure, collateralise or credit enhance any transaction from which it cannot be freely withdrawn.

As required, the asset encumbrance disclosure templates, shown on the following three pages, show reported amounts as median values based on quarter end point in time over the year to 31 October 2021.

Table 39 – EU AE1 – Encumbered and unencumbered assets

	31 Oct 2021	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 EHQLA and HQLA		of which EHQLA and HQLA
	US$'000	010	030	040	050	060	080	090	100
010	**Assets of the disclosing institution**	24,831	24,831			3,744,659	1,558,113		
030	Equity instruments	-	-	-	-	1,403	-	1,403	-
040	Debt securities	24,831	24,831	24,831	24,831	2,215,912	1,558,113	2,215,912	1,558,113
050	of which: covered bonds	24,831	24,831	24,831	24,831	40,299	40,299	40,299	40,299
060	of which: securitisations	-	-	-	-	46,623	-	46,623	-
070	of which: issued by general governments	-	-	-	-	1,072,425	915,969	1,072,425	915,969
080	of which: issued by financial corporations	-	-	-	-	869,149	712,379	869,149	712,379
090	of which: issued by non-financial corporations	-	-	-	-	94,960	94,960	94,960	94,960
120	Other assets	-	-			1,499,460	-		

	31 Oct 2020	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 EHQLA and HQLA		of which EHQLA and HQLA
	US$'000	010	030	040	050	060	080	090	100
010	**Assets of the disclosing institution**	12,808	11,288			4,220,925	1,962,864		
030	Equity instruments	-	-	-	-	11,120	-	11,120	-
040	Debt securities	11,288	11,288	11,288	11,2888	2,423,157	1,962,864	2,423,157	1,962,864
050	of which: covered bonds	-	-	-	-	29,312	29,312	29,312	29,312
060	of which: securitisations	-	-	-	-	46,438	-	46,438	-
070	of which: issued by general governments	-	-	-	-	989,246	989,246	989,246	989,246
080	of which: issued by financial corporations	-	-	-	-	1,211,463	682,486	1,211,463	682,486
090	of which: issued by non-financial corporations	11,288	11,288	11,288	11,288	307,861	307,861	307,861	307,861
120	Other assets	1,520	-			1,845,166	-		

Table 40 – EU AE2 – Collateral received and own debt securities issued

	31 Oct 2021	Fair value of encumbered collateral received or own debt securities issued		Unencumbered: Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
	US$'000	010	030	040	060
130	**Collateral received by the disclosing institution**			49,561	49,561
140	Loans on demand				
150	Equity instruments				
160	Debt securities				
170	of which: covered bonds				
180	of which: securitisations				
190	of which: issued by general governments			49,561	49,561
200	of which: issued by financial corporations				
210	of which: issued by non-financial corporations				
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	**Own debt securities issued other than own covered bonds or securitisations**				
241	**Own covered bonds and securitisations issued and not yet pledged**				
250	**TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED**	24,831	24,831		

	31 Oct 2020	Fair value of encumbered collateral received or own debt securities issued		Unencumbered: Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
	US$'000	010	030	040	060
130	**Collateral received by the disclosing institution**	-	-	**150,596**	**150,596**
140	Loans on demand	-	-	-	-
150	Equity instruments	-	-	-	-
160	Debt securities	-	-	-	-
170	of which: covered bonds	-	-	-	-
180	of which: securitisations	-	-	-	-
190	of which: issued by general governments	-	-	150,596	150,596
200	of which: issued by financial corporations	-	-	-	-
210	of which: issued by non-financial corporations	-	-	-	-
220	Loans and advances other than loans on demand	-	-	-	-
230	Other collateral received	-	-	-	-
240	**Own debt securities issued other than own covered bonds or securitisations**	-	-	-	-
241	**Own covered bonds and securitisations issued and not yet pledged**			-	-
250	**TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED**	**12,808**	11,288		

Table 41 – EU AE3 – Sources of encumbrance

	31 Oct 2021	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	US$'000	010	030
010	**Carrying amount of selected financial liabilities**	25,000	24,831

	31 Oct 2020	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	US$'000	010	030
010	**Carrying amount of selected financial liabilities**	12,580	12,808

As an integral aspect of its business, the Company engages in activities that result in certain assets being encumbered. The majority of encumbrance arises from its repo and reverse repo transactions. Other sources of encumbrance are collateral pledged under CSA agreements.

The Company primarily adopts standard collateral agreements and collateralises based on industry standard contractual agreements (mostly CSA, ISDA, and GMRA).

14 Remuneration

All SIDAC employees participate in a compensation structure and programmes that apply to BNS employees globally. The SIDAC Board and the BNS Human Capital and Compensation Committee of the Board ("BNS HCOB") work together to fulfil the oversight responsibilities contained in their respective mandates outlined below. The SIDAC Board reviews and adopts the BNS Compensation Policy on an annual basis with any differing local practices reflected in a SIDAC Board-approved Addendum to this policy. The most recent adoption of the BNS Compensation Policy and approval of the SIDAC Addendum was in May 2021.

This section outlines SIDAC's approach to remuneration and provides information on the Company's compliance with remuneration-related regulatory requirements. The remuneration requirements include those of the CBI for firms identified by the CBI as less significant institutions and the EBA including the EBA Guidelines on Sound Remuneration Policies, CRD transposed into Irish law as Statutory Instruments No. 158 and 159 of 2014, both as amended, Statutory Instrument No. 375 of 2017 European Union (Markets In Financial Instruments) Regulations and the EBA's Regulatory Technical Standards.

14.1 Qualitative Disclosure

14.1.1 Governance

Role of SIDAC Board

The SIDAC Board is responsible for oversight of SIDAC's remuneration policy and local regulatory processes, within the overarching framework of the BNS Compensation Policy, the BNS Clawback Policy, as well as SIDAC's Addendum to both policies and the Global Banking and Markets Incentive Plan ('GBMIP') deferred compensation guidelines. SIDAC's remuneration policy sets out a pay-for-performance philosophy that supports the organization's strategic focus, encourages strong corporate performance and helps SIDAC and BNS create and sustain shareholder value over the long term. Among other things, the remuneration policy outlines SIDAC's and BNS' approach to compensation risk oversight in incentive plan design and funding. It outlines the minimum deferral rates for senior executives and individuals whose roles may have a material impact on the risk profile of the business, including roles in control and support functions.

The SIDAC Board is ultimately responsible for ensuring that SIDAC has in place remuneration policies and practices that are consistent with sound and effective risk management and do not promote excessive risk-taking. The SIDAC Board monitors remuneration adequacy, effectiveness and related governance and is responsible for overseeing the implementation of and ensuring compliance with SIDAC's remuneration practices in accordance with applicable remuneration-related regulatory requirements and SIDAC's remuneration policy.

SIDAC does not use variable remuneration vehicles or methods that facilitate avoidance of the *EBA Guidelines on Sound Remuneration Policies*.

Additionally, the SIDAC Board is responsible for:

- Approving the remuneration for executive-level employees[2] as well as other identified Material Risk Takers ("MRTs");
- Reviewing SIDAC's Pillar 3 remuneration section disclosures in advance of publication;
- Approving SIDAC's remuneration policy and overseeing that policies, practices and processes are in compliance with such policy; Assessing the achievement of performance targets and the need for any ex-post risk adjustments;
- Reviewing remuneration decisions in the context of SIDAC's risk appetite;

[2] Executive-level employees for the purposes of MRT identification are members of the SIDAC Executive Committee (voting members).

- Overseeing that appropriate compensation frameworks are in place, which may include the adoption of new incentive plans or material changes to existing plans, in accordance with the compensation programmes and policies of the parent company, BNS; and
- Overseeing SIDAC's control functions, having regard to their effectiveness.

The SIDAC Board reviews pertinent matters that are discussed with, or decisions made by, the BNS HCOB which are relevant to SIDAC, and provides local oversight, review and input on remuneration matters, where appropriate. The SIDAC Board interacts with the BNS HCOB as required.

The SIDAC Board met 9 times during fiscal 2021, of which 4 of the meetings included discussion of remuneration matters. Composition of the SIDAC Board is as referenced in section 3.1.2 of this document.

The SIDAC Board is supported in executing its remuneration mandate by SIDAC's Remuneration Oversight Committee ('ROC', a management committee of SIDAC). The primary objective of the ROC is to provide oversight and guidance on remuneration-related matters and to implement BNS human resources and compensation policies and procedures as applicable to SIDAC. The ROC has reporting responsibility to the SIDAC Board and the BNS Compensation Review Committee ("BNS CRC", a management committee of BNS) for remuneration-related matters. Specifically, the ROC's remuneration responsibilities include:

- Ensuring all employee incentive plans approved on behalf of SIDAC are in compliance with applicable legislation, regulations and regulatory guidelines, including, but not limited to, the remuneration requirements of the CRD and related EBA Guidelines and Material Risk Taker ('MRT') Regulatory Technical Standards / Regulations;
- Reviewing memoranda from Heads of Compliance, Risk and Finance, ahead of provision to the SIDAC Board and the BNS HCOB prior to their approval of incentive payments, as well as all remuneration-related regulatory disclosures, including the Pillar 3 (remuneration section) and the High Earners Report that are also submitted to the SIDAC Board and BNS HCOB for approval;
- Annually approving the MRT Identification Procedures, SIDAC MRTs and the MRT exemptions and waiver recommendations submitted to the SIDAC Board and BNS HCOB for approval;
- Annually reviewing and implementing remuneration-related regulatory changes
- A SIDAC sub-committee of the ROC, referred to as the Local Conduct Committee (LCC), reviews and approves any risk and conduct breach incidents quarterly, and recommends ex-ante and/or ex-post adjustments to individual incentive awards for MRTs and other SIDAC employees involved in a material risk or misconduct incident to the BNS CRC for approval by the SIDAC Board;
- Ratifying qualifying bonus percentage as part of SIDAC'S Approved Profit-Sharing Scheme ("APSS") program; and
- Reviewing the compensation principles and programmes of BNS as applicable to SIDAC.

Role of The Bank of Nova Scotia Human Capital and Compensation Committee

BNS has an established Human Capital and Compensation Committee of its Board of Directors (the "Parent Board"), which is responsible for setting global policies for BNS on compensation, overseeing the compensation governance framework and ensuring that compensation arrangements are consistent with and promote effective risk management. The BNS HCOB assumes decision-making responsibilities relating to compensation and annual disclosure and related reviews and recommends to the Parent Board for approval the content and effectiveness of the BNS Compensation Policy, as informed by corporate human resources and independent advisors, and ensures that they align with BNS' strategic objectives. Additionally, the BNS HCOB annually approves the list of SIDAC MRTs and their remuneration.

At an Enterprise level, the BNS HCOB is responsible for:

- Compensation philosophy and human resources policies and practices – oversees alignment with BNS' pay-for-performance strategy and risk appetite;
- Compensation programmes – oversees material compensation programmes and incentive plans and makes recommendations to the Parent Board with respect to these programmes. Reviews and approves compensation disclosures and / or recommends to the Parent Board for approval prior to publication;
- Compensation governance – reviews evolving governance practices and the alignment of compensation policies with best practices including the remuneration-related requirements of the Financial Stability Board ("FSB"), CBI, EBA and proxy voting guidelines of shareholder advisory firms such as Institutional Shareholder Services ("ISS") and Glass Lewis, and monitors compliance; and

- Managing compensation risk – meets with the BNS Risk Committee to jointly review and recommend to the BNS Board all key elements of material compensation plans, including plan design, targets, metrics and potential pay-outs. Seeks independent advice and input from a third-party advisor.

The BNS HCOB has retained Hugessen Consulting Inc. (“Hugessen”) as its independent advisor since 2019 to advise on compensation-related matters including matters that are applicable to SIDAC, for example, regulatory trends and updates in the European Union. The HCOB also retains Semler Brossy Consulting Group LLC (“Semler Brossy”) to collaborate with Hugessen to provide a broader global perspective on executive compensation practices and related compensation governance matters. Hugessen and Semler Brossy are independent executive compensation consulting firms based in Toronto and Los Angeles, respectively.

The BNS HCOB held seven meetings in 2021 (2020: eight meetings), including a joint session with the BNS Risk Committee. Additional information on the BNS HCOB composition and compensation decision-making can be found in the Parent’s Management Proxy Circular at http://www.scotiabank.com/ca/en/0,,917,00.html.

14.1.2 Material Risk Taker Criteria

SIDAC follows EBA MRT regulatory technical standards[3], the Commission Delegated Regulation (EU) No 604/2014 and Guideline 4/Title I No. 5 of the EBA Guidelines on Sound Remuneration Policies to identify the following groups of employees as MRTs based on qualitative criteria (related to the role and decision-making authority of employees) and quantitative criteria (related to the level of total gross remuneration in absolute or relative terms). All MRTs are annually notified of their MRT status and specific remuneration regulatory requirements and requested to acknowledge their understanding of the requirements.

a) SIDAC executive-level employees;

b) Employees leading business line functions with a significant proportion of revenues, numbers of staff and capital usage;

c) Employees leading control and stewardship functions including risk, compliance, finance, audit and HR;

d) Employees responsible for developing and implementing SIDAC’s business line strategy;

e) Employees whose activities are deemed to have a material impact on SIDAC’s risk profile;

f) Higher earners and employees involved in trading activities who have a material impact on the risk profile of SIDAC; and

g) SIDAC’s non-executive Board members.

14.1.3 Link between pay and performance

In addition to base salary, SIDAC’s remuneration programme includes a mix of annual and deferred incentives – which together are variable pay, also known as “pay-at-risk” since they are not guaranteed and subject to performance and the BNS Clawback Policy. In compliance with the requirements set out within Article 94 (1) CRD, and SIDAC shareholder approval on July 18, 2014, SIDAC has set variable pay at a maximum ratio of 200% of fixed compensation for its MRTs.

Annual incentives reward employees for meeting annual corporate objectives (financial and non-financial) and individual deliverables. The main performance objectives in the Bank’s Annual Incentive Plan (“AIP”) for non-revenue generating roles, typically in control and support functions, include the following metrics, the Net Income Attributable to Common Shareholders (“NIACS”), operating leverage and a customer metric and are used to determine an all-Bank business performance factor (“BPF”). The BPF may be adjusted based on a Strategic & Operational Modifier focusing on meeting key objectives in the areas of culture and leadership, balance sheet management/quality of earnings, risk and regulatory governance, and Environmental, Social and Governance (“ESG”), reflecting a holistic view of the Bank’s performance, as well as other factors, as appropriate. The adjusted all-Bank BPF may be further adjusted based on performance relative to peers. Front-office revenue-generating employees receive incentives through the Global Banking and Markets Incentive Plan (“GBMIP”), where a discretionary bonus pool is funded based on Net Income Before Bonus and Tax

[3] Under Article 92(2) of the CRD, the EBA introduced regulatory technical standards to set out the criteria to identify categories of staff whose professional activities have a material impact on the firm’s risk profile.

("NIBBT") versus Plan and Net Income After Tax ("NIAT") versus Plan, and may be further adjusted based on performance relative to peers. Both AIP and GBMIP bonus pools can be adjusted by the BNS HCOB and BNS Risk Committee based on recommendations from the BNS CRO. Additionally, the SIDAC CRO can make recommendations to the SIDAC Board to adjust the SIDAC bonus spend.

Total remuneration of SIDAC employees, including MRTs, may be comprised of fixed remuneration (i.e., base salary, non-discretionary pension, other benefits and all allowances including mobility-related allowances) and variable remuneration (i.e., annual incentives including AIP and GBMIP schemes and deferred incentives including Europe RSU and Deferred Cash schemes). SIDAC typically provides severance at or above Irish statutory requirements and in line with market practice in Ireland. In accordance with the EU Capital Requirements Directives and related regulation and guidance, any early termination payments reflect performance achieved over time and do not reward for failure or misconduct and are made consistent with appropriate risk management. Severance payments to MRTs are made in compliance with EU Capital Requirements Directives remuneration requirements and Guideline 4/Title II No. 9.3 of the EBA Guidelines on Sound Remuneration Policies. Severance pay, if any, is determined on a case-by-case basis and involves legal and human resources. Additionally, SIDAC may seek the advice of external counsel to ensure any severance payments are sound.

In determining the appropriate mix of fixed and variable remuneration, an employee's ability to affect results over the longer term, the mix for similar positions in the markets in which SIDAC competes, and market practice are all considered.

Guaranteed variable remuneration is not part of SIDAC's remuneration approach and is discouraged in keeping with SIDAC's remuneration policy. One-time awards may be selectively provided to new-hire employees in their first year of employment to compensate for variable remuneration foregone from a previous employer, and in adherence to EU Capital Requirements Directives remuneration requirements and Guideline 4/Title II No. 9.1 of the EBA Guidelines on Sound Remuneration Policies. Additionally, retention awards, if any, may be made by SIDAC in exceptional circumstances only. All Retention awards comply with the EBA s requirements for variable remuneration including ex-post risk alignment, deferral, retention, malus and clawback.

Furthermore, SIDAC employees at the BNS executive level are required to hold equity in BNS to ensure their interests are aligned with those of BNS shareholders. Common shares, outstanding share units (for example: restricted share units) and holdings through the BNS Employee Share Ownership Plan all count towards meeting this requirement.

14.1.4 Design and Structure of Remuneration

Fixed Remuneration

Fixed remuneration includes base salary, non-discretionary pension, and other benefits and allowances, including mobility-related allowances. The fixed remuneration of MRTs reflects their professional experience and organizational responsibility taking into account the level of education, the degree of seniority, the level of expertise and skills, the constraints (e.g., social, economic, cultural or other relevant factors) and job experience, the relevant business activity and local remuneration levels.

Salary

Base salary is paid in non-deferred cash and compensates employees for fulfilling their day-to-day roles and responsibilities, including leadership and management duties. Total remuneration, including base salary and incentives, is reviewed annually and adjusted where appropriate based on each employee's role and experience, sustained performance, internal job value and local external market practice.

Pension Plan

SIDAC operates two registered pension schemes for its employees, a defined benefit pension ("DB") scheme which is closed to new members effective November 2005, and a defined contribution ("DC") scheme. The schemes are funded over the employees' period of service and the assets of the schemes are held in separate trustee-administered funds. In addition, SIDAC makes employer contributions that mirror the DC scheme to Personal Retirement Savings Accounts ("PRSAs") for temporary or fixed-term employees.

Variable Remuneration

Variable pay is comprised of annual incentives (paid in non-deferred cash or a mix of non-deferred cash and immediately-vested Restricted Share Units ("RSUs") and deferred incentives (paid in RSUs or a mix of deferred cash and RSUs) for all employees including material risk takers, the management body and control function staff. For all Group Treasury and back- and middle-office employees, including employees in control functions (i.e., risk management, compliance, internal audit and finance) and supporting personnel who are not client-facing, these incentives are delivered through the Annual Incentive Plan ("AIP") and deferred compensation programmes. For GBM front-office employees, these incentives are delivered through the GBMIP where a portion of the GBMIP award is delivered as upfront incentives and a portion is delivered as deferred incentives. See 14.1.5 and 14.1.6 below.

The separate variable remuneration plans outlined above ensure independence of incentives for control functions from the front-office business they support.

14.1.5 Annual Incentives (Upfront Variable Remuneration)

Rationale & Eligibility Criteria

All SIDAC employees are eligible to participate in an annual incentive plan. Annual incentives are designed to reward employees for their contribution to the achievement of BNS' annual financial and non-financial goals.

In 2021, SIDAC had two annual incentive programmes for employees, including MRTs, designed to reward employees for their contribution to the achievement of annual goals.

- AIP, for all back- and middle-office employees, including employees in control function roles and supporting personnel who are not client-facing, as well as Group Treasury employees;
- GBMIP, for GBM front-office employees in designated units and roles that support revenue generation. The GBMIP programme includes an upfront component and a deferred component. That is, a portion of the annual GBMIP award is paid upfront and the remainder is deferred to provide alignment to BNS' longer-term performance (see 13.1.6 below).

Performance Measurement/Assessment

The AIP rewards employees based on BNS' performance on financial and customer metrics for the fiscal year and on individual performance, which has a significant impact on final awards. The AIP includes risk-adjusted measures that reflect the full range of potential risks. The aggregate AIP pool is determined based on BNS' achievement on a scorecard of all-Bank measures: NIACS, operating leverage and customer goals, and may be adjusted based on a Strategic & Operational Modifier and for performance relative to peers, as well as a discretionary risk adjustment that is approved by the Parent Board after considering performance against BNS' Risk Appetite Framework.

The GBMIP rewards eligible employees of GBM for the achievement of GBM's overall and business line objectives. The aggregate GBMIP pool is determined based on GBM's NIBBT and NIAT, adjusted for performance relative to peers and overall BNS performance, as well as a discretionary risk adjustment that is approved by the BNS HCOB after considering performance against BNS' Risk Appetite Framework. Individual awards consider individual and business line performance, as well as market positioning and the pool of funds available.

Risk Adjustment

Prior to annual incentive awards being approved, the BNS CRO assesses whether there are any other potential risks that should be reflected in the incentive pool funding and recommends adjustments – where appropriate – to the BNS HCOB and BNS Risk Committee. Additionally, SIDAC's CRO assesses risks undertaken by SIDAC including compensation plan design, conduct considerations, considerations on performance against risk appetite, with input from SIDAC's Compliance and Finance functions, the use of financial resources within SIDAC in conducting its activities during the fiscal year, and may recommend adjustments to the aggregate SIDAC incentive spend – if necessary – to the SIDAC Board and to the BNS HCOB and BNS Risk Committee (in a joint meeting). For further details please refer to section 14.1.7.

Additionally, the Head of Compliance assesses whether SIDAC's remuneration policies are in compliance with EU regulations including the EBA Guidelines, and whether the policies impact SIDAC's ability to comply with other areas of legislation, regulations, internal policies and risk culture, as well as address any conduct or compliance matters related to individual staff members that require ROC and or SIDAC Board consideration in terms of potential compensation impacts including clawbacks.

***Deferral and Vesting*[4]**

For participants in the AIP programme:

- Non-exempt MRTs[8] receive 50% of their AIP upfront award in immediately-vested RSUs pursuant to the BNS Restricted Share Unit Plan for Participants in Europe(the "Europe RSU Plan") and the remainder is paid in non-deferred cash.
- Exempt MRTs[5] and other SIDAC employees participating in AIP receive their full award in non-deferred cash. There is no regulatory restriction on how the payment of their annual incentive should be made.

For participants in the GBMIP programme:

- The percentage of the upfront portion of the GBMIP award varies depending on GBM job level and remuneration.
- Non-exempt MRTs receive 50% of their GBMIP upfront portion in immediately-vested RSUs pursuant to the Europe RSU Plan and the remainder is paid in non-deferred cash.
- Exempt MRTs and other GBMIP employees receive their full GBMIP upfront portion in cash.

RSUs awarded to all MRTs do not attract reinvested dividend equivalents and are subject to a 12-month retention period prior to payment. Payment of the immediately-vested RSUs is based on the value of the units at the time of payment in cash.

14.1.6 Deferral Incentives (Deferred Variable Remuneration)

Rationale & Eligibility Criteria

A portion of the incentive awards made to MRTs is deferred to reward them for sustained performance over a three- or five-year period. Deferred incentive awards include RSUs and Deferred Cash Awards. The Company does not apply a discount rate for deferred incentives. The following are considerations in setting the actual deferral period for each MRT and proportion of incentive to be deferred:

- responsibilities and authorities of MRTs and the tasks they perform
- business cycle and nature of SIDAC's activities
- expected fluctuations in the economic activity and performance and risks of SIDAC and the impact of MRTs on these fluctuations
- ratio between variable and fixed compensation, and the absolute amount of variable remuneration

For AIP participants, the Europe RSU Plan is intended for key individuals who have the ability to assist in creating future shareholder value. Employees in control function roles and supporting personnel who are not client-facing at the internal director level and above may be eligible to receive grants of deferred compensation. On a case-by-case basis, in order to meet the deferral requirements of the EBA Guidelines, RSUs may be awarded to non-exempt MRTs below director level (employees below director level are typically not eligible for RSU awards) as a carve-out of their annual AIP incentive.

All GBM front-office employees in client-facing roles and roles that support revenue generation are eligible to participate in the GBMIP programme. Participants may receive a portion of their GBMIP award in deferred incentives which includes Europe RSUs, where the portion of the total deferred incentive is dependent on the total variable incentive awarded and may vary between 15% - 40% depending on GBM job level and remuneration. The Europe RSU Plan is an integral part of the GBMIP designed to align the interests of GBM employees with those of BNS shareholders. On a case-by-case basis and in order to meet the deferral requirements of the EBA Guidelines, non-exempt MRTs in GBM may receive a higher portion of their incentive as deferred incentive than is indicated by their job level.

Deferred Cash Awards are intended for non-exempt MRTs only. All non-exempt MRTs in SIDAC are eligible to receive Deferred Cash Awards, and such awards make up 50% of the total deferred incentive.

---

[4] Note that the EBA deferral rules are not a regulatory requirement for SIDAC as the company is not categorised as a significant institution, but SIDAC has chosen to apply the criteria to non-exempt MRTs.
[5] Exempt MRTs are those for whom a waiver has been granted by the CBI, exempting them from full application of the MRT remuneration rules.

Performance Measurement/Assessment

For AIP participants, the Europe RSU Plan is designed to reward nominated employees at the internal director level and certain executives in Ireland for delivering sustained shareholder value.

For GBMIP participants, the Europe RSU Plan allows GBM employees to receive a portion of their incentive award as RSUs tied to BNS common share price.

RSUs gain value with the appreciation in the Parent's common share price.

Deferral and Vesting

AIP participants at the internal director level and above may be eligible to receive grants of deferred compensation in addition to an AIP award. Deferral and vesting of deferred incentives for MRTs are as follows:

- Non-exempt MRTs receive 50% of their deferred award in RSUs and 50% as Deferred Cash Awards. Both RSUs and Deferred Cash Awards vest pro-rata over a three- or five-year deferral period depending on the MRT's role[6]. The portion of the total incentive deferred varies between 40% and 60%, depending on the non-exempt MRT's remuneration[7].
- Exempt MRTs and other eligible participants in AIP, depending on seniority, may receive deferred compensation on a discretionary basis based on individual performance and potential, and awards typically range between 0% - 40% of total incentives received. Awards are made entirely in RSUs that vest 100% at the end of three years.

GBMIP participants receive a portion of their award as deferred compensation.

- Non-exempt MRTs who are GBMIP participants have the same vesting and deferral criteria as non-exempt MRT participants of the AIP programme (see above).
- Exempt MRTs and other participants in GBMIP receive their entire deferred award in RSUs that vest in equal instalments over three years. The portion of total deferred incentive varies between 15% - 40% depending on GBM job level and remuneration.

RSUs awarded to all MRTs do not attract reinvested dividend equivalents and are subject to a 12-month retention period prior to payment. Payment of the RSUs is based on the value of the units at the time of payment in cash.

Risk Adjustments

Prior to the awards vesting, the BNS CRO assesses whether there are any other potential risks that should be reflected in the amount vesting and recommends adjustments, where appropriate, to the BNS HCOB and BNS Risk Committee. Additionally, SIDAC's CRO produces a risk assessment on operations and adherence to business risk appetite. For further details please refer to section 14.1.7.

14.1.7 Risk Management and Risk Adjustment

SIDAC's and BNS' approach to risk management and compensation is to ensure alignment of compensation with the respective organizations' risk profile and risk time horizon. The compensation programme takes into account the risks that employees take on behalf of SIDAC and BNS, and ensures compensation takes into consideration prospective risks and outcomes.

In designing employee compensation programmes, SIDAC and BNS strive to ensure that:

1. Risk is carefully managed, so that all business performance targets and individual/department objectives can be accomplished within established risk policies, limits, processes and standards. The key metrics on which incentive compensation plans are based are approved by the Parent Board. Employees are discouraged from taking unreasonable and excessive risks through a strong internal risk culture that is reinforced by compensation programmes. By delivering incentive compensation through a combination of annual, mid-term and long-term incentives that reflect the organization's risk profile and by deferring a substantial portion of the incentive compensation paid to senior executives and other employees whose actions can have a material impact on risk,

[6] 4-year vesting for MRTs occurs on a pro-rata basis at the end of years 1 through 4. Where a SIDAC MRT also meets the local criteria for higher risk, the employee will be subject to 5-year vesting, on a pro-rata basis at the end of years 1 through 5.

[7] 60% deferral applies to High-earner MRTs which are those MRTs whose variable remuneration exceeds €300,000. For all other non-exempt MRTs, 40% to 50% deferral applies.

employees are discouraged from taking unreasonable and excessive risks. Caps are also placed on annual incentive funding in conjunction with stress-testing potential pay-outs and implementing share ownership and post-retirement share retention requirements to ensure shareholder alignment on a long-term basis.

2. The SIDAC Board is responsible for ensuring compliance with key CBI and EU remuneration regulatory requirements and overseeing the implementation of policies and procedures to support the requirements, including those of the EBA, CBI, CRD and CRR. The Compliance function analyses the impact of SIDAC's remuneration on compliance with legislation, regulations, internal policies and risk culture and reports any findings.
3. SIDAC has a compensation adjustment process for all employees, the purpose of which is to maintain the alignment between risk and rewards to ensure that variable remuneration is paid / vests only if it is sustainable, taking into account the financial situation of SIDAC, and justified on the basis of the performance of SIDAC, the business area and the individual(s) concerned. Under this framework, SIDAC may take action to adjust variable remuneration either individually or collectively. This process includes SIDAC's CRO assessing the risks undertaken by SIDAC including compensation plan design, conduct considerations, considerations on performance against risk appetite, input from SIDAC's compliance and finance functions, and the use of financial resources within SIDAC in conducting its activities during the fiscal year, and recommending adjustments to the aggregate Ireland incentive spend – if necessary – to the SIDAC Board and the BNS HCOB and BNS Risk Committee (in a joint meeting). Additionally, the SIDAC Board assesses the achievement of performance targets and the need for ex-post risk adjustment, including any proposed application of malus and clawback arrangements in SIDAC. Finally, the process includes input from SIDAC Finance on the quality and sustainability of net income and profit that feeds into the determination of bonus spend in SIDAC, and evaluations conducted for SIDAC through its ICAAP to ensure SIDAC has been prudent in managing its capital.
4. Measures for incentive programmes are thoroughly reviewed by the BNS senior executive leadership team: A committee has been established of the President and CEO of the Parent and his direct reports, the BNS Human Capital Committee ("BNS HCC"), that provides senior leaders with the opportunity to review and evaluate the key aspects of material incentive programmes from an overall policy and comprehensive risk basis.
5. The BNS Risk Committee participates in reviews of the design and results of incentive programmes: BNS Risk Committee members and BNS HCOB members jointly review and approve the design, metrics, targets, and payouts of material incentive programmes. In addition, SIDAC's CRO, produces a risk assessment analysis on operations and adherence to business risk appetite.
6. Control and stewardship functions including risk management, legal, compliance and anti-money laundering, finance, internal audit, and human resources are independent from the business units they oversee and have responsibility independent from the business to provide objective assessment, reporting and / or assurance. Control functions have appropriate authority and are remunerated in accordance with their functional objectives. The remuneration of all MRTs including control function heads is overseen by the SIDAC Board and the BNS HCOB and is predominantly fixed, to reflect the nature of their responsibilities. Compensation for control and stewardship function employees is tied to overall Bank performance only. These employees participate in the Bank's global programme and are excluded from any incentive programme offered by the business line they support. Control and stewardship function management have day-to-day responsibility and ultimate accountability for control and stewardship function employees including hiring decisions, performance appraisals, and compensation.
7. To ensure appropriate linkage between incentive compensation and risk, possible breaches are reviewed for Material Risk Impact (MRI) employees throughout the Parent organisation by the BNS CRC (whose membership includes the global heads of finance, risk management, legal, compliance, internal audit and human resources) and for MRTs in SIDAC by the local conduct sub-committee of the SIDAC ROC.
8. Clawback and malus provisions: The BNS Clawback Policy and SIDAC's 'Schedule B' of the same policy, applies to covered individuals and employee groups, including SIDAC MRTs. Employees may forfeit outstanding awards, be required to repay previous compensation or have future grants reduced if there is: a) employee misconduct, misbehaviour, fraud or gross negligence; b) material risk management failure of the firm and/or business unit; c) material misstatement of the Parent's or a business of the Parent's financial results; d) material downturn in financial performance; e) significant increases in the Parent's or a business of the Parent's economic or regulatory capital base; f) any regulatory sanctions where the conduct of the covered individual contributed to the sanctions; or g) there is reasonable evidence of an MRT engaging in misbehaviour/misconduct or committing a material error.

9. Anti-hedging and non-assignability provisions prohibit employees from utilizing hedging strategies or derivatives to circumvent the risk alignment effects of the Parent's compensation programmes.
10. Compensation programmes are reviewed independently of management. The Parent's internal audit group conducts an annual review of compensation programmes and practices, reporting directly to the BNS HCOB. The review includes all material compensation plans and programmes, and assessment of the appropriateness of these plans and programmes against organisational goals and risk profile as well as the FSB principles and standards, and an assessment of appropriateness of pay-outs relative to performance and risk.
11. SIDAC's internal audit and compliance teams conduct annual reviews of the remuneration programmes applicable to SIDAC employees against remuneration-related regulatory requirements. SIDAC's Internal Audit provides an independent opinion on the design and operating effectiveness of internal controls to ensure that remuneration policies and procedures in SIDAC comply with the applicable regulation of the CBI and EBA. The regulations apply to all SIDAC staff with specific requirements for material risk taker compensation. Compliance conduct tests to provide an opinion on the adequacy of and adherence to the applicable regulation and controls related to remuneration in order to mitigate regulatory and/or other compliance risks.

14.2 Quantitative Disclosure

The following pages show compensation awards and related data for 2021 and prior fiscal year MRTs and Directors who are not executives of SIDAC. Tables relating to fiscal 2021 remuneration have been produced using the ANNEX XXXIV– Instructions for the disclosure of remuneration policy templates. The information is reported by major business areas, control function and management group. The figures reflect the full value of the compensation awarded to MRTs in a manner appropriate to the size, nature and internal organization of SIDAC.

14.2.1 Material Risk Takers

2021 Fiscal Year

The tables below summarise total remuneration for fiscal year 2021 for MRTs and SIDAC's Non-Executive Directors and includes variable remuneration awards made after the end of the fiscal year to reflect decisions made during the compensation planning cycle. The Deferred Remuneration table is a snapshot of outstanding deferred remuneration as of October 31st, 2021 and deferred remuneration awarded / redeemed during the respective fiscal year.

Table 42 – EU REM1 – Remuneration awarded for the fiscal year (Article 450(1)(h)(i)-(ii))

	Management Body Supervisory function(1)	Management Body Management function(2)	Other senior management	Other identified staff
FIXED REMUNERATION				
Number of identified staff	**6**	**9**		**10**
Total fixed remuneration(3)	**264**	**2,877**	**-**	**1,727**
Cash	264	2,877	-	1,727
VARIABLE REMUNERATION				
Number of identified staff	**-**	**9**	**-**	**10**
Total variable remuneration	**-**	**1,586**	**-**	**740**
Cash	-	793	-	370
Cash deferred	-	344	-	148
Shares	-	-	-	-
Shares deferred	-	-	-	-
Share-linked instruments	-	793	-	370

Share-linked deferred	-	344	-	148
Other instruments	-	-	-	-
Other instruments deferred	-	-	-	-
Other forms	-	-	-	-
Other forms deferred	-	-	-	-
Total Remuneration	**264**	**4,463**	**-**	**2,467**

(1) For purposes of the Pillar 3 disclosure, Management Body Supervisory function is defined as SIDAC's Non-Executive Directors
(2) For purposes of the Pillar 3 disclosure, Management Body Management function is defined as members of the Executive Committee
(3) Includes year-end base salary, pension, benefits and aggregate allowances

Table 43 – EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (Article 450(1)(h)(v)-(vii))

During 2021, no sign-on award was provided to an MRT (2020:nil), and no MRT received severance payments during fiscal 2021 (2020: nil).

	Management Body Supervisory function(1)	Management Body Management function(2)	Other senior management	Other identified staff
Guaranteed variable remuneration				
Number of identified staff	-	-	-	-
Total amount	-	-	-	-
Paid during the FY	-	-	-	-
Severance payments awarded in previous periods, that have been paid out during the FY				
Number of identified staff	-	-	-	-
Total amount	-	-	-	-
Severance payments awarded during the FY				
Number of identified staff	-	-	-	-
Total amount	-	-	-	-
Paid during the financial year	-	-	-	-
Deferred	-	-	-	-
Not taken into account in the bonus cap	-	-	-	-
Highest payment awarded to a single person	-	-	-	-

(1) For purposes of the Pillar 3 disclosure, Management Body Supervisory function is defined as SIDAC's Non-Executive Directors
(2) For purposes of the Pillar 3 disclosure, Management Body Management function is defined as members of the Executive Committee

Table 44 – EU REM3 – Deferred remuneration (Article 450(1)(h)(iii)-(iv))

The values of outstanding awards are estimated using the closing share price of the Parent's common shares on October 31, 2021 of C$81.14. The table includes former MRTs who remain entitled to deferred compensation (i.e., deferred cash, deferred share-linked instruments), as well as prior awards granted to MRTs including grants when the employees were employed by SIDAC but not in MRT roles. The table does not include deferred remuneration that was awarded in December 2021 in respect of fiscal 2021 – these awards are reflected in the Table EU REM1 – Remuneration awarded for the fiscal year above.

Deferred and retained remuneration	Awarded	Vested	Unvested	Performance adjustment to deferred remuneration vesting in the FY	Performance adjustment to deferred remuneration vesting in future performance years	Adjustment during the FY due to ex post implicit adjustments	Paid out	Vested but subject to retention
Management Body Supervisory function[(1)]								
Cash	-	-	-	-	-	-	-	-
Shares	-	-	-	-	-	-	-	-
Share-linked instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Management Body Management function[(2)]	1,180	109	1,071				193	109
Cash-based	439	-	439	-	-	-	102	-
Shares	-	-	-	-	-	-	-	-
Share-linked instruments	741	109	632	-	-	-	91	109
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Other senior management								
Cash-based	-	-	-	-	-	-	-	-
Shares	-	-	-	-	-	-	-	-
Share-linked instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Other identified staff	565	100	465				276	100
Cash-based	195	-	195	-	-	-	123	-
Shares	-	-	-	-	-	-	-	-
Share-linked instruments	370	100	270	-	-	-	153	100
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
Total amount	**1,745**	**209**	**1,536**	**-**	**-**	**-**	**469**	**209**

(1) For purposes of the Pillar 3 disclosure, Management Body Supervisory function is defined as SIDAC's Non-Executive Directors
(2) For purposes of the Pillar 3 disclosure, Management Body Management function is defined as members of the Executive Committee

Table 45 – EU REM4 – Remuneration of 1 million EUR or more per year (Article 450(1)(i))

There were no employees that received total remuneration exceeding EUR 1 million in fiscal 2021 (Nil employees in prior year).

Total Remuneration Band (EUR)	2021 Number of MRTs	2020 Number of MRTs
1 000 000 to 1 500 000	-	-
1 500 000 to 2 000 000	-	-
2 000 000 to 2 500 000	-	-
2 500 000 to 3 000 000	-	-
3 000 000 to 3 500 000+	-	-
Total	**Nil**	**Nil**

Table 46 – EU REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (Article 450(1)(g))

	MB Supervisory function(1)	MB Management function(2)	Total MB	Investment banking	Retail banking(3)	Asset mgt.	Corporate functions	Independent internal control functions	All other	Total
Total number of identified staff										**25**
Management Body	6	9	15							
Other senior mgt.				-	-	-	-	-	-	
Other identified staff				-	1	-	4	5	-	
Total remuneration of identified staff	**264**	**4,462**	**4,726**	**-**	**302**	**-**	**825**	**1,340**	**-**	
Variable remuneration	-	1,585	1,585	-	95	-	281	364	-	
Fixed remuneration(4)	264	2,877	3,141	-	207	-	544	976	-	

(1) For purposes of the Pillar 3 disclosure, Management Body Supervisory function is defined as SIDAC's Non-Executive Directors
(2) For purposes of the Pillar 3 disclosure, Management Body Management function is defined as members of the Executive Committee
(3) Retail Banking is included for the purposes of the Pillar 3 disclosure only and encompasses MRTs whose roles are predominantly, but not limited to, wholesale lending. SIDAC does not have a retail banking division
(4) Includes year-end base salary, pension, benefits and aggregate allowances

2020 FISCAL YEAR

Fixed and Variable Remuneration for 2020 MRTs (pro-rated for part-year MRTs or employees who joined SIDAC or transferred in from or out to the BNS group)

31 October 2020 US$'000	Remuneration for the fiscal year	Front Office[8]	Control and Support Functions	Senior Management[9]	Non-Senior Management
Number of Material Risk Takers	15	7	8	8	7
Fixed					
Cash[10]	3,772	1,308	2,464	2,712	1,061
Total Fixed Pay	**3,772**	**1,308**	**2,464**	**2,712**	**1,061**
Variable					
Non-deferred cash	438	171	268	329	110
Non-deferred share linked instruments	438	171	268	329	110
Deferred cash	337	129	207	263	73
Deferred share linked instruments	337	129	207	263	73
Total Variable Pay	**1,550**	**600**	**950**	**1,184**	**366**
Total remuneration	**5,322**	**1,908**	**3,414**	**3,896**	**1,427**
Ratio between variable and fixed component of remuneration	**41%**	**46%**	**39%**	**44%**	**34%**

[8] Front Office Includes Group Treasury and Corporate Banking Employees
[9] For purposes of quantitative disclosures, 'Senior Management' in these tables refers to the SIDAC Executive Committee (voting members).
[10] Includes base salary, pension, benefits and total allowances. Base salaries are reflected at a point in time (e.g. 31 October 2020 for full-year MRTs) for consistency with how variable pay awards are determined.

Variable pay earned during fiscal year 2020 for MRTs, split between cash and share-linked instruments

31 October 2020 US$'000	**Awarded for the fiscal year**		**Front Office**Error! Bookmark not defined.	**Control and Support Functions**		**Senior Management**Error! Bookmark not defined.	**Non-Senior Management**
Number of Material Risk Takers	**15**		**7**	**8**		**8**	**7**
Cash							
Non-deferred cash	438		171	268		329	110
Deferred cash	337		129	207		263	73
Total Cash	**775**		**300**	**475**		**592**	**183**
Share Linked Instruments							
Non-deferred share linked instruments	438		171	268		329	110
Deferred share linked instruments	337		129	207		263	73
Total Share Linked Instruments	**775**		**300**	**475**		**592**	**183**
Total Variable Pay	**1,550**		**600**	**950**		**1,184**	**366**

Deferred remuneration outstanding as at 31 October, 2020 and awarded/redeemed in fiscal 2020

The values of outstanding awards are estimated using the closing share price of BNS' common shares on 31 October 2020 of C$55.35. The table includes former MRTs who remain entitled to deferred compensation (i.e., deferred cash, deferred share-linked instruments), as well as prior awards granted to MRTs including grants when the employees were employed by SIDAC but not in MRT roles. The table does not include deferred remuneration that was awarded in December 2020 for fiscal 2020 – these awards are included in the 2020 tables above.

31 October 2020 US$'000	**Total deferred remuneration**		**Front Office**Error! Bookmark not defined.	**Control and Support Functions**		**Senior Management**Error! Bookmark not defined.	**Non-Senior Management**
Outstanding and Vested[11]	441		120	321		264	175
Outstanding and Unvested	1,068		235	833		516	551
Awarded during financial year	1,012		321	690		665	347
Paid Out	773		165	606		299	473
Reduced through performance adjustments	-		-	-		-	-

SIDAC Board

The table below summarises total remuneration earned during 2020 for remunerated Directors who are not executives of SIDAC. Remunerated Directors received their entire remuneration as fixed compensation (i.e., they received no variable compensation).

Table – Non-Executive Director Remuneration

US$'000	**Fixed Remuneration**	**Variable Remuneration**	**Total Remuneration**		**Number of Non-Executive Directors**
31 October 2020	331		331		6

[11] Vesting Includes the additional 12-month retention period for EEA RSUs prior to payment.

15 Appendix 1 – CRR Roadmap

Table 47 – CRR Roadmap

CRR Ref	High Level Summary	Company Reference
431	**Scope of disclosure requirements**	
431 (1)	Requirement to publish Pillar 3 disclosures.	Scotiabank (Ireland) Designated Activity Company Pillar 3 Disclosures as at October 2021.
431 (2)	Firms with permission to use specific operational risk methodologies must disclose operational risk information.	Not applicable as SIDAC does not use Advanced Measurement Approaches for operational risk.
431 (3)	Institution must have a policy covering frequency of disclosures, their verification, comprehensiveness and overall appropriateness. Additionally, Institution must have written attestation of at least one member of the management body or senior management that the required disclosures have been made.	Section 1.4 and 1.5.
431 (4)	Quantitative disclosures must be accompanied by qualitative narrative and any other supplementary information required to understand the disclosures.	Provided throughout these Disclosures where required.
431 (5)	Explanation of ratings decision upon request.	Not applicable for SIDAC.
432	**Non-material, proprietary or confidential Information**	
432 (1)	Institutions may omit information that is not material if certain conditions are respected.	SIDAC complies with all relevant disclosure requirements with regards to non-material, proprietary or confidential information.
432 (2)	Institutions may omit information that is proprietary or confidential if certain conditions are respected.	
432 (3)	Where 432 (1) and (2) apply this must be stated in the disclosures, and more general information must be disclosed.	
433	**Frequency of disclosure**	
	Disclosures must be published once a year at a minimum on the same date of publication of financial statements, and more frequently if necessary.	Section 1.4
433 (a)	**Disclosures by large institutions**	
433 (a) (1)	Disclosures under specified articles must be made on an annual, semi-annual or quarterly basis as is identified in this article.	Not applicable as SIDAC is not a large institution.
433 (a) (2)	Non-listed G-SIIs are required to disclose information relating to specified articles on an annual or semi-annual basis as identified in this article.	
433 (a) (3)	Large institutions subject to articles 92a or 92b must make additional disclosures on a semi-annual or quarterly basis as identified in this article.	
433 (b)	**Disclosures by small and non-complex institutions**	
433 (b) (1)	Disclosures under specified articles must be made on an annual or semi-annual basis as is identified in this article.	Not applicable as SIDAC is not a small and non-complex institution.
433 (b) (2)	Non-listed small and non-complex institutions are required to disclose information relating to specified articles on an annual basis as identified in this article.	
433 (c)	**Disclosures by other institutions**	
433 (c) (1)	Disclosures under specified articles must be made on an annual, semi-annual basis as is identified in this article.	Disclosures are made on an annual basis as per Article 433(c)(2).
433 (c) (2)	Non-listed other institutions are required to disclose information relating to specified articles on an annual basis as identified in this article.	Disclosures are made on an annual basis as per this derogation as SIDAC meets the definition of a non-listed other institution.
434	**Means of disclosures**	
434 (1)	To include all required disclosures in electric format in one appropriate medium. Medium shall be standalone document or distinctive section of financial statements or financial reports containing the required disclosures.	These Disclosures are provided as a standalone document.
434 (2)	Institutions shall make their disclosure available on their website and shall be kept accessible for a period of time that shall be no less than the storage period set by national law for information contained in financial reports.	Section 1.4
434 (a)	**Uniform disclosure formats**	
	EBA shall develop implementing technical standards specifying uniform disclosure formats and associated instructions in accordance with the disclosures required under CRR.	These Disclosures comply with Commission Implementing Regulation (EU) 2021/637
435	**Risk management objectives and policies**	

CRR Ref	High Level Summary	Company Reference
435 (1) (a)	Disclose information on strategies and processes to manage risks.	Section 3
435 (1) (b)	Disclose information on structure and organisation of risk management function.	Section 3.1
435 (1) (c)	Disclose information on risk reporting and measurement systems.	Section 3.3
435 (1) (d)	Disclose information on hedging and mitigating risk.	Sections 3 – 11 as applicable for each of the risks.
435 (1) (e)	Declaration approved by the management body on the adequacy of risk management arrangements with regard to the institution's profile and strategy.	Section 3
435 (1) (f)	Inclusion of a concise risk statement approved by the Board.	Section 3
435 (2)	Information on governance arrangements, including information on Board composition and recruitment, and risk committees.	Section 3.1
435 (2) (a)	Number of directorships held by directors.	Section 3.1
435 (2) (b)	Recruitment policy of Board members, their experience and expertise.	Section 3.1
435 (2) (c)	Policy on diversity of Board membership and results against targets.	Section 3.1
435 (2) (d)	Disclosure of whether a dedicated risk committee is in place, and number of meetings in the year.	Section 3.1
435 (2) (e)	Description of information flow on risk to Board.	Section 3.1 Section 3.3
436	**Scope of application**	
436 (a)	Name of institution.	Section 1.1
436 (b)	Reconciliation between consolidated financial statements prepared under the applicable accounting framework and the consolidated financial statements prepared under the requirements of the regulatory consolidation. This should outline differences between scopes, and legal entities included in consolidation, whether entities are fully or proportionally consolidated and whether the holdings are deducted from own funds.	Table EU L1 – page 8
436 (c)	Breakdown of assets and liabilities of consolidated financial statements prepared under regulatory requirements, broken down by risk type.	Table EU L1 – page 8
436 (d)	Reconciliation identifying main source of differences between carrying value under regulatory scope of consolidation and the exposure amount used for regulatory purposes.	Table EU L2 – page 9
436 (e)	Breakdown of amounts of constituent elements of prudent valuation adjustment for, by risk type, exposures from trading and non-trading books which are adjusted per Articles 34 and 105.	Not applicable as SIDAC does not use core approach for prudential valuation adjustments.
436 (f)	Impediments to transfer of funds between parent and subsidiaries.	Not applicable as SIDAC does not prepare consolidated accounts.
436 (g)	Capital shortfalls in any subsidiaries outside of scope of consolidation.	Not applicable as SIDAC does not prepare consolidated accounts.
436 (h)	Making use of articles on derogations from a) prudential requirements or b) liquidity requirements for individual subsidiaries/entities.	Not applicable as SIDAC does not prepare consolidated accounts.
437	**Own funds**	
437 (1)	Institutions shall disclose the following information regarding their own funds:	
437 (1) (a)	A full reconciliation of Common equity tier 1 items, Additional tier 1 items, Tier 2 items and filters and deductions to own funds of the institution and to the statutory balance sheet in the audited financial statements	Table EU CC2 – page 10 Table EU CC1 – page 11
437 (1) (b)	A description of the main features of capital instruments issued by the institution.	Appendix 4
437 (1) (c)	The full terms and conditions of all capital instruments issued by the institution.	Not applicable as private placement.
437 (1) (d)	Disclosure of the nature and amounts of the following: (i) Each prudential filter applied; (ii) Each capital deduction applied; (iii) Items not deducted from capital.	Table EU CC1 – page 11
437 (1) (e)	A description of all restrictions applied to the calculation of own funds in accordance with this Regulation and the instruments, prudential filters and deductions to which those restrictions apply.	Table EU CC1 – page 11
437 (1) (f)	A comprehensive explanation of the basis on which capital ratios are calculated where those capital ratios are calculated by using elements of own funds determined on a basis other than the basis laid down in this Regulation.	Table EU CC1 – page 11
437 (a)	**Disclosure of own funds and eligible liabilities**	
437 (a) (1)	Institutions subject to Articles 92a or 92b should disclose the following:	

CRR Ref	High Level Summary	Company Reference
437 (a) (1) (a)	Composition of own funds and eligible liabilities, their maturity and their main features.	Not applicable as SIDAC is not subject to Articles 92a and 92b.
437 (a) (1) (b)	Ranking of eligible liabilities in the creditor hierarchy.	
437 (a) (1) (c)	Total amount of issuance of eligible liabilities instruments and amount of those issuances included in eligible liabilities items.	
437 (a) (1) (d)	Total amount of excluded liabilities referred to in article 72a(2).	
438	**Disclosure of own funds requirements and risk-weighted exposure amounts**	
438 (a)	Summary of institution's approach to assessing adequacy of capital levels.	Section 2.1
438 (b)	Own funds requirements based on supervisory review process per Article 104(1)(a), including composition of Common Equity Tier 1, additional Tier 1 and Tier 2 instruments.	Table EU KM1 – page 20
438 (c)	Upon demand from relevant component authority, result of the ICAAP process.	Section 2.1
438 (d)	Total risk-weighted exposure amount and corresponding total own funds requirement, broken down by risk categories, and explanation of effect on calculations resulting from application of capital floors.	Table EU OV1 – page 19
438 (e)	On and off-balance sheet exposures, the RWA amounts and associated expected losses for specialised lending.	Not applicable as SIDAC does not use the simple risk weighted approach.
438 (f)	Exposure value and RWA exposure amount of own funds held in insurance and reinsurance undertakings, or insurance holding company that institutions do not deduct from own funds when calculating capital requirements.	Not applicable to SIDAC's business.
438 (g)	Supplementary own funds requirement and capital adequacy ratio of the financial conglomerate calculated in accordance with Article 6 of Directive 2002/87/EC	Not applicable as SIDAC is not a financial conglomerate,
438 (h)	Variations in risk weighted exposure amounts of current period compared to preceding period resulting from use of internal models, including outline of key drivers.	Not applicable as SIDAC does not use internal models.
439	**Exposure to counterparty credit risk (CCR)**	
439 (a)	Description of process to assign internal capital and credit limits to CCR exposures, including exposures to central counterparties.	Section 4.5
439 (b)	Description of policies related to guarantees and other credit risk mitigants.	Section 4.4
439 (c)	Description of policies related to general and specific wrong-way risk.	Section 4.7
439 (d)	Disclosure of collateral to be provided (outflows) in the event of a ratings downgrade.	Section 4.5 (not applicable)
439 (e)	Amount of segregated and unsegregated collateral received and posted per type of collateral, both for derivatives and securities.	Table EU CCR5 – page 49
439 (f)	Derivative exposures before and after credit risk mitigation.	Table EU CCR1 – page 50
439 (g)	Securities financing exposures before and after credit risk mitigation.	Table EU CCR1 – page 50
439 (h)	Exposure values and credit risk mitigation effects and associated risk exposures for credit valuation adjustment capital charge.	Table EU CCR2 – page 51
439 (i)	Exposure value and risk exposures to central counterparties.	Table EU CCR8 – page 52
439 (j)	Notional amounts and fair value of credit derivative transactions.	Not applicable as SIDAC did not hold reportable positions in the period.
439 (k)	The estimate of alpha where permission received to use own estimate.	Table EU CCR1 – page 50 (N/A)
439 (l)	Separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452.	Table EU CCR3 – page 51
439 (m)	For institutions using the methods set out in Sections 4 to 5 of Chapter 6 of Title II Part Three, the size of their on- and off-balance sheet derivative business as calculated in accordance with Article 273a(1) or (2)	Not applicable to SIDAC.
439 (End Note)	Where central bank provides liquidity assistance in the form of collateral swaps, component authority may exempt institutions from requirements of points (d) and (e)	Not applicable to SIDAC.
440	**Capital buffers**	
440 (1) (a)	Geographical distribution of relevant credit exposures.	Table EU CCyB1 – page 17
440 (1) (b)	Amount of the institution specific countercyclical capital buffer.	Table EU CCyB2 – page 18
441	**Indicators of global systemic importance**	
441 (1)	G-SIIs to disclose the values of indicators used for determining their score.	Not applicable to SIDAC.
442	**Disclosure of exposures to credit risk and dilution risk**	
442 (a)	Disclosure of bank's definitions of past due and impaired.	Section 4.3
442 (b)	Approaches for calculating specific and general Credit risk adjustments.	Section 4.3

CRR Ref	High Level Summary	Company Reference
442 (c)	Amount and quality of performing, nonperforming and forborne exposures for loans, debt securities and off-balance sheet exposures, including impairment, provisions and fair value changes.	Table EU CR1 – page 38 Table EU CQ1 – page 48 Table EU CQ4 – page 40 Table EU CQ5 – page 45
442 (d)	Ageing analysis of accounting past due exposures.	Table EU CQ3 – page 41
442 (e)	Gross carrying amounts of defaulted and non-defaulted exposures, accumulated credit risk adjustments, write-offs and net carrying amounts.	Table EU CR1 – page 38 Table EU CQ4 – page 40 Table EU CQ5 – page 45
442 (f)	Changes in gross defaulted on- and off-balance sheet exposures, including information on opening and closing balances, gross amount reverted to non-defaulted status or subject to a write-off.	Table EU CR2 – page 40
442 (g)	Breakdown of loans and debt securities by residual maturity.	Table EU CR1-A – page 40
443	**Disclosure of encumbered and unencumbered**	
443	Disclosures on encumbered and unencumbered assets.	Section 12
444	**Disclosure of the use of the standardised approach**	
444 (a)	Names of the nominated ECAIs and ECAs, and reasons for any changes in nominations.	Section 4.2
444 (b)	Exposure classes associated with each ECAI or ECA.	Section 4.2
444 (c)	Description of the process for transfer of issuer and issue credit ratings onto items not included in the trading book.	Section 4.2
444 (d)	Mapping of external rating to credit quality steps.	Section 4.2
444 (e)	Exposure value pre- and post-Credit risk mitigation, by credit quality step.	Table EU CR5 – page 43
445	**Disclosure of exposure to market risk**	
445	Disclosure of position risk, large exposures exceeding limits, FX, settlement and commodities risk.	Table EU MR1 – page 54
446	**Disclosure of operational risk management**	
446 (a)	Disclosure of the approaches for the assessment of own funds requirements for operational risk.	Section 6.2
446 (b)	Where institution makes use of it, description of methodology set out in Article 312(2), including relevant internal and external factors being considered.	AMA not applicable to SIDAC
446 (c)	In the case of partial use, the scope and coverage of the different methodologies used.	AMA not applicable to SIDAC
447	**Disclosure of key metrics**	
447 (a)	Composition of own funds and own funds requirements.	Table EU KM1 – page 20
447 (b)	Total risk exposure amount.	
447 (c)	Amount and composition of additional own funds required to be held.	
447 (d)	Combined buffer requirement which institutions are required to hold.	
447 (e)	Leverage ratio and total exposure measure.	
447 (f)	The following information on the liquidity coverage ratio: (i) average(s) of liquidity coverage ratio based on end of month observations over preceding 12 months. (ii) average(s) of total liquid assets, after applying haircuts, in the liquidity buffer. (iii) average liquidity outflows, inflows and net liquidity outflows based on end of the month observations over the preceding 12 months.	
447 (g)	The following information on the net stable funding requirement: (i) NSFR ration and end of each quarter of the relevant period. (ii) Available stable funding at end of each quarter of the relevant period. (iii) Required stable funding at the end of each quarter of the relevant period.	
447 (h)	The own funds and eligible liabilities ratios and their components, numerator and denominator.	
448	**Disclosure of exposure to interest rate risk on positions not held in the trading book**	
448 (1)	Institutions shall disclose the following quantitative and qualitative information:	
448 (1) (a)	Changes in economic value of equity for the current and previous disclosure periods.	Section 5.6
448 (1) (b)	Changes in the net interest income calculated under the two supervisory shock scenarios for the current and previous disclosure periods.	
448 (1) (c)	Description of key modelling and parametric assumptions used to calculate changes in the economic value of equity and net interest income.	
448 (1) (d)	Explanation of the significance of the risk measures, and of any significant variations of those risk measures since the previous disclosure date.	
448 (1) (e)	Descriptions of how institution defines, measures, mitigates and controls interest rate risk of their non-trading book, including:	

CRR Ref	High Level Summary	Company Reference
	(i) description of specific measures used to evaluate changed in economic value of equity and net interest income. (ii) description of key modelling and parametric assumptions used in measurement systems that would differ from common modelling and parametric assumptions for calculating changes in the economic value of equity and net interest income. (iii) description of the interest rate shock scenarios used to estimate interest rate risk. (iv) recognition of the effect of hedges against those interest rate risks. (v) an outline of how often the evaluation of interest rate risk occurs.	
448 (1) (f)	Description of overall risk management and mitigation strategies for those risks.	
448 (1) (g)	Average and longest repricing maturity assigned to non-maturity deposits.	
448 (2)	By way of derogation, the requirements set out in (c) and (e)(i)-(iv) shall not apply to institutions that use the standardised or simplified standardised methodologies.	Section 5.6
449	**Exposure to securitisation positions**	
449 (a)	Description of securitisation and resecuritisation activities, including risk management and investment objectives, role in securitisation and re-securitisation transactions, whether simple, transparent and standardised (STS) securitisations are used, and the extent to which securitisation transactions are used to transfer the credit risk of securitised exposures to third parties with a separate description of the synthetic securitisation risk transfer policy.	Section 12
449 (b)	Type of risks exposed to in securitisation and re-securitisation activities by level of seniority of the relevant securitisation positions.	Section 12
449 (c)	Approaches to calculation of RWA for securitisations mapped to types of exposures.	Section 11
449 (d)	List of SSPEs falling into any of the following categories, with description of types of exposures to SSPEs: (i) SPPEs which acquire exposures originated by the institutions; (ii) SSPEs sponsored by the institutions; (iii) SSPEs and other legal entities for which the institutions provide securitisation-related services; SSPEs included in the institution's regulatory scope of consolidation.	Not applicable to SIDAC
449 (e)	List of any legal entities relating to the institution that have disclosed that they have provided support.	Not applicable to SIDAC
449 (f)	List of any legal entities affiliated with the institution and that invest in securitisations originated by the institution or in securitisation positions issued by SSPEs sponsored by the institution.	Not applicable to SIDAC
449 (g)	Summary of the accounting policies for securitisation activity, including where there is a relevant distinction between securitisation and re-securitisation.	Section 11
449 (h)	The names of ECAIs used for securitisations and the types of exposure for which each agency is used.	Section 11
449 (i)	Where applicable, a description of the internal assessment approach, including structure of the process and the relation between internal assessment and external ratings of the relevant ECAI, the control mechanisms for the internal assessment process including discussion of independence, accountability and internal assessment process review, the exposure types to which the internal assessment process is applied, and the stress factors used for determining credit enhancement levels.	Not applicable to SIDAC
449 (j)	Carrying amount of securitisation exposures for the trading and non-trading books, including information on whether institutions have transferred significant credit risk, for which institutions act as originator, sponsor or investor, separately for traditional and synthetic securitisations, and for STS and non-STS transactions and broken down by type of securitisation exposures.	Table EU SEC1 – page 70
449 (k)	For non-trading book activities, the following information: (i) the aggregate amount of securitisation positions where institution act as originator or sponsor and the associated RWAs and capital requirements, including exposures deducted from own funds or risk weighted at 1250%, both synthetic and traditional and between securitisation and re-securitisation exposures, separately for STS and non-STS positions, and further broken down into risk weight or capital requirement bands; (ii) the aggregate amount of securitisation positions where institution act as investor and the associated RWAs and capital requirements, including exposures deducted from own funds or risk weighted at 1250%, both synthetic and traditional and between securitisation and re-securitisation exposures, separately for STS and non-STS positions, and further broken down into risk weight or capital requirement bands.	Table EU SEC4 – page 70
449 (l)	For exposures securitised by the institution, the amount of exposures in default and the amount of specific credit risk adjustments made by the institution during the current period.	Not applicable to SIDAC
449 (a)	**Disclosure of environmental, social and governance risks (ESG risks)**	Section 9
450	**Remuneration Policy**	
450 (1) (a)	information concerning the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year, including, if applicable, information about the composition and the mandate of a remuneration committee, the external consultant whose services have been used for the determination of the remuneration policy and the role of the relevant stakeholders;.	Section 13
450 (1) (b)	information on link between pay and performance;	
450 (1) (c)	the most important design characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria;	
450 (1) (d)	the ratios between fixed and variable remuneration set in accordance with Article 94(1)(g) of Directive 2013/36/EU;	

CRR Ref	High Level Summary	Company Reference
450 (1) (e)	information on the performance criteria on which the entitlement to shares, options or variable components of remuneration is based;	
450 (1) (f)	the main parameters and rationale for any variable component scheme and any other non-cash benefits;	
450 (1) (g)	aggregate quantitative information on remuneration, broken down by business area;	Table EU REM5 – page 84
450 (1) (h)	aggregate quantitative information on remuneration, broken down by senior management and members of staff whose actions have a material impact on the risk profile of the institution, indicating the following: (i) the amounts of remuneration for the financial year, split into fixed and variable remuneration, and the number of beneficiaries; (ii) the amounts and forms of variable remuneration, split into cash, shares, share linked instruments and other types separately for the part paid upfront and the deferred part; (iii) the amount of deferred remuneration awarded for previous performance periods, split into vested and unvested portions; (iv) the amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments; (v) the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those awards; (vi) the severance payments awarded in previous periods, that have been paid out during the financial year; (vii) the amounts of severance payments awarded during the financial year, split into paid upfront and deferred, the number of beneficiaries of those payments and highest payment that has been awarded to a single person;	Table EU REM1 – page 81 Table EU REM2 – page 82 Table EU REM3 – page 83
450 (1) (i)	the number of individuals being remunerated EUR 1 million or more per financial year, for remuneration between EUR 1 million and EUR 5 million broken down into pay bands of EUR 500 000 and for remuneration of EUR 5 million and above broken down into pay bands of EUR 1 million;	Table EU REM4 – page 84
450 (1) (j)	upon demand from the Member State or competent authority, the total remuneration for each member of the management body or senior management.	Section 13
450 (1) (k)	For the purposes of point (k) of the first subparagraph of this paragraph, institutions that benefit from such a derogation shall indicate whether they benefit from that derogation on the basis of point (a) or (b) of Article 94(3) of Directive 2013/36/EU. They shall also indicate for which of the remuneration principles they apply the derogation(s), the number of staff members that benefit from the derogation(s) and their total remuneration, split into fixed and variable remuneration.	
450 (2)	For large institutions, the quantitative information on the remuneration of institutions' collective management body referred to in this Article shall also be made available to the public, differentiating between executive and non-executive members.	Not applicable to SIDAC
451	**Disclosure of the leverage ratio**	
451 (1)	Institutions that are subject to Part Seven shall disclose the following information regarding their leverage ratio as calculated in accordance with Article 429 and their management of the risk of excessive leverage:	
451 (1) (a)	Leverage ratio,	Table EU LR2-LRCom – page 21
451 (1) (b)	Breakdown of total exposure measure, including reconciliation to financial statements	Table EU LR1-LRSum – page 21 Table EU LR2-LRCom – page 21 Table EU LR3-LRSpl – page 23
451 (1) (c)	Where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a (1) and the adjusted leverage ratio calculated in accordance with Article 429a (7);	Not applicable to SIDAC
451 (1) (d)	Description of the risk management approach to mitigate excessive leverage	Section 2.4
451 (1) (e)	Description of factors that impacted the leverage ratio during the year.	Section 2.4
451 (2)	Public development credit institutions to disclose the leverage ratio without the adjustment to total exposure measure determined per Article 429a(1)(d).	Not applicable to SIDAC
451 (3)	In addition to points (a) and (b), large institutions shall disclose the leverage ratio between breakdown of total exposure measure per Article 429(4) based on averages calculated in accordance with Article 430(7).	Not applicable to SIDAC
451 (a)	**Disclosure of liquidity requirements**	
451 (a) (1)	Institutions shall disclose information on their liquidity coverage ratio, net stable funding ratio and liquidity risk management.	Section 10
451 (a) (2)	Institutions shall disclose the following in relation to their liquidity coverage ratio:	
451 (a) (2) (a)	Average(s) of the liquidity coverage ratio based on end of month observations over the preceding 12 months for each quarter of the disclosure period.	Table EU LIQ1 – page 65
451 (a) (2) (b)	Average(s) of total liquid assets after applying relevant haircuts included in the liquidity buffer based on end of month observations over the preceding 12 months for each quarter of the disclosure period.	Section 10.2 Table EU LIQ1 – page 65
451 (a) (2) (c)	Averages of liquidity outflows, inflows and net liquidity outflows, based on end of month observations over the preceding 12 months for each quarter of the relevant disclosure period.	Table EU LIQ1 – page 65
451 (a) (3)	Institutions shall disclose the following information in relation to the net stable funding ratio (NSFR):	
451(a)(3)(a)	Quarter end figures of the NSFR.	Table EU LIQ2 – page 66

CRR Ref	High Level Summary	Company Reference
451 (a) (3) (b)	Overview of the amount of available stable funding.	Table EU LIQ2 – page 66
451 (a) (3) (c)	Overview of the amount of required stable funding.	Table EU LIQ2 – page 66
451 (a) (4)	Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk.	Section 10.2
452	**Disclosure of use of the IRB approach to Credit risk**	
452 (a)	Permission for use of the IRB approach from authority.	Not applicable to SIDAC
452 (b)	For each exposure class, the percentage of total exposure value of each exposure class subject to the Standardised Approach, as well as the part of each exposure lass subject to a roll out plan. Where institutions have received permission to use own LGDs and conversion factors for their risk weighted exposure calculations, they shall disclose separately the percentage of the total exposure value of each exposure class subject to that permission.	Not applicable to SIDAC
452 (c)	The control mechanisms for rating systems at different stages of the model development, controls and changes, which shall include information on: (i) relationship between the risk management function and the internal audit function. (ii) rating system review. (iii) procedure to ensure the independence of the function in charge of reviewing the models from the functions responsible for the development of the models. (iv) procedure to ensure the accountability of the functions in charge of developing and reviewing the models.	Not applicable to SIDAC
452 (d)	Role of the functions involved in the development, approval and subsequent changes of the credit risk models.	Not applicable to SIDAC
452 (e)	Scope and main content of the reporting related to credit risk models.	Not applicable to SIDAC
452 (f)	Description of the internal ratings process by exposure class, including the number of ley models used and a brief discussion of the main differences between models within the same portfolio, covering: (i) definitions, methods and data for estimation and validation of PD, including information on how PDs are estimated for low default portfolios, whether there are regulatory floors and the drivers for differences observed between PD and actual default rates at least for the last three periods. (ii) where applicable, the definitions, methods and data for estimation and validation of LGD, how LGDs are estimated for low default portfolio and the time lapse between the default event and the closure of the exposure. (iii) where applicable, the definitions, methods and data for estimation and validation of conversion factors, including assumptions employed in the derivation of those variables.	Not applicable to SIDAC
452 (g)	As applicable, the following information in relation to exposure classes: (i) gross on-balance sheet exposure. (ii) off-balance sheet exposure prior to the relevant conversion factor. (iii) exposure after applying the relevant conversion factor and credit risk mitigation. (iv) any model, parameter or input relevant for the understanding of the risk weighting and the resulting exposure amounts disclosed across enough obligor grades to allow for a meaningful differentiation of credit risk. (v) separately for those exposure classes in relation to which institutions have received permission to use own LGDs and conversion factors for the calculation of risk weighted exposure amounts, and for exposures for which institutions do not use such estimates, the values referred to in pints (i) - (iv) subject to that permission.	Not applicable to SIDAC
452 (h)	Estimates of PDs against the actual default rate for each exposure class over a longer period, with separate disclosure of the PD range, the external rating equivalent, the weighted average and arithmetic average PD, the number of obligors at the end of the previous year and of the year under review, the number of defaulted obligors, including the new defaulted obligors, and the annual average historical default rate.	Not applicable to SIDAC
453	**Use of Credit risk mitigation techniques**	
453 (a)	Core features of policies and processes for use of on- and off-balance sheet netting.	Not applicable to SIDAC
453 (b)	Core features of policies and processes for how collateral valuation is managed.	Section 4.4
453 (c)	Description of types of collateral used to mitigate credit risk.	Section 4.4
453 (d)	Types of guarantors and credit derivative counterparty, and their creditworthiness.	Section 4.4
453 (e)	Disclosure of market or credit risk concentrations within risk mitigation exposures.	Section 4.4 Section 5 Section 11
453 (f)	For exposures under either the Standardised or Foundation IRB approach, disclose the exposure value not covered by eligible collateral and the exposure value covered by eligible collateral.	Table EU CR3 – page 45
453 (g)	Corresponding conversion factor and credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effects.	Table EU CR4 – page 47
453 (h)	For institutions using the Standardised approach, the on and off-balance sheet exposure values before and after conversion factors and associated credit risk mitigation.	
453 (i)	For institutions using the Standardised approach, the risk weighted exposures and ratio between exposure value and value after applying conversion factor and credit risk mitigation.	

CRR Ref	High Level Summary	Company Reference
453 (j)	For institutions using the IRB approach, the risk weighted exposures amount before and after the credit risk mitigation impact of credit derivatives. Where institutions used their own LGDs and conversion factors, this should be disclosed separately.	Not applicable to SIDAC
454	**Use of the Advanced Measurement Approaches to operational risk**	
454	Description of the use of insurance or other risk transfer mechanisms to mitigate operational risk.	Not applicable to SIDAC
455	**Use of internal market risk models**	
455 (a)	Institutions calculating their capital requirements in accordance with Article 363 shall disclose the following	Not applicable to SIDAC
455 (a) (i)	Characteristics of the market risk models.	Not applicable to SIDAC
455 (a) (ii)	Methodology and description of comprehensive risk measure and incremental risk charge.	Not applicable to SIDAC
455 (a) (iii)	Stress tests applied to the portfolios.	Not applicable to SIDAC
455 (a) (iv)	Methodology for back-testing and validating the models.	Not applicable to SIDAC
455 (b)	Scope of permission for use of the models.	Not applicable to SIDAC
455 (c)	Policies and processes to determine which exposures are to be included in the trading book, and to comply with prudential valuation requirements.	Not applicable to SIDAC
455 (d)	the highest, the lowest and the mean over the reporting period and as per the period end, of:	Not applicable to SIDAC
455 (d) (i)	daily value-at-risk measures	Not applicable to SIDAC
455 (d) (ii)	stressed value-at-risk measures	Not applicable to SIDAC
455 (d) (iii)	incremental default and migration risk and for the specific risk of the correlation trading portfolio	Not applicable to SIDAC
455 (e)	The elements of the own fund calculation.	Not applicable to SIDAC
455 (f)	Weighted average liquidity horizons of portfolios covered by models.	Not applicable to SIDAC
455 (g)	Comparison of end-of-day VaR measures compared with one-day changes in portfolio’s value.	Not applicable to SIDAC

16 Appendix 2 – Excluded Templates

Template	Name	Reason for exclusion
EU LI3	Outline of the differences in the scopes of consolidation (entity by entity)	SIDAC does not prepare consolidated accounts.
EU PV1	Prudent valuation adjustments (PVA)	SIDAC does not use core approach for prudential valuation adjustments.
EU INS1	Insurance participations	Applicable to insurance participations only.
EU INS2	Financial conglomerates information on own funds and capital adequacy ratio	Applicable to financial conglomerates only.
EU CR2a	Changes in the stock of non-performing loans and advances and related net accumulated recoveries	Applicable to certain large institutions only.
EU CR6	IRB approach – Credit risk exposures by exposure class and PD range	SIDAC does not use the IRB approach.
EU CR6-A	Scope of the use of IRB and SA approaches	
EU CR7	IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques	
EU CR7-A	IRB approach – Disclosure of the extent of the use of CRM techniques	
EU CR8	RWEA flow statements of credit risk exposures under the IRB approach	
EU CR9	IRB approach – Back-testing of PD per exposure class (fixed PD scale)	
EU CR9.1	Back-testing of PD per exposure class (only for PD estimates according to Article 180(1)(f))	
EU CR10	Specialised lending and equity exposures under the simple risk weighted approach	
EU CQ2	Quality of forbearance	Applicable to certain large institutions only.
EU CQ6	Collateral valuation - loans and advances	Applicable to certain large institutions only.
EU CQ7	Collateral obtained by taking possession and execution processes	There was no activity to report in the period.
EU CQ8	Collateral obtained by taking possession and execution processes – vintage breakdown	Applicable to certain large institutions only.
EU CCR6	Credit derivatives exposures	SIDAC did not hold reportable positions in the period.
EU CCR7	RWEA flow statements of CCR exposures under the IMM	SIDAC does not use the Internal Model Method for CCR.
EU SEC2	Securitisation exposures in the trading book	SIDAC does not hold securitisations in the trading book.
EU SEC3	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor	SIDAC does not originate or sponsor securitisations.
EU SEC5	Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	SIDAC does not securitise exposures.
EU MR2-A	Market risk under the internal Model Approach (IMA)	SIDAC does not use the internal model approach.
EU MR2-B	RWA flow statements of market risk exposures under the IMA	
EU MR3	IMA values for trading portfolios	
EU MR4	Comparison of VaR estimates with gains/losses	

17 Appendix 3 – Geographical Disclosures

A threshold of 5% of the total gross carrying / nominal amount has been used as the materiality threshold for disclosure of individual jurisdictions in template EU CQ4 in section 4.3 above.

As such the immaterial jurisdictions which are reported in the ‘Other countries’ rows are as follows:

Ireland, Belgium, Switzerland, Finland, Jersey, Norway, Sweden, United Kingdom, Bermuda, Bahamas, Canada, Cayman Islands, Japan, Liberia Marshall Islands.

Also included in ‘Other countries’ are exposure to supranational organisations, as per EBA guidance.

18 Appendix 4 – Main features of the Company's capital instruments

The table below shows the main features of the Company's capital instruments issued.

Table 48 – EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments (Article 437 (b) & (c))

		Instruments used in meeting own funds and eligible liabilities requirements				
1	Issuer	Scotiabank (Ireland) DAC	Scotiabank (Ireland) DAC	Scotiabank (Ireland) DAC	Scotiabank (Ireland) DAC	Scotiabank (Ireland) DAC
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A	N/A	N/A	N/A
EU-2a	Public or private placement	Private	Private	Private	Private	Private
3	Governing law(s) of the instrument	Irish law	Irish law	Irish law	Irish law	Irish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A	N/A	N/A
	Regulatory treatment					
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Tier 2	Tier 2
5	Post-transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo	Solo	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares	Preference Shares	Preference Shares
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	5,000	15,000	20,000	20,000	20,000
9	Nominal amount of instrument	5,000	15,000	20,000	20,000	20,000
EU-9a	Issue price	US$ 1.00	US$ 1.00	US$ 1.00	US$ 1.00	US$ 1.00
EU-9b	Redemption price	N/A	N/A	N/A	US$ 1.00	US$ 1.00
10	Accounting classification	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity	Shareholders' equity
11	Original date of issuance	31 Aug 1989	06 Jul 1990	07 Jul 1992	06 Jul 1990	07 Jul 1992
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual
13	Original maturity date	No maturity	No maturity	No maturity	No maturity	No maturity
14	Issuer call subject to prior supervisory approval	N/A	N/A	N/A	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A
	Coupons / dividends					
17	Fixed or floating dividend/coupon	N/A	N/A	N/A	Floating	Floating
18	Coupon rate and any related index	N/A	N/A	N/A	6-month LIBOR	6-month LIBOR
19	Existence of a dividend stopper	No	No	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Fully discretionary	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Fully discretionary	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	N/A	N/A	N/A	N/A	N/A

22	Noncumulative or cumulative	N/A	N/A	N/A	Noncumulative	Noncumulative
23	Convertible or non-convertible	N/A	N/A	N/A	Convertible	Convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	Fully or partially	Fully or partially
26	If convertible, conversion rate	N/A	N/A	N/A	1:1	1:1
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	At the option of the holders	At the option of the holders
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	Ordinary shares	Ordinary shares
30	Write-down features	N/A	N/A	N/A	N/A	N/A
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A	N/A	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	1	1	2	2
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Most junior. Instrument type immediately senior: Tier 2	Most junior. Instrument type immediately senior: Tier 2	Most junior. Instrument type immediately senior: Tier 2	Senior to Tier 1 instruments. Junior to all unsubordinated creditors	Senior to Tier 1 instruments. Junior to all unsubordinated creditors
36	Non-compliant transitioned features	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A	N/A	N/A	N/A	N/A