

# Annual Report 2024



**Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A.**  
A member of MUFG, a global financial group



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## MESSAGE FROM MANAGEMENT

Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. ("MIBL") is a member of Mitsubishi UFJ Financial Group (MUFG) and runs asset servicing businesses under the global brand of MUFG Investor Services.

As we entered 2024, we were proud to commemorate our 50th anniversary of being present in Luxembourg, a notable milestone event for both MUFG and Luxembourg, which has been recognised locally by the Ministry of Finance. I would like to extend my heartfelt gratitude to our clients, partners and stakeholders, who have supported our efforts over these 50 years. It is your steadfast encouragement and partnership, that have driven our journey over the half a century and enabled us to reach this significant milestone.

Over the past five decades, MIBL has consistently expanded the range of product and services, to meet the needs and of our clients and business partners, providing premium services globally and in every time zone. Today, MIBL provides not only custody and banking solutions, but also depositary, fund administration and ancillary

services in strategic collaborations with MUFG group companies, both in Europe and globally. Thanks to ongoing support from our customers, stakeholders and, combined with the service excellence delivered by our staff, MIBL has recorded its highest-ever profit in 2024.

We have now taken a new step in an exciting journey toward the next 50 years of our business. We are confident that we can consistently deliver services of the highest quality and exceed our clients' expectations, by responding swiftly and flexibly to evolving needs and challenges. I wish you continued success and thank you for being an integral part of our successful journey in the next 50 years.

**Kosuke Nakayamada**  
*Chief Executive Officer*

May 31, 2025

## CORPORATE SOCIAL RESPONSIBILITY (CSR)

### Overview

Our commitment to environmental, social and governance initiatives are among the most vital concerns, to remain the most trusted financial institution in the global market. Especially as a financial institution based in Luxembourg, the heart of Europe, we recognise that our efforts in creating a better society and future, could ultimately enhance our long-term competitiveness. We recognise it as our mission, to engage in social and environmental activities, contributing towards the realisation of a sustainable society.

### Environment

With regards to the Environment, MIBL endeavours to minimise global warming impact, by engaging and cooperating with its customers, counterparties, and outsourcing service providers in transition towards a greener and more sustainable future. As part of the goal of net-zero GHG emissions in its own operations by 2030 on an MUFG group basis, we regularly monitor our energy consumption and sources 100% of its electricity from renewable sources. MIBL also established its Climate Risk Framework in accordance with circular 21/773, and regularly monitors climate risk KRIs.

Our efforts also extend to the campaigns promoting energy conservation and the advancement of recycling & waste reduction, to reinforce our responsibility towards the environment. We conduct awareness campaigns to reduce the waste and recycling, including monthly reminder of "Paperless day" for employees to reduce paper consumption and provide environmental training programs for employees. In 2024, MIBL was



recognized with SuperDrecksKëscht® Label, for our commitment to sustainable practices in waste management.

### Social

In 2024, we have actively engaged in sustainable practices that also fulfil our social mission. In 2024, we participated in community initiatives, including supporting the Foundation Cancer through the participation in the Business Run and the participation in the International Bazaar's Japanese stand, where proceeds are contributed to humanitarian projects in developing countries. Furthermore, we donated to the Fondatioun Kriisbskrank Kanner through our internal Xmas raffle event.





MUFG accords high priority to promoting Diversity & Inclusion for our employees. We believe that our workplace, where individuality and difference are embraced and respected, not only empowers all employees to realise and expand their talents, but also develops the quality and competitiveness of our services. To promote a healthy workplace, MIBL is committed to enhancing the work-life balance and providing a variety of training programs to encourage all employees to develop their skills. In 2024, under the purpose of creating a comfortable and productive work environment for employees, MIBL created new meeting rooms with more pleasant environment. MIBL also created a Quiet Room to allow employees to unwind and recharge during the workday, should the need arise.

## Governance

The corporate governance is the foundation of our business, providing our customers with regulated, robust, and responsible services. We ensure that our corporate governance policies are established in accordance with both of Luxembourg regulations and MUFG Group policy. For the details of our governance structure, please refer to CORPORATE GOVERNANCE STRUCTURES.





## PERFORMANCE HIGHLIGHT

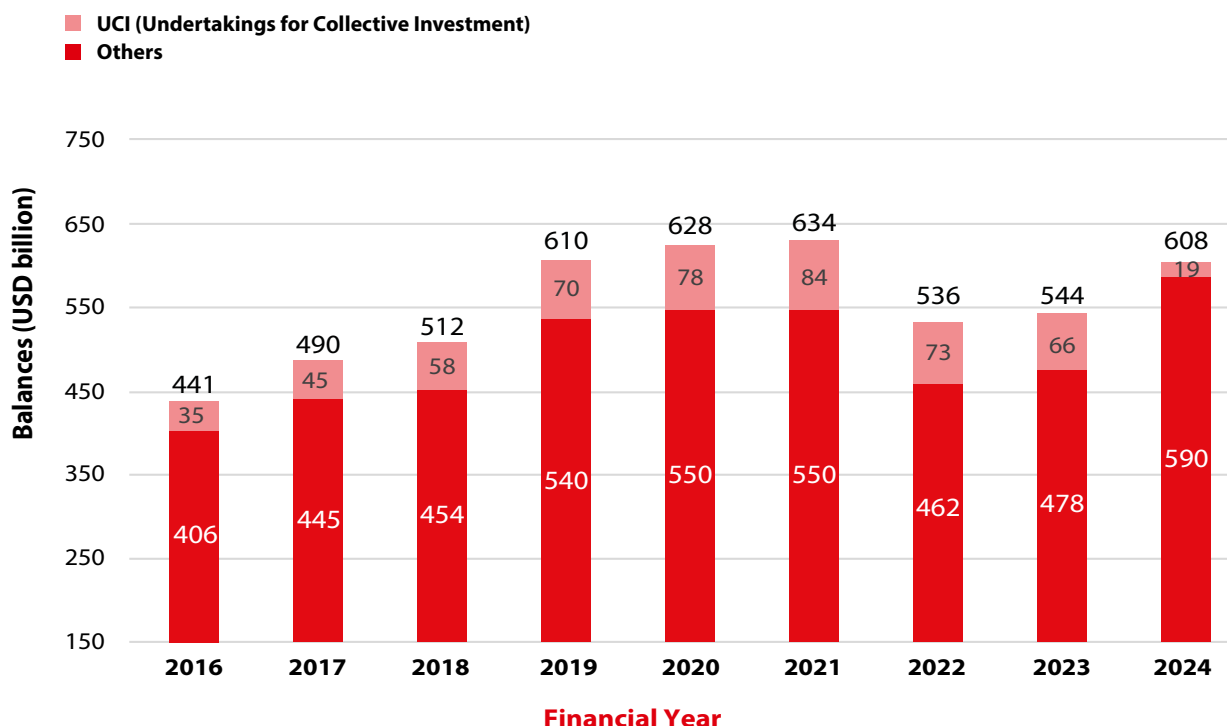
With regards to our Custody Business, MIBL has engaged in the enhancement of our service quality and competitiveness throughout the year. The Assets under Custody has achieved the significant growth to USD 608 billion as of December 31, 2024, compared to USD 544 billion as of end of 2023 (+11.8%). This is primarily due to the growth in the assets of Japanese Investment Trust Funds and the upward trend in global security prices during the year.

As for the Fund Administration business, the Net Asset Value was USD 11.4 billion as of December 31, 2024, and the associated revenue has steadily increased to USD

5.3 million through collaboration with MUFG Group entities. MIBL has been focusing on the enhancement of sales support and onboarding operations in collaboration with our strategic partners.

In other business areas, MIBL has been dedicated to expanding its Depositary Services, implementing the new Depositary system in 2024. The revenue for the other services, such as Depositary Service, Bank Account Services, Fund Order Desk and Fiduciary Services, was USD 11.3 million as of end of 2024.

### Custody Assets of MIBL





# FINANCIAL HIGHLIGHT

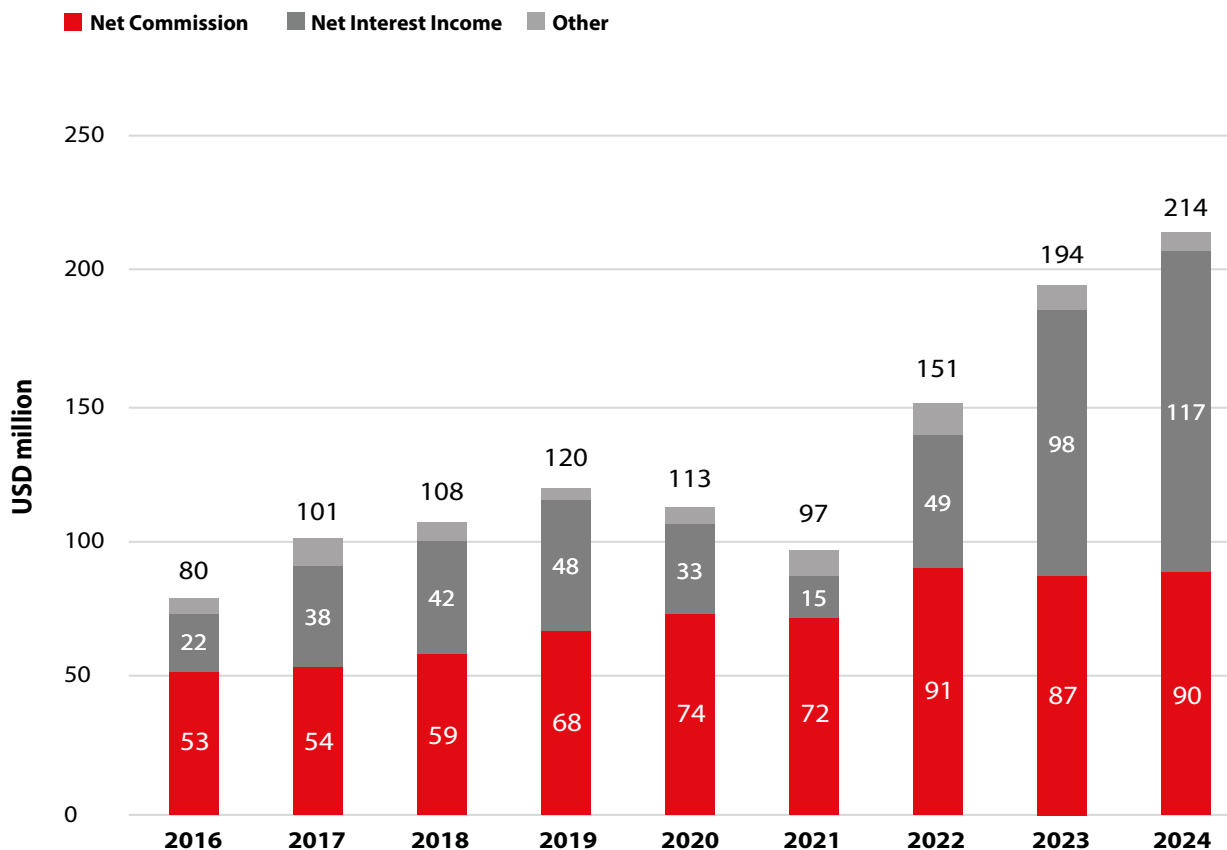
For the year ended December 31, 2024, the operating income recorded the highest profit; USD 214.1 million, an increase of USD 19.7 million compared to USD 194.4 million for the previous fiscal year (+10.1%).

This increase is mainly due to the high performance of Net Interest Income (NII), which took advantage of the high interest rate in the market in 2024. The Net interest income reached USD 117.2 million, which is USD 19.5 million higher than the previous year (+19.9%). The Net commission also increased by USD 2.3 million, reaching

USD 89.6 million (+ 2.6%), due to significant growth in Assets under Custody. On the other hand, MIBL has successfully controlled the General Administrative expenses, amounting to USD 58.4 million, a reduction of USD 1.7 million, compared to the previous year (-2.9%).

As a whole, the net operating profit before taxes also reached a record high of USD 152.6 million in 2024, which is USD 21.3 million higher than in December 2023 (+16.2%).

## Total Operating Income





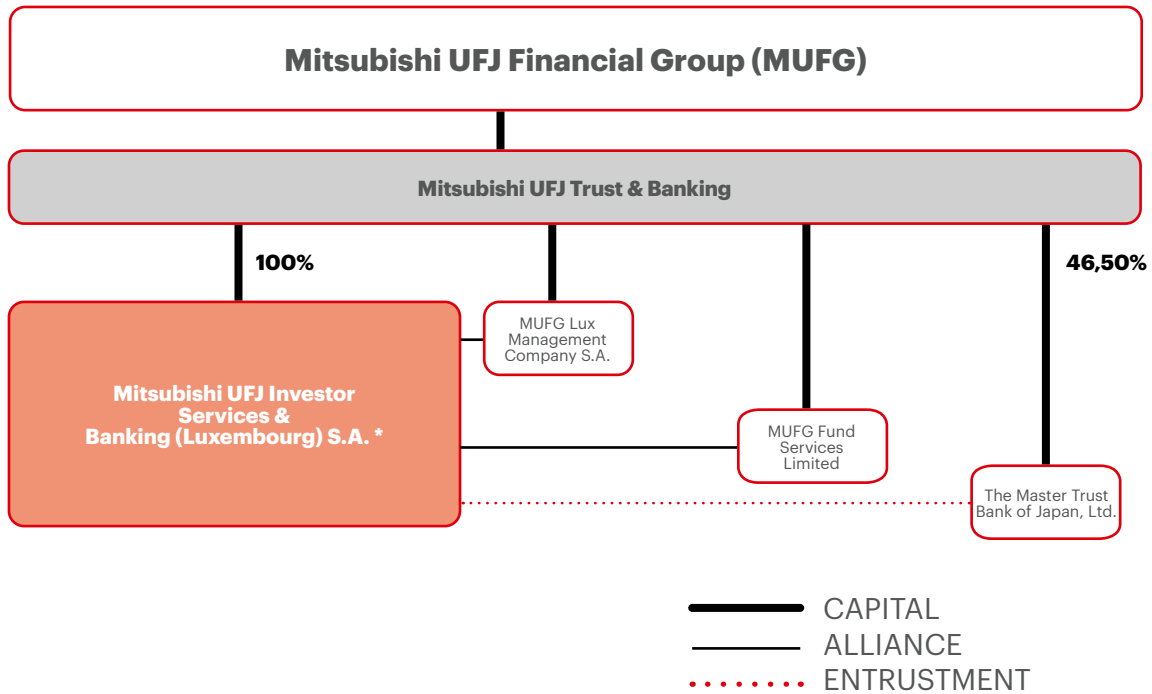


## PROFILE

Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. (MIBL) is a member of the MUFG Investor Services, which is a global brand of Mitsubishi UFJ Financial Group (MUFG), one of the largest financial groups worldwide.

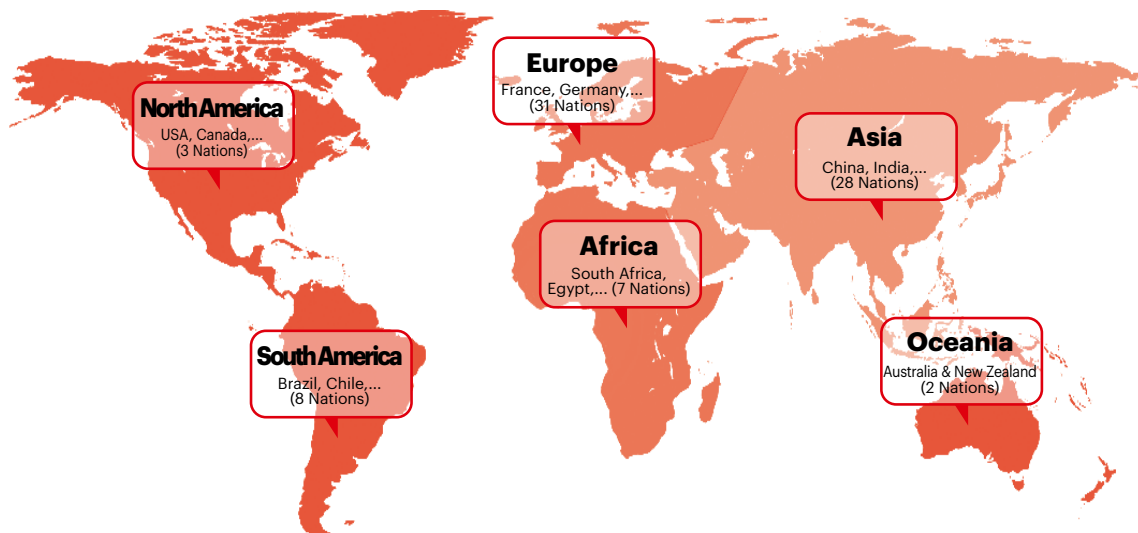
For 50 years, MIBL has provided a wide range of services to institutional investors, including:

- 1. Global Custody Services**
- 2. Depositary Services**
- 3. Investment Funds Administration**
- 4. Fiduciary and Trust Administration**
- 5. Other direct or indirect related services (Cash Management, Foreign Exchange, Bank Account service, Fund Order desk for funds and Listing on the Stock Exchange etc.)**



\* Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. provides Investor Services business to Mitsubishi UFJ Trust & Banking and has been identified as CSS Provider for Mitsubishi UFJ Trust & Banking.

## MIBL Global Market Coverage





## BOARD OF DIRECTORS

### CHAIRMAN

**Jun KAWAKUBO**, Tokyo  
(since March 1, 2022)

General Manager, Investor Services Business Division  
Mitsubishi UFJ Trust and Banking Corporation  
4-5, Marunouchi 1-chome, Chiyoda-ku, Tokyo 100-8212,  
JAPAN

### DIRECTORS

**Yoshinobu HIROTA**, Luxembourg  
(until March 27, 2024)

Chief Executive Officer  
Mitsubishi UFJ Investor Services & Banking  
(Luxembourg) S.A.  
287-289, Route d'Arlon - L-1150 Luxembourg

**Kosuke NAKAYAMADA**, Luxembourg  
(since March 28, 2024)

Chief Executive Officer  
Mitsubishi UFJ Investor Services & Banking  
(Luxembourg) S.A.  
287-289, Route d'Arlon - L-1150 Luxembourg

**Luc DUARTE**, Luxembourg  
(since June 4, 2021)

Independent Director  
Authorised Manager (Administrateur délégué)  
International Fund Services & Asset Management S.A.  
25, rue Edmond Reuter - L-5326 Contern

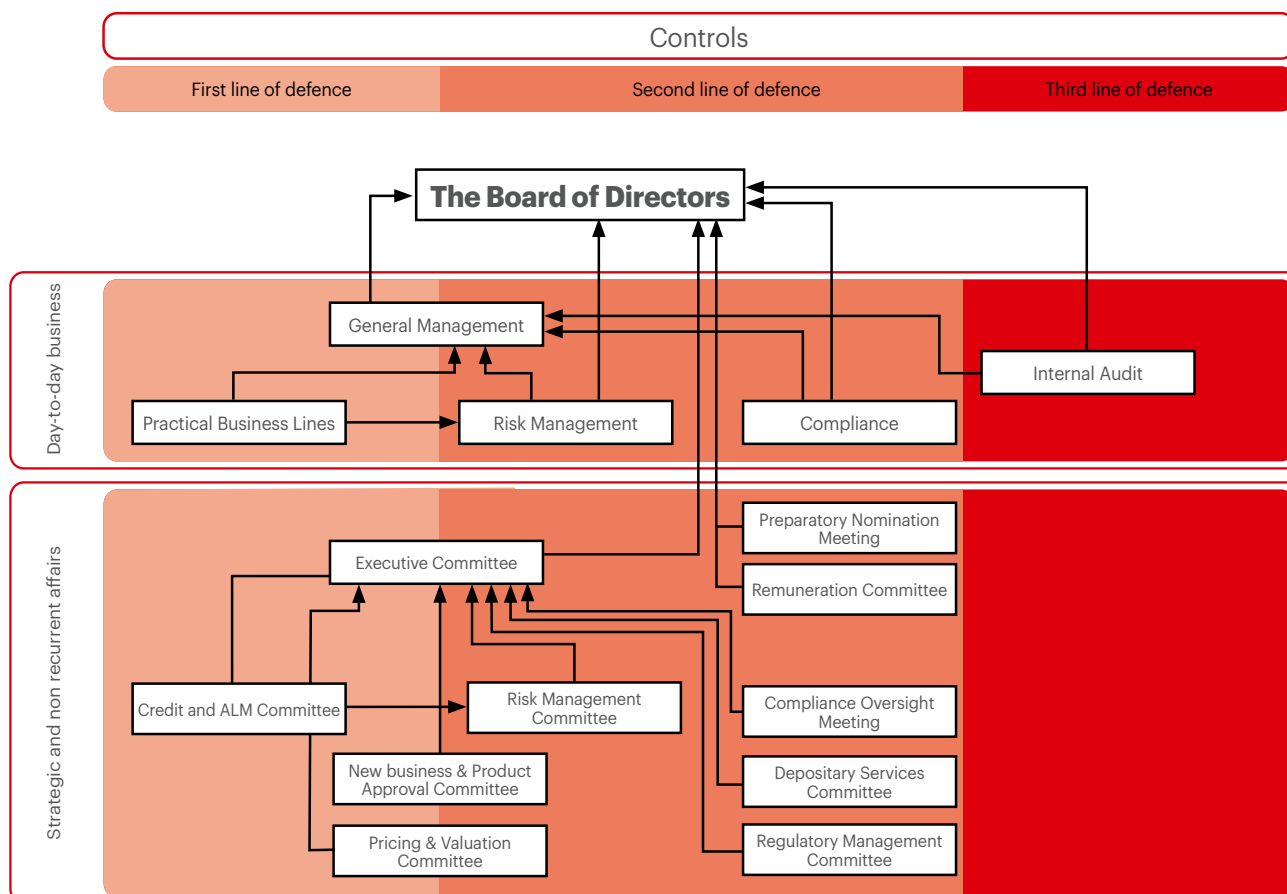
**Ray P. WINTERS**, London  
(since February 28, 2014)

Managing Director & Chief Executive  
Novate Global Markets Limited  
24 Lombard Street, London EC3V 9AJ, UK

(As of December 2024)



# CORPORATE GOVERNANCE STRUCTURES



## FREQUENCY OF THE MEETING

Board of Directors:	Quarterly
Executive Committee:	Monthly
Credit and ALM Committee:	Monthly
New business & Product Approval Committee:	Ad-hoc basis
Pricing & Valuation Committee:	Monthly
Risk Management Committee:	Monthly
Compliance Oversight Meeting:	Monthly
Depository Services Committee:	Monthly
Preparatory Nomination Meeting:	Ad-hoc basis
Regulatory Management Committee:	Monthly
Remuneration Committee:	Yearly



## CORPORATE GOVERNANCE STRUCTURES

The General Meeting of Shareholders is the highest decision-making body in MIBL. By adopting the articles of incorporation, the shareholders have agreed to transfer the most extensive administrative powers, including the power to delegate to the Board of Directors, retaining only the powers reserved by law for the shareholders meeting.

The Board of Directors has, in turn, delegated the day-to-day management of the company to the General Management ("Authorized Management"), presently composed of one Chief Executive Officer and two Deputy Chief Executive Officers. General Management has organised MIBL into business lines to meet legal requirements and to accomplish MIBL's day-to-day objectives. The members of the General Management shall supervise the business lines and internal control lines on the day-to-day management, through internal written policies, procedures, all the strategies and guiding principles, laid down by the Board of Directors. To ensure the prudent and strong internal control and business management, the Executive Committee is established as a management committee and shall supervise the strategic and non-recurring affairs, in long-term financial interests of MIBL, under the supervision of and reporting obligation to the Board of Directors. In addition, MIBL's committee structure is established with clear committees' subjects to be treated, duties and reporting lines to retain robust corporate governance.

MIBL's operations are governed by a three-level control framework. The first line of defense occurs within the business lines themselves, which bear the primary responsibility for any action undertaken. Consequently, they have been organized in such a manner that each action is carefully checked before being released. The second line is formed by the support functions, including the Compliance and the Risk Control Functions.

With regards to the Risk Control in MIBL, the Risk Management Department is responsible for monitoring and reporting on the day-to-day risk management. The Risk Management Committee is also established to review, discuss, and approve the strategic and non-recurring affairs. Their purpose is to provide oversight for the following areas:

- Risk Appetite Indicators
- Counterparty Credit Risk Management
- Market Risk Management
- Outsourcing Risk Management
- Climate Risk Management
- Operational Risk Management
- Business Continuity Management
- Information Security Management
- Credit Management (via the Credit and ALM Committee)
- Asset & Liability Management and Liquidity Risk Management
- the approval of new business and new products (via the New Business & Product Approval Committee)

The regular Risk Management Report is submitted for the review and approval of the Board of Directors, each quarter.

Compliance related topics are discussed within two different committees:

- Regulatory Management Committee, whose primary responsibility is to review and assess potential impacts and follow up on regulatory changes that are impacting MIBL
- Compliance Oversight Meeting, where all compliance activities and issues for MIBL (including MIBL Dublin branch) are covered

The regular Compliance Report is submitted for the review and approval of the Board of Directors, each quarter.

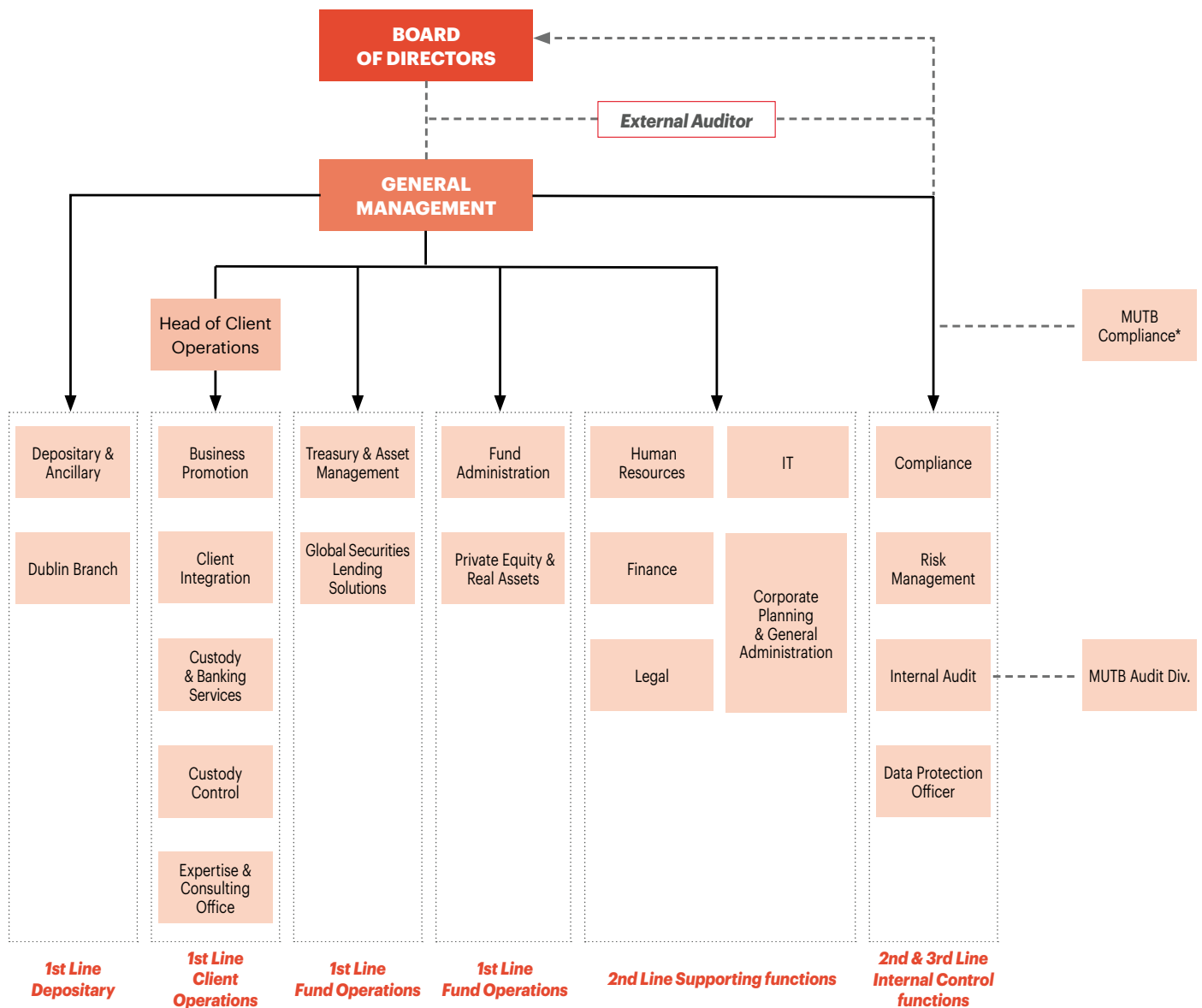
The Chief Risk Officer and Chief Compliance Officer have direct access to the MIBL Board of Directors.

The third level consists of the Internal Audit function which, in turn, provides an independent, objective, and critical review of the first two lines of defense.

The third level of control, in cooperation with General Management, ensures the soundness and appropriateness of MIBL's activity. It has the authority to report directly, in case of need or if so required, to the Board of Directors and to the regulatory authorities and external auditors, in addition to the Head Office.



# ORGANIZATION CHART



\* Mitsubishi UFJ Trust and Banking Corporation (Parent)

\* As of December 2024



# ANNUAL ACCOUNTS

## MANAGEMENT REPORT

December 31, 2024

### Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. (the “Bank”) Financial Results 2024

#### Profit and Loss Account

- For the fiscal year ending December 31, 2024, the company reported an operating income of USD 214.135 thousand, compared to USD 194.429 thousand for the previous fiscal year.
- Net operating profit before income taxes in 2024 is USD 152.617 thousand, marking USD 21.313 thousand increase from the USD 131.304 thousand recorded in December 2023. The summary is as follows.

Profit and Loss Account	2024	2023	Comparison	%
<b>Operating income</b>	214.135	194.429	+19.706	+10.14%
- of which Net Commission	89.648	87.397	+2.251	+2.58%
- of which Net Interest income	117.236	97.772	+19.464	+19.91%
- of which Other	7.251	9.260	-2.009	-21.70%
<b>General administrative expenses</b>	58.406	60.136	-1.730	-2.88%
<b>Other Expenses</b>	4.860	2.520	+2.340	+92.85%
<b>Net operating profit before income taxes</b>	152.617	131.304	+21.313	+16.23%
<b>Profit for the financial year after taxes</b>	114.747	97.883	+16.864	+17.23%

#### Balance sheet

- As of December 31, 2024, the total balance sheet amounted to USD 7.862 million. The Return on Assets (ROA) ratio was 1.46% as of December 31, 2024.

(USD thousand)	2024	2023	Comparison
Total Asset	7.891.504	6.638.031	+1.253.472

#### Risk Indicators

The Liquidity Coverage Ratio (LCR) introduced by the regulation (EU) No 575/2013 of the European Parliament and the Solvency Ratio significantly exceed the statutory minimum requirements.

- Liquidity Coverage Ratio (LCR) 156.41%
- Solvency Ratio 35.21%



## Proposal regarding Profit Allocation

The Board of Directors will present a proposal regarding the allocation of the profit amounting to USD 126.128.764 at the Ordinary Meeting of Shareholders. The amount consists of the result brought forward of USD 470.846, the available reserve for Net Worth Tax from the year 2020 of USD 10.911.000, and the net profit of the financial year ended December 31, 2024, of USD 114.746.918. The allocation of this amount will be as follows:

<b>Allocation to other reserve (Net Worth Tax 2024)</b>	USD	13.601.000
<b>Allocation to free reserve</b>	USD	112.000.000
<b>Allocation to legal reserve</b>	USD	0,00
<b>Dividends</b>		
Class A Shares dividend	USD	0,00
Class B Shares dividend	USD	0,00
<b>Result brought forward</b>	USD	527.764
<b>Total</b>	<b>USD</b>	<b>126.128.764</b>

As of December 31, 2024, the Bank had not acquired any of its own shares.

## Business Circumstances in 2024

The year 2024 was mainly characterized by a shift in interest rate policy in the United States, Europe, and Japan. The robust economies of the United States and Europe served as the foundation for a slower start of interest rate cuts in USD and EUR, which created a favourable opportunity for cash investment in the Bank. The European Central Bank (ECB) commenced its rate cut in June 2024, followed by the Federal Reserve Bank (FED) in

September, leading the Net Interest Income to a peak at the end of 2024. A gradual decrease is expected in 2025. In contrast, the Bank of Japan finally lifted its long-standing negative interest rate policy in March 2024 and subsequently raised interest rates to 0.25% in July 2024, which had a positive impact on Interest Income in JPY.

With regard to the environment of Custody business, the Japanese government has renewed its NISA ("Nippon Individual Savings Account") program, which was initiated in 2014 as a tax-free program for small investments by individuals, as "New NISA" since January 2024. This renewed program boosted the cash held by households to flow from saving accounts to investment trust funds. In recent years, however, the downward pressure on Custody fees has been increasing in Japan, driven by a growing awareness of the impact of fees on long-term investment returns, along with increased competition among the Custodian Banks. As a result, many firms are required to explore further cost reduction and seek more competitive service offerings to attract and retain the clients.

## Business Achievement in 2024

From a financial perspective, the Bank has achieved its highest revenue to date, primarily due to the high performance of Net Interest Income (NII). NII revenue reached USD 117.236 thousand, a USD 19.464 thousand increase compared to 2023, due to the strategic use of market circumstances and higher interest rates in USD and EUR.

The Custody business also saw significant growth, with Assets under Custody rising from USD 544 billion as of December 31, 2023, to USD 608 billion as of December 31, 2024. The increase is primarily attributed to the



increase in the asset of Japanese Investment Trust Funds and the upward trend in global security prices during the year. In terms of Net Commission, it was USD 2.251 thousand higher than in 2023.

Although the personnel expense has increased by USD 1.959 thousand due to the expansion of the workforce and indexation, general expense has been effectively controlled, and it was USD 1.730 thousand below the figure for the previous year. Net operating profit before income taxes in 2024 (USD 152.617 thousand) has exceeded the previous year's figures by USD 21.313 thousand, marking this the highest profit recorded by the Bank to date.

### **Business Plan for 2025**

With regard to the Custody business, the Bank continues to strengthen the quality and competitiveness of its Global Custody operations. The Bank will continue to be committed to strengthening the agility to response to any issues that affect clients, preventing potential incidents within the Bank, streamlining business processes, and implementing measures that contribute to improving service quality and excellence. This will allow the Bank to establish and maintain relationships with both new and existing clients in Japan.

The Bank also accelerates business development for non-Japanese clients, enhancing sales support and onboarding operations and strengthening client KYC processes, in collaboration with our strategic partner (MUFG Fund Services). In order to expand its market presence in Europe and attract a greater number of non-Japanese clients, the Bank is focusing on expanding its Depositary Services, particularly in Alternative Investment Funds such as Private Equity, Infrastructure, and other alternative investment

strategies in both Luxembourg and Ireland domiciled Funds.

Regarding the Net Interest Income, the Bank anticipates a gradual decrease due to the possible decline in interest rates, especially for USD and EUR. However, the Bank continues to explore opportunities to maximise profit through diversification of its investment revenue sources.

### **Risk Management (Risk Control Function)**

The Bank's primary business lines remain unchanged: Custody, Fund Administration, and Ancillary Services. Although the Bank's primary client base remains centered in Japan, it is focusing on expanding its global client base to include non-Japanese clients.

Given this environment, the Management's major objective is, in addition to monitoring and controlling the Bank's business-related risks (including, but not limited to, credit, market, liquidity, operational, outsourcing and climate risks), to proactively anticipate, prevent, or mitigate these risks before they materialize. To accomplish these objectives, the Risk Management Department is continuously strengthening its existing controls and implementing enhanced measures.

The Bank's comprehensive risk categories, which are of the utmost relevance, include the following:

#### Credit Risk

The Risk Control Function is responsible for the monitoring counterparty and credit risk on a daily basis through the monitoring of exposures towards the Bank's counterparties. A thorough risk management process is in place to monitor limit breaches, apply appropriate corrective measures when breaches occur, and escalate these events, when necessary, to Management or to the Regulator.



### Funding Liquidity Risk

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The Treasury Department is responsible for controlling and managing all funding operations, while Risk Control is responsible for daily monitoring to ensure compliance with internal standards for appropriate control and management of Funding Liquidity Risk. In particular, Risk Control monitors the Liquidity Coverage Ratio (LCR: internal minimum level for the LCR is 120% , regulatory level is 100%), Net Stable Funding Ratio (NSFR: internal minimum threshold 120%, regulatory 100%) and Leverage ratio (internal minimum threshold 3.5%, regulatory 3%) on a daily basis. In addition, the Minimum Requirement of Own Funds & Eligible Liabilities (MREL TREA: 8%, MREL LRE 3%) is applicable to the Bank from 2024.

### Market Risk

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As of December 31, 2024, the Bank had minimal exposure to market risk. There were no speculative market positions held or proprietary trading conducted by the Bank. In addition, the Bank carefully oversaw its FX Risk and Interest Rate Risk by calculating the assets and liabilities duration gap, from both the mark-to-market perspective, and an earnings point of view.

### Operational Risk

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Operational Risk is a risk category to which the Bank dedicates a higher degree of focus on. It can be defined as the risk of an inadequate or failed process at the Bank. Depositary risks are treated in the context of Operational Risks to ensure the Bank's capabilities and accuracy to meet its Depositary duties. The risk is monitored on a regular basis, and it was a major part of the Bank's Risk Management plans in 2024, 2025 and 2026. The following are some of the key Operational Risks the bank is currently facing:

### Operations Risk

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The Bank ensures a detailed focus on the effectiveness of its Operations Risk Management, by using the Operational Risk Self-Assessment (ORSA), the Operational Risk Quality Assessment (ORQA) approach to enhance the quality of the Operational Risk Management, and other tools. In addition, the Bank incorporates the impacts of external changes (e.g. new regulations or increased complexity to its business due to client requests) in the Bank's risk policies and procedures.

### Settlement Risk

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The primary concern is the risk of non-receipt of funds due from counterparties, or other operational risks associated with market settlements. As an example, internal system developments have significantly improved the performance of the Bank's automated intra-day cash reconciliation.

### Information Security

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The main objective of the Information Security Risk Management is to assess the Bank's risk exposure to the mishandling of its (confidential, client and personal) information and therefore ensure that its efforts to mitigate this risk are properly targeting potential vulnerabilities. The Bank has established various controls in line with the applicable regulations, standards, and best practices. It has trained its staff and is periodically testing the effectiveness of information security measures. Logical security tools and techniques are administered to restrict access to programs, data, and other information resources based on the "need to know" principle. User rights per software platform are reviewed on a regular basis by the Head of Department. The Internal Audit function is ensuring that proper governance of Information Security is in place.



#### Third party ICT Risk and Outsourcing Risk

ICT and Outsourcing Risk are regularly discussed at the monthly scheduled meetings of the Risk Management Committee in order to closely monitor this type of risk. Further, the Third-Party ICT & Outsourcing Risk Officers perform risk assessments and due diligence visits to outsourced providers which have a high residual risk. Additionally, Risk Management Department conducts every year a quantitative outsource risk inventory and risk analysis and monitors issues from ICT service providers as per DORA requirements.

#### Climate Related & Environmental Risks (CR&E)

As a part of EBA guidelines and CSSF requirements, the Bank has established a climate risk framework to measure and prevent CR&E risks. This framework comprises an annual materiality assessment, regulator monitoring of KRIs and stress testing on its main risk categories exposed to physical and transition risks. The outcome of these controls is reported to the monthly scheduled meetings of the Risk Management Committee.

#### Risk Strategy

In compliance with the legal and regulatory mandates and for the purpose of protecting the institution and its reputation, the Bank's Board of Directors approves the Bank's risk strategy, including its risk appetite, risk tolerance, and the guiding principles governing risk identification, measurement, reporting, treatment, and monitoring.

#### ICAAP/ILAAP and Business Recovery Plan

In line with regulatory rules and guidelines, the Bank conducts Stress Tests on each of the major risk types (credit, market, operational, liquidity) for the yearly ICAAP/ILAAP Report and setup an annual fully-fledged Business Recovery Plan (BRP) according with the Business Recovery and Resolution Directive (BRRD). Based on Reverse Stress Tests (extreme stress scenarios for the Bank), the Recovery Plan allows the Bank to take actions for a business recovery in case of any severe business or economic downturn which may affect the Bank severely, and this will aid in the avoidance of any bankruptcy and will aid the resolution of the bank. For this, recovery options are defined that the Bank could use in order to restore its capital base, liquidity position or profitability, all combined assisting in the avoidance of any bankruptcy. Given the results of the ICAAP/ILAAP Stress Tests and the setup of the Business Recovery Plan, the Bank is quite stable in particular in case of any sudden or unforeseen economic downturns.

**Kosuke NAKAYAMADA**  
Chief Executive Officer

15 April 2025



# REPORT OF THE RÉVISEUR D'ENTREPRISES AGRÉÉ

## Report on the audit of the annual accounts

### Opinion

We have audited the annual accounts of Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. (the "Bank"), which comprise the balance sheet as at 31 December 2024, and the profit and loss account for the year then ended, and notes to the annual accounts, including a summary of significant accounting policies.

In our opinion, the accompanying annual accounts give a true and fair view of the financial position of the Bank as at 31 December 2024, and of the results of its operations for the year then ended in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the annual accounts.

### Basis for opinion

We conducted our audit in accordance with the EU Regulation N° 537/2014, the Law of 23 July 2016 on the audit profession ("Law of 23 July 2016") and with International Standards on Auditing ("ISAs") as adopted for Luxembourg by the "Commission de Surveillance du Secteur Financier" ("CSSF"). Our responsibilities under the EU Regulation No 537/2014, the law of 23 July 2016 and ISAs as adopted for Luxembourg by the CSSF are further described in the « Responsibilities of the "réviseur d'entreprises agréé" for the audit of the annual accounts » section of our report. We are also independent of the Bank in accordance with the International

Code of Ethics for Professional Accountants, including International Independence Standards, issued by the International Ethics Standards Board for Accountants (IESBA Code) as adopted for Luxembourg by the CSSF together with the ethical requirements that are relevant to our audit of the annual accounts, and have fulfilled our other ethical responsibilities under those ethical requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the annual accounts of the current period. These matters were addressed in the context of the audit of the annual accounts as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.





## Revenue recognition - Commission receivable

### Why the matter was considered to be one of most significant in the audit

We refer to Summary of significant accounting policies - Note 2.13 - Revenue Recognition and Note 22 on Commission Receivable of the annual accounts.

Commission receivable amounted to USD 121.307.445 as of 31 December 2024. Commissions receivable mainly derive from investment funds and global custody operations.

The applicable rates per each type of commission depend on the underlying assets under custody and administration, agreements and services provided.

The recognition process of commission receivable includes manual intervention, and it is considered to be a key audit matter due to the materiality of the related amounts, combined with the volume of transactions that are recorded.

### How the matter was addressed in the audit

Our audit focused on the following procedures:

We held interviews with Finance and Billing department and obtained an understanding of the commission receivable recognition process.

We assessed the design and implementation of the internal controls surrounding commission receivable and tested operating effectiveness of the relevant related key controls.

We developed expectations for the aggregate amounts per type of commission income and we compared the expectations to the amounts recorded by the Bank.

For a sample of the different types of commissions:

- We tested commission receivable by performing independent recalculation of the commissions for a sample of items. This also included the reconciliation of the fee terms to the underlying contracts and the underlying basis to external evidence;
- We agreed the receipt of accrued commissions to payments subsequent year end;
- We included elements of “unpredictability” in the procedures performed in response to the risk of fraud by randomly selecting additional items and by verifying appropriate segregation of duties, as well as the application of the “4 eyes principle”, within the fee and commission income process.



## Other information

The Board of Directors is responsible for the other information. The other information comprises the information stated in the management report but does not include the annual accounts and our report of the “réviseur d’entreprises agréé” thereon.

Our opinion on the annual accounts does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the annual accounts, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the annual accounts or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report this fact. We have nothing to report in this regard.

## Responsibilities of the Board of Directors for the annual accounts

The Board of Directors is responsible for the preparation and fair presentation of these annual accounts in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the annual accounts, and for such internal control as the Board of Directors determines is necessary to enable the preparation of annual accounts that are free from material misstatement, whether due to fraud or error.

In preparing the annual accounts, the Board of Directors is responsible for assessing Bank’s ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of

Directors either intends to liquidate the Bank or to cease operations, or has no realistic alternative but to do so.

## Responsibilities of the “réviseur d’entreprises agréé” for the audit of the annual accounts

Our objectives are to obtain reasonable assurance about whether the annual accounts as a whole are free from material misstatement, whether due to fraud or error, and to issue a report of the “réviseur d’entreprises agréé” that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the EU Regulation N° 537/2014, the Law dated 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual accounts.

As part of an audit in accordance with the EU Regulation N° 537/2014, the Law dated 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the annual accounts, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.



- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.
- Conclude on the appropriateness of Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report of the "*réviseur d'entreprises agréé*" to the related disclosures in the annual accounts or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our report of the "*réviseur d'entreprises agréé*". However, future events or conditions may cause the Bank to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the annual accounts, including the disclosures, and whether the annual accounts represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have

complied with relevant ethical requirements regarding independence, and communicate to them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the annual accounts of the current period and are therefore the key audit matters. We describe these matters in our audit report unless law or regulation precludes public disclosure about the matter.

### **Report on Other Legal and Regulatory Requirements**

We have been appointed as *réviseur d'entreprises agréé* by the Board of Directors on 14 March 2024 and the duration of our uninterrupted engagement, including previous renewals and reappointments, is 5 years.

The management report is consistent with the annual accounts and has been prepared in accordance with applicable legal requirements.

We confirm that the prohibited non-audit services referred to in the EU Regulation N° 537/2014 were not provided and that we remained independent of the Bank in conducting the audit.

Luxembourg, 15 April 2025

BDO Audit  
*Cabinet de révision agréé*

represented by  
Patrick Terazzi







## BALANCE SHEET AND OFF BALANCE SHEET ITEMS

December 31, 2024 (in USD)

### BALANCE SHEET ASSETS

	Notes	2024	2023
Cash, balances with central banks and post office banks	32.1., 32.3.	<b>3.286.867.465</b>	<b>2.935.193.869</b>
Treasury bills and similar securities	32.1., 32.3.	<b>199.832.228</b>	<b>0</b>
Loans and advances to credit institutions	3, 16, 32.1., 32.3.	<b>4.294.491.534</b>	<b>3.616.724.062</b>
<i>a) repayable on demand</i>		2.066.200.527	1.603.412.205
<i>b) other loans and advances</i>		2.228.291.007	2.013.311.857
Loans and advances to customers	32.1., 32.3.	<b>4.714.184</b>	<b>7.905.238</b>
Shares and other variable-yield securities	4, 32.1., 32.3.	<b>0</b>	<b>2.738</b>
Fixed Assets	5	<b>3.903.373</b>	<b>2.742.761</b>
Other assets	6	<b>828</b>	<b>690</b>
Prepayments and accrued income	7, 16	<b>101.694.508</b>	<b>75.461.935</b>
<b>TOTAL ASSETS</b>	<b>8</b>	<b>7.891.504.120</b>	<b>6.638.031.293</b>



## LIABILITIES

	Notes	2023	2023
Amounts owed to credit institutions	16, 32.1.	<b>2.506.417.471</b>	<b>2.072.466.179</b>
<i>a) repayable on demand</i>		2.506.417.471	2.072.466.179
<i>b) with agreed maturity dates</i>		0	0
Amounts owed to customers	9, 16, 32.1.	<b>4.535.446.327</b>	<b>3.815.550.822</b>
<i>a) repayable on demand</i>		4.535.446.327	3.815.550.822
<i>b) with agreed maturity dates</i>		0	0
Other liabilities	10	<b>1.192.954</b>	<b>1.229.105</b>
Accruals and deferred income	11, 16	<b>37.659.075</b>	<b>58.526.361</b>
Provisions		<b>45.239.623</b>	<b>39.457.074</b>
<i>a) provisions for taxation</i>	12	42.603.767	37.241.146
<i>b) other provisions</i>	13	2.635.856	2.215.928
Subscribed capital	14	<b>187.117.966</b>	<b>187.117.966</b>
Reserves	15	<b>463.212.940</b>	<b>364.038.890</b>
Result brought forward	15	470.846	1.762.158
Profit for the financial year		<b>114.746.918</b>	<b>97.882.738</b>
<b>TOTAL LIABILITIES</b>	<b>17</b>	<b>7.891.504.120</b>	<b>6.638.031.293</b>





## OFF BALANCE SHEET ITEMS

December 31, 2024 (in USD)

	Notes	2024	2023
Contingent liabilities	18, 32.1.	<b>89.985</b>	<b>88.703</b>
<i>of which:</i>			
<i>guarantees and assets pledged as</i>			
<i>collateral security</i>		89.985	88.703
<b>FIDUCIARY OPERATIONS</b>	<b>21</b>	<b>46.487.696.372</b>	<b>52.561.295.560</b>



# PROFIT AND LOSS ACCOUNT

Year ended December 31, 2024 (expressed in USD)

	Notes	2024	2023
Interest receivable and similar income		<b>334.798.656</b>	<b>305.406.272</b>
<i>of which:</i>			
- Negative interest received on amounts owed to credit institutions and to customers		170.130	419.480
- From Fixed Income securities		839.678	
- Interest Gain from foreign currency swap		42.495.059	54.460.452
Interest payable and similar charges		<b>(217.563.057)</b>	<b>(207.634.601)</b>
<i>of which:</i>			
- Negative interest paid on loans and advances and on balances with credit institutions		(226.173)	(505.331)
- Interest Loss from foreign currency swap		(2.772.774)	(4.270.379)
Income from securities		<b>0</b>	<b>0</b>
<i>Income from shares and other variable yield securities</i>		0	0
Commission receivable	22	<b>121.307.445</b>	<b>120.905.992</b>
Commission payable		<b>(31.659.133)</b>	<b>(33.509.033)</b>
Net profit on financial operations		<b>5.462.993</b>	<b>4.397.406</b>
Other operating income	23	<b>6.648.265</b>	<b>7.382.356</b>
General administrative expenses		<b>(58.406.260)</b>	<b>(60.136.136)</b>
<i>a) staff costs</i>	25, 26	(27.010.900)	(25.051.516)
<i>of which:</i>			
- wages and salaries		(21.603.840)	(20.355.899)
- social security costs		(2.394.518)	(2.584.124)
<i>of which:</i> - social security costs relating to pensions		(1.584.280)	(1.545.058)
<i>b) other administrative expenses</i>	27, 31	(31.395.360)	(35.084.620)
Value adjustments in respect of tangible and intangible assets		<b>(1.338.269)</b>	<b>(1.275.260)</b>
Other operating charges	24	<b>(4.860.403)</b>	<b>(2.519.709)</b>
Tax on profit on ordinary activities	12, 28.1	<b>(37.869.782)</b>	<b>(33.421.187)</b>
Profit on ordinary activities after tax		<b>116.520.455</b>	<b>99.596.100</b>
Other taxes not shown under the preceding items	28.2	<b>(1.773.537)</b>	<b>(1.713.362)</b>
<b>PROFIT FOR THE FINANCIAL YEAR</b>		<b>114.746.918</b>	<b>97.882.738</b>



# NOTES TO THE ACCOUNTS

December 31, 2024

## NOTE 1 - GENERAL

### 1.1. Corporate matters

Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. (the "Bank") was incorporated in Luxembourg on April 11, 1974 as a *société anonyme*.

On April 1, 1996, the Parent Bank, The Bank of Tokyo, Ltd., merged with The Mitsubishi Bank, Limited to form The Bank of Tokyo-Mitsubishi Ltd., and Bank of Tokyo (Luxembourg) S.A. changed its name to Bank of Tokyo-Mitsubishi (Luxembourg) S.A.

On October 1, 2005, the indirect shareholder, Mitsubishi Tokyo Financial Group, Inc. (MTFG) merged with UFJ Holdings, Inc. (UFJ) and formed a new financial group, Mitsubishi UFJ Financial Group (MUFG).

On January 1, 2006, the Parent Bank, The Bank of Tokyo-Mitsubishi, Ltd. merged with UFJ Bank Limited to form The Bank of Tokyo-Mitsubishi UFJ Ltd., and Bank of Tokyo-Mitsubishi (Luxembourg) S.A. changed its name to Bank of Tokyo-Mitsubishi UFJ (Luxembourg) S.A.

On April 2, 2007, the Bank became a jointly capitalized subsidiary of Mitsubishi UFJ Trust and Banking Corporation by 70% and Bank of Tokyo-Mitsubishi UFJ Ltd. by 30%, which are under the same holding company Mitsubishi UFJ Financial Group (MUFG). Consequently, Bank of Tokyo-Mitsubishi UFJ (Luxembourg) S.A. changed its name to MITSUBISHI UFJ Global Custody S.A. (MUGC).

On April 28, 2008, MITSUBISHI UFJ Global Custody S.A., has issued 49,080 new shares and the capital of the Bank has been increased by USD 1,817,968,52. The total subscribed share capital is currently set at USD 37,117,968,52. The two major shareholders of the Bank hold 92,25% of the capital, Mitsubishi

UFJ Trust and Banking Corporation by 63,72% and Bank of Tokyo-Mitsubishi UFJ Ltd. by 28,53%.

On August 7, 2014, Mitsubishi UFJ Global Custody S.A. established an external branch located in Dublin, Ireland. Dublin Branch is registered as a credit institution, regulated by the Central Bank of Ireland for conduct of business rules, under number 907648.

On May 1, 2016, MITSUBISHI UFJ Global Custody S.A. has changed its name to MITSUBISHI UFJ INVESTOR SERVICES & BANKING (LUXEMBOURG) S.A. (MIBL).

On May 31, 2017, Mitsubishi UFJ Trust and Banking Corporation obtained 100% of the voting shares of Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A.

The members of the Board of Directors are Senior Executives of Mitsubishi UFJ Trust and Banking Corporation Group and Independent Directors. The business policy and valuation principles, unless prescribed by the legal requirements existing in Luxembourg, are determined and monitored by the Board of Directors in accordance with those applied in Mitsubishi UFJ Financial Group.

### 1.2. Nature of business

The object of the Bank is the undertaking for its own account, as well as for the account of third parties either within or outside the Grand-Duchy of Luxembourg, of any banking or financial operations, as well as all other operations, whether industrial or commercial or in real estate, which directly or indirectly relate to the main object described above.

More specifically, the Bank concentrates its activities on investment management services.

A significant volume of the Bank's transactions is concluded directly or indirectly with companies of Mitsubishi UFJ Financial Group.



### 1.3. Annual accounts

The Bank prepares its annual accounts in US Dollars (USD), the currency in which the capital is expressed. The Bank's accounting year coincides with the calendar year.

The Bank's Board of Directors has made an assessment of the Bank's ability to continue as a going concern and is satisfied that the Bank has the resources to continue in business for the foreseeable future. Furthermore, the Board of Directors is not aware of any material uncertainties that may cast significant doubt upon the Bank's ability to continue as a going concern. Therefore, the annual accounts continue to be prepared on the going concern basis.

## NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The Bank prepares its annual accounts under the historical cost principle in accordance with the laws and regulations in force in the Grand-Duchy of Luxembourg and on the basis of accounting principles generally accepted in the banking sector in the Grand-Duchy of Luxembourg.

In observing these, the following significant accounting policies are applied.

### 2.1. The date of recording of transactions in the balance sheet

Assets and liabilities are stated in the balance sheet on the date the amounts concerned become cleared funds, that is, on their date of effective transfer.

### 2.2. Foreign currencies

The Bank maintains a multi-currency accounting system which records all transactions in the currency or currencies of the transaction, on the day on which the contract is concluded.

Assets and liabilities are converted into USD at the spot exchange rates applicable at the balance sheet date. Both realised and unrealised profits and losses arising on revaluation are accounted for in the profit and loss account for the year, except

for those resulting from items specifically covered by a forward foreign exchange contract (swap and hedging forward foreign exchange contract) which are recorded at historical exchange rates.

Revenues and expenses in foreign currencies are translated into USD daily at the prevailing exchange rates.

At the year-end, all unsettled forward transactions are translated into USD at the forward rate prevailing on the Balance Sheet date for the remaining maturities.

Results on unsettled forward transactions linked to spot transactions and on swap transactions are accrued at the balance sheet date. In case of unrealised results on position covered by foreign exchange swap, these are neutralized at year end.

The main foreign currency exchange rates used as at December 31, 2024 are as follows:

1 USD = 1,25240000 GBP

1 USD = 0,00636294 JPY

1 USD = 1,03550000 EUR

### 2.3. Financial instruments

#### 2.3.1 Debt securities – Treasury bills

Investments in Debt securities are recorded at acquisition costs, including transaction cost. If the intention of the entity is to hold the debt securities to maturity and they are held only for collection of contractual cash flows, i.e. solely for receiving payments of principal and interest, they are classified at amortised cost. Interest income from these financial assets is included in Interest receivables and similar income using effective interest method.

If the market value of Debt securities at balance sheet date is lower than acquisition cost and this reduction is considered as permanent, a value adjustment is recorded. If the decrease in value is not considered as permanent no adjustment is made. If the market value exceeds the acquisition cost no impairment adjustment is recorded.

Debt securities are derecognised when the right for contractual cash flow expires.



### 2.3.2 Derivatives

The Bank's commitments deriving from the derivatives financial instruments such as interest rate swaps, forward rate agreements, financial futures and options are recorded on the transaction date among the off balance sheet items.

At the year-end, where necessary, a provision is set up in respect of individual unrealised losses resulting from the revaluation of the Bank's commitments at market value. There is no provision for unrealized losses on forward deals recorded for the year 2024 (2023: USD 0).

No provision is set up in those cases where a financial instrument clearly covers an asset or a liability and economic unity is established or where a financial instrument is hedged by a reverse transaction so that no open position exists.

### 2.4. Specific value adjustments in respect of doubtful and irrecoverable debts

It is the Bank's policy to establish specific value adjustments in respect of doubtful and irrecoverable debts, as deemed appropriate by the Board of Directors.

Value adjustments, if any, are deducted from the assets to which they relate.

### 2.5. Value adjustments for possible losses on bills, loans and advances and leasing transactions

The value adjustments for possible losses on loans and advances, if any, are deducted from the assets to which they relate.

### 2.6. Lump-sum provision for risk exposures

In accordance with the Luxembourg tax legislation, the Bank can establish a lump-sum provision for risk exposures, as defined in the legislation governing prudential supervision of banks. The purpose of the provision is to take account of risks which are likely to crystallise, but which have not yet been identified as at the date of preparation of the annual accounts.

Pursuant to the Instructions issued by the Directeur des Contributions on December 16, 1997, this provision should be made before taxation and should not exceed 1,25% of the Bank's risk exposures.

The Bank has not constituted any provision as of December 31, 2024 (2023: USD 0).

### 2.7. Transferable securities

Transferable securities are recorded initially at their purchase price. The average cost method is used for initial recognition. Value adjustments, calculated as described in note 2.5. or arising from a diminution of value, are deducted from the account balance.

### 2.8. Tangible and intangible assets

Tangible and intangible assets are valued at purchase price. The value of tangible and intangible fixed assets with limited useful economic lives is reduced by value adjustments calculated to write off the value of such assets systematically over their useful economic lives as follows:

- Hardware equipment: 4 years;
- Software: 4 years and 5 years;
- Other intangible assets: 5 years;
- Other tangible assets: 10 years;
- Goodwill: 5 years.

### 2.9. Taxes

Taxes are accounted for on an accrual basis in the accounts of the year to which they relate. Provision for taxation corresponds to the difference between the estimated provisions created by the Bank and the advance payments for the financial years for which no final tax assessment notices have been received yet.

### 2.10. Prepayment and accrued income

This asset item includes expenditure incurred during the financial year but relating to a subsequent financial year.



### 2.11. Accruals and deferred income

This liability item includes income received during the financial year but relating to a subsequent financial year.

### 2.12. Provisions

Provisions are intended to cover losses or debts the nature of which is clearly defined and which, at the date of the balance sheet are either likely to be incurred or certain to be incurred but uncertain as to their amount or as to the date on which they will arise.

### 2.13. Revenue recognition

The Bank's main streams of revenue are comprised of interests and commissions income. The Bank earns fee and commission income from a wide range of services it provides to its customers.

Revenue is generally recognized when the related services are performed or recognized over the period that the services are provided.

## NOTE 3 - LOANS AND ADVANCES TO CREDIT INSTITUTIONS

Loans and advances to credit institutions other than those repayable on demand, presented at their nominal value may be analysed according to their remaining maturity as follows:

	2024 USD	2023 USD
Not more than three months	2.655.900.236	2.202.093.277
More than three months but less than one year	1.638.591.298	1.414.630.785
	<b>4.294.491.534</b>	<b>3.616.724.062</b>

## NOTE 4 - SHARES AND OTHER VARIABLE YIELD SECURITIES

Transferable securities shown under the item "Shares and other variable yield securities" consisted entirely of unlisted securities have been disposed during the current financial year 2024: USD 0 (2023: USD 2.738).





## NOTE 5 - MOVEMENTS IN FIXED ASSETS

The following movements have occurred in the Bank's fixed assets in the course of the financial year:

### FIXED ASSETS:

	Gross value at the beginning of the financial year	Additions	Disposals
	USD	USD	USD
<b>1. Tangible assets</b>	<b>3.545.334</b>	<b>467.834</b>	<b>(2.069.399)</b>
a) Hardware	1.033.568	25.677	(385.532)
b) Other fixtures and fittings, flat furniture, equipment and vehicles	2.511.766	442.157	(1.683.867)
<b>2. Intangible assets</b>	<b>24.247.135</b>	<b>2.151.402</b>	<b>(4.383.335)</b>
a) Software	22.301.696	2.151.402	(4.383.335)
b) Goodwill acquired for valuable Consideration	1.945.439	0	0
<b>Total Fixed Assets</b>	<b>27.792.469</b>	<b>2.619.236</b>	<b>(6.452.734)</b>

Goodwill acquired for valuable consideration represents the value of the takeover of part of the client base of another institution.

## NOTE 6 - OTHER ASSETS

	2024 USD	2023 USD
Other assets	828	690
	<b>828</b>	<b>690</b>



Exchange difference	Gross value at the end of the financial year	Cumulative value adjustments	Net value at the end of the financial year
USD	USD	USD	USD
<b>(221,934)</b>	<b>1,727,221</b>	<b>1,120,541</b>	<b>606,679</b>
(64,700)	608,987	538,934	70,053
(157,234)	1,118,234	581,607	536,626
<b>(1,396,064)</b>	<b>20,617,076</b>	<b>17,320,381</b>	<b>3,296,694</b>
(1,396,064)	18,671,637	15,374,942	3,296,694
0	1,945,439	1,945,439	0
<b>(1,617,998)</b>	<b>22,344,297</b>	<b>18,440,922</b>	<b>3,903,373</b>

## NOTE 7 - PREPAYMENTS AND ACCRUED INCOME

The Bank's prepayments and accrued income may be analysed as follows:

	2024 USD	2023 USD
Accrued interest income	51,215.873	30,925.318
Accrued Interest income on swaps	1,016.193	17,079.967
Commission from the Management Company	746.915	691.916
Commission on fiduciary operations	1,141.795	4,411.547
Commission on global custody	8,924.903	6,317.669
Commission on investment funds	9,463.198	10,617.073
Other accrued income	2,037.276	1,574.684
Other Commissions	1,333.062	881.536
Other prepayments	0	0
Neutralization of foreign exchange results on position covered by foreign exchange swap (note 2.2.)	24,854.537	0
Prepaid general expenses	985.936	567.781
Prepaid income taxes	114.246	0
VAT recoverable	(139.426)	2,394.444
	<b>101,694.508</b>	<b>75,461.935</b>



## NOTE 8 - FOREIGN CURRENCY ASSETS

At December 31, 2024, the aggregate amount of the Bank's assets denominated in foreign currencies, translated into USD, is USD 4.981.621.281 (2023: USD 4.585.122.868).

## NOTE 9 - AMOUNTS OWED TO CUSTOMERS

As at December 31, 2024, there is no debts other than those repayable on demand owed to customers. (as at December 31, 2023 debts other than repayable on demand amounted to USD 0).

## NOTE 10 - OTHER LIABILITIES

The Bank's other liabilities may be analysed as follows:

	2024 USD	2023 USD
Preferential creditors	951.876	971.611
Sundry creditors	241.078	257.494
	<b>1.192.954</b>	<b>1.229.105</b>

## NOTE 11 - ACCRUALS AND DEFERRED INCOME

The Bank's accruals and deferred income may be analysed as follows:

	2024 USD	2023 USD
Accrued commission	7.675.294	8.561.263
Accrued general expenses	9.047.023	7.790.425
Accrued interest expenses	19.335.272	15.081.748
Other deferred income	12.081	15.411
Neutralization of foreign exchange results on position covered by foreign exchange swap (note 2.2.)	0	26.800.870
Other accrued expenses	1.589.405	276.644
	<b>37.659.075</b>	<b>58.526.361</b>

## NOTE 12 - TAXATION - EXCHANGE DIFFERENCE: DEFERRED TAXATION

The Bank prepares its annual accounts in USD, currency in which its statutory capital is denominated.

In September 2018 the Tax Authorities authorized the Bank to use the USD tax functional currency in accordance with the Circular L.G.-A no 60 dated June 21, 2016.

Consequently, the fiscal and commercial balance sheets are established in the same currency the USD.

As at December 31, 2023, there is no deferred tax.

## NOTE 13 - OTHER PROVISIONS

The Bank's other provisions are made of provision for staff remuneration.

	2024 USD	2023 USD
Provision for staff remuneration	2.635.856	2.215.928
	<b>2.635.856</b>	<b>2.215.928</b>

## NOTE 14 - SUBSCRIBED CAPITAL

As of December 31, 2024, the Bank's subscribed and fully paid up capital amounts to USD 187.117.966 for 5.002.575 shares of Class A and 49.080 shares of Class B.



## NOTE 15 - MOVEMENTS IN RESERVES AND RESULT BROUGHT FORWARD

	Legal reserve	Other reserves	Result brought forward
	USD	USD	USD
Balance at January 1, 2024	15.676.130	348.362.760	1.762.158
Profit for the year ended December 31, 2023	0	0	97.882.738
Appropriation of profit			
- Dividends paid to shareholders	0	0	0
- Transfer to reserves for Net Worth Tax 2023	0	14.060.000	(14.060.000)
- Transfer from Reserve for Net Worth Tax 2018	0	(9.981.000)	9.981.000
- Allocation to Free reserve	0	92.000.000	(92.000.000)
- Allocation to Legal reserve	3.095.050	0	(3.095.050)
<b>Balance at December 31, 2024</b>	<b>18.771.180</b>	<b>444.441.760</b>	<b>470.846</b>

Under Luxembourg law, the Bank must appropriate to a legal reserve an amount equivalent to at least 5% of the annual net profit until such reserve is equal to 10% of the share capital. This appropriation is made in the following year. Distribution of the legal reserve is restricted.

Based on the Luxembourg tax law, the Bank has elected to get a tax credit for all or part of the net worth tax due for that year. This tax credit is however, limited to the amount of the corporate income tax due for the previous year before the imputation of any tax credits. In order to profit from this credit, the Bank must commit itself to post before the end of the subsequent year an amount equal to five times the net worth tax credit to a special reserve, which has to be maintained for a period of five years.

As of December 31 2024, the special reserve for net worth tax is included in the Bank's other reserve for a total amount of USD 62.490.675 (2023: USD 58.411.675).

As resolved in the Annual General Meeting dated March 28, 2024, the Bank has allocated an amount of USD 14.060.000 to special reserve for Net Worth Tax 2024 and reversed the available special reserve for Net Worth Tax constituted in 2019 which amounted to USD 9.981.000.

The accumulated balance of special reserve for Net Worth Taxes states as follows as at December 31, 2024



Years	2024 Reserve for Net Worth Tax USD
2020	10.911.000
2021	11.874.000
2022	12.265.675
2023	13.380.000
2024	14.060.000
<b>Balance at December 31, 2024</b>	<b>62.490.675</b>

## NOTE 16 - RELATED PARTY BALANCES

As of December 31, 2024, the following balances with related parties are outstanding:

### ASSETS

	2024 USD	2023 USD
Loans and advances to credit institutions	3.530.745.328	2.982.750.453
Prepayments and accrued income	51.409.241	18.601.641
	<b>3.582.154.569</b>	<b>3.001.352.094</b>

### LIABILITIES

	2024 USD	2023 USD
Amounts owed to credit institutions	2.453.893.363	1.942.039.398
Amounts owed to customers	487.520.002	339.089.048
Accruals and deferred income	11.814.569	8.300.550
	<b>2.953.227.934</b>	<b>2.289.428.996</b>



At the request of the Bank, the CSSF has granted a total exemption for the exposures towards the group (Mitsubishi UFJ Financial Group) in the calculation of large exposure limits, in accordance with the Regulation (EU) No 575/2013 of June 26, 2013 (Part IV).

### NOTE 17 - FOREIGN CURRENCY LIABILITIES

At December 31, 2024, the aggregate amount of liabilities denominated in foreign currencies translated into USD is USD 4.981.621.281 (2023: 4.585.122.870).

### NOTE 18 - CONTINGENT LIABILITIES

The Bank's contingent liabilities may be analysed as follows:

	2024 USD	2023 USD
Counter-guarantees issued	89.985	88.703

As at the year-end, there were no related party balances.

### NOTE 19 - COMMITMENTS

The Bank has entered into certain commitments which are not disclosed neither in the Balance Sheet nor in the Off-Balance Sheet Items, but which are significant for the purposes of assessing the financial situation of the Bank. Details of such commitments are as follows:

	2024 USD	2023 USD
Commitments in respect of fixed rental payments contracted on buildings		
From 1 to 5 years	3.150.645	703.210
More than 5 years	0	0
	<b>3.150.645</b>	<b>703.210</b>

As at the year-end, there are no related party balances.

### NOTE 20 - OPERATIONS LINKED TO CURRENCY EXCHANGE RATES, INTEREST RATES AND OTHER MARKET RATES

The following types of forward transactions are outstanding as at December 31, 2024 and 2023:

#### Operations linked to currency exchange rates

- Forward exchange transactions (swaps, outright).

Operations linked to the foreign currency exchange rates are made to a large extent for the purposes of covering the existing positions.

### NOTE 21 - INVESTMENT MANAGEMENT SERVICES AND UNDERWRITING FUNCTIONS

Management and agency services provided by the Bank include:

- Custody and administration of transferable securities;
- Fiduciary representations;
- Agency functions;
- Portfolio management and advice.





## NOTE 22 - COMMISSIONS RECEIVABLE

	2024 USD	2023 USD
Fees on Investment Funds	28.904.862	27.782.396
Fees on Global custody from Institutional customers	83.848.999	84.167.200
Fees on Fiduciary transactions	4.502.435	4.634.416
Fees on Services to Management Company	848.860	1.060.166
Other fees and commissions	3.202.290	3.261.813
	<b>121.307.445</b>	<b>120.905.991</b>

Commissions receivables consist of the following:

Fees on Investment Funds consist of fees and commissions charged to Investment Funds for custody services, central administration, depositary and other services. The fees are calculated on the basis of the value of net assets of the funds under administration.

Fees on Global custody from Institutional customers consist of fees and commissions charged to institutional customers for global custody services including securities trade management, settlement, corporate actions, income collection and proxy voting. The fees are calculated on the basis of the assets held under custody and the number of transactions.

Fees on Fiduciary transactions consist of fees and commissions earned on fiduciary assets including custody transactions, cash management and fiduciary notes issuance. The fees are calculated on the basis of the assets held under management and the number of transactions.

Fees on Services to Management Company include fees covering functional expenditures and fees for support services in accordance with the Service Level Agreement.

Other fees and commissions include various fees such as listing agent fees, guarantee fees, banking services fees and fund order desk services fees.

By application of Article 69(2) of the law of June 17, 1992, on the annual accounts of credit institutions sources of income have not been analysed by geographical region.



## NOTE 23 - OTHER OPERATING INCOME

	2024 USD	2023 USD
Adjustment of Income taxes regarding previous years	21.422	93.745
Adjustment for commission previous years	2.698.513	5.410.115
Income from the adjustment of general expenses regarding previous years	2.818.786	874.597
Sub-Custodian refund (*)	1.108.055	217.437
Adjustment of VAT regarding previous years	0	779.823
Other operating income	1.489	6.639
	<b>6.648.265</b>	<b>7.382.356</b>

(\*) Sub-Custodian refund: Migration costs refund from Citibank relating to change of sub-custodian from Brown Bother Harriman to Citibank.

## NOTE 24 - OTHER OPERATING CHARGES

	2024 USD	2023 USD
Charges from the adjustment of general expenses regarding previous years	2.015.093	393.238
Commission on previous years	1.709.746	1.691.949
Interest on previous years	621.603	77.704
Others operating losses	513.961	356.818
	<b>4.860.403</b>	<b>2.519.709</b>

## NOTE 25 - STAFF NUMBERS

The average number of persons employed during the financial year by the Bank is as follows:

	2024 Number	2023 Number
Senior management	33	33
Middle management	110	95
Employees	37	45
	<b>180</b>	<b>173</b>



## NOTE 26 - MANAGEMENT REMUNERATION

The Bank has granted emoluments in respect of the financial year to the members of the managerial body of the Bank by reason of their responsibilities as follows:

	2024 USD	2023 USD
Senior management	6.891.042	6.789.725
Of which variable remuneration	786.127	881.875
Of which fix remuneration	6.104.915	5.413.786

During the financial year, no pension commitments to the members of the Board of Directors and General Management were made.

As at December 31, 2024 and 2023, the Bank did not grant any advances and credits to the members of the Board of Directors and General Management.

## NOTE 27 - OTHER ADMINISTRATIVE EXPENSES

	2024 USD	2023 USD
Data charges	617.081	517.602
Maintenance	993.416	1.192.339
Membership fees	1.300.323	6.968.897
Professional fees	10.075.901	8.808.345
Rent and related expenses	1.968.873	1.969.623
Service contracts	5.410.449	5.660.765
Service fee	4.719.531	3.940.649
System cost	5.100.833	5.138.430
Telecommunication expenses	672.820	586.992
Travelling, moving, business trips	372.436	202.482
Other expenses	163.697	98.496
	<b>31.395.360</b>	<b>35.084.620</b>

## NOTE 28 - TAX

### 28.1. Tax on profit on ordinary activities

	2024 USD	2023 USD
Corporate Income Tax	27.645.152	24.363.057
Municipal Business Tax	10.224.630	9.058.130
	<b>37.869.782</b>	<b>33.421.187</b>

### 28.2. Other taxes not shown under the preceding items

	2024 USD	2023 USD
VAT	1.637.642	1.641.509
Other taxes	135.895	71.853
	<b>1.773.537</b>	<b>1.713.362</b>

## NOTE 29 - PARENT UNDERTAKING

Since December 31, 2020, the Bank is a jointly capitalized subsidiary of Mitsubishi UFJ Trust and Banking Corporation by 100%, which are under the holding company Mitsubishi UFJ Financial Group (MUFG), which is incorporated under the laws of Japan and whose registered office is in Tokyo.

The annual accounts of the Bank are included in the consolidated accounts of Mitsubishi UFJ Trust and Banking Corporation, with Registered Financial Institution number 33 at Kanto Local Finance Bureau Japan and registered address 4-5, Marunouchi 1-Chome, Chiyoda-Ku, Tokyo 100-8212, Japan.

The consolidated accounts of the holding company Mitsubishi UFJ Financial Group (MUFG) may be obtained from the head office at 4-5, Marunouchi 1-Chome, Chiyoda-Ku, Tokyo 100-8212, Japan.



### NOTE 30 - DEPOSIT GUARANTEE SCHEME

The law related to the resolution, reorganisation and winding-up measures of credit institutions and certain investment firms and on deposit guarantee and investor compensation schemes (the "Law"), transposing into Luxembourgish law the directive 2014/59/EU establishing a framework for the recovery and resolution of credit institutions and investment firms and the directive 2014/49/EU related to deposit guarantee and investor compensation schemes, was passed on December 18, 2015.

The deposit guarantee scheme ("*Fonds de garantie des dépôts Luxembourg*") (FGDL) and the investor compensation system ("*Système d'indemnisation des investisseurs Luxembourg*") (SIIL) cover eligible deposits of each depositor up to an amount of EUR 100.000 and investments up to an amount of EUR 20.000. The Law also provides that deposits resulting from specific transactions or fulfilling a specific social or other purpose are covered for an amount above EUR 100.000 for a period of 12 months.

Credit institutions contribute on an annual basis to the Luxembourg banking resolution fund ("*Fonds de resolution Luxembourg*") (FRL), respectively to the FGDL.

The funded amount of the FRL shall reach by the end of 2024 at least 1% of covered deposits, as defined in article 107(1) of the Law, of all authorized credit institutions in all participating Member States. This amount was collected during the years 2015 to 2024.

The target level of funding of the FGDL is set at 0,8% of covered deposits, as defined in article 179(1) of the Law, of the relevant credit institutions and is to be reached by the end of 2018 through annual contributions. This amount was collected during the years 2016 to 2018. When the level of 0,8% is reached, the Luxembourgish credit institutions are to continue to contribute for 8 additional years in order to constitute an additional safety buffer

of 0.8% of covered deposits as defined in article 180(1) of the Law.

For the year end December 31, 2024, the Bank's annual contribution for FRL amounted to EUR 338.00 (USD 366.87). (2023: EUR 5.327.640 / USD 5.716.313).

### NOTE 31 - AUDIT FEES

Within the framework of the EU audit legislation and the mandatory audit firm rotation, the Bank has appointed BDO Audit S.A. starting from the fiscal year 2020.

The fees of the Auditor of the Bank are as follows (excluding VAT):

	2024 USD	2023 USD
Audit fees	235.765	250.097
Audit related fees	73.515	74.486
Tax fees	20.037	30.055
	<b>329.317</b>	<b>354.638</b>

The other audit related fees provided of the Auditor included the following Service:

- ISAE 3402 Report for the period from January 1, 2024 to December 31, 2024

The tax fees in relation to the financial year included the following services:

- Preparation of tax returns;
- Preparation of VAT returns;
- VAT services - compliance of VAT treatment applicable to KYC investor services.



## NOTE 32 - FINANCIAL INSTRUMENT DISCLOSURES

### 32.1. Primary non-trading financial instruments

As at December 31, 2024, the analysis of primary non-trading financial instruments (the Bank has no trading portfolio) by class and residual maturity is the following:

	≤ 3 months	> 3 months ≤ 1 year	> 1 year ≤ 5 years	> 5 years	Total
At carrying amount in USD	USD	USD	USD	USD	USD
<b>FINANCIAL ASSETS</b>					
<b>Instrument class</b>					
Balances with the BCL (including BCL reserve)	3.286.867.465	0	0	0	3.286.867.465
Treasury bills and similar securities	0	199.832.228	0	0	199.832.228
Loans and advances to credit institutions	2.655.900.236	1.638.591.298	0	0	4.294.491.534
Loans and advances to customers	4.714.184	0	0	0	4.714.184
Shares and other variable yield securities	0	0	0	0	0
Other Assets	0	0	0	0	0
<b>Total Financial Assets</b>	<b>5.947.481.885</b>	<b>1.838.423.526</b>	<b>0</b>	<b>0</b>	<b>7.785.905.411</b>
<b>FINANCIAL LIABILITIES</b>					
<b>Instrument class</b>					
Amounts owed to credit institutions	2.506.417.471	0	0	0	2.506.417.471
Amounts owed to customers	4.535.446.327	0	0	0	4.535.446.327
<b>Total Financial Liabilities</b>	<b>7.041.863.798</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7.041.863.798</b>
<b>Off-balance sheet items disclosed as contingencies Guarantees</b>					
	89.985	0	0	0	89.985
<b>Total Guarantees</b>	<b>89.985</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>89.985</b>



As at December 31, 2023, the analysis of primary non-trading financial instruments (the Bank has no trading portfolio) by class and residual maturity is the following:

	≤ 3 months	> 3 months ≤ 1 year	> 1 year ≤ 5 years	> 5 years	Total
At carrying amount in USD	USD	USD	USD	USD	USD
<b>FINANCIAL ASSETS</b>					
<b>Instrument class</b>					
Balances with the BCL (including BCL reserve)	2.935.193.869	0	0	0	2.935.193.869
Loans and advances to credit institutions	2.202.093.277	1.414.630.785	0	0	3.616.724.062
Loans and advances to customers	7.905.238	0	0	0	7.905.238
Shares and other variable yield securities	0	0	0	2.738	2.738
Other Assets	0	0	0	0	0
<b>Total Financial Assets</b>	<b>5.145.192.384</b>	<b>1.414.630.785</b>	<b>0</b>	<b>2.738</b>	<b>6.559.825.907</b>
<b>FINANCIAL LIABILITIES</b>					
<b>Instrument class</b>					
Amounts owed to credit institutions	2.072.466.179	0	0	0	2.072.466.179
Amounts owed to customers	3.815.550.822	0	0	0	3.815.550.822
<b>Total Financial Liabilities</b>	<b>5.888.017.001</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5.888.017.001</b>
<i>Off-balance sheet items disclosed as contingencies Guarantees</i>					
	88.703	0	0	0	88.703
<b>Total Guarantees</b>	<b>88.703</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>88.703</b>





### 32.2. Derivative non-trading financial instruments

As at December 31, 2024, the analysis of OTC derivative non-trading financial instruments (the Bank has no trading portfolio) by class and residual maturity is the following:

	≤ 3 months	> 3 months ≤ 1 year	> 1 year ≤ 5 years	> 5 years	Total	Fair value
At carrying amount in USD	USD	USD	USD	USD	USD	USD
<b>FINANCIAL ASSETS</b>						
<b>Instrument class</b>						
<i>Foreign exchange transactions</i>						
Forwards	1.502.893.757	0	0	0	1.502.893.757	30.015.653
Swaps	2.828.974.903	0	0	0	2.828.974.903	26.209.809
<b>Total Financial Assets</b>	<b>4.331.868.660</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4.331.868.660</b>	<b>56.225.462</b>
<b>FINANCIAL LIABILITIES</b>						
<b>Instrument class</b>						
<i>Foreign exchange transactions</i>						
Forwards	1.537.068.361	0	0	0	1.537.068.361	30.000.897
Swaps	155.717.393	0	0	0	155.717.393	752
<b>Total Financial Liabilities</b>	<b>1.692.785.754</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1.692.785.754</b>	<b>30.001.649</b>

These amounts include OTC derivative non-trading financial instruments with a trade date before December 31, 2024 and a value date after December 31, 2024.



As at December 31, 2023, the analysis of OTC derivative non-trading financial instruments (the Bank has no trading portfolio) by class and residual maturity is the following:

	≤ 3 months	> 3 months ≤ 1 year	> 1 year ≤ 5 years	> 5 years	Total	Fair value
At notional payable amount in USD	USD	USD	USD	USD	USD	USD
<b>FINANCIAL ASSETS</b>						
<b>Instrument class</b>						
<i>Foreign exchange transactions</i>						
Forwards	1.732.460.231	0	0	0	1.732.460.231	12.817.030
Swaps	1.589.457.158	0	0	0	1.589.457.158	3.516.149
<b>Total Financial Assets</b>	<b>3.321.917.389</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3.321.917.389</b>	<b>16.333.179</b>
<b>FINANCIAL LIABILITIES</b>						
<b>Instrument class</b>						
<i>Foreign exchange transactions</i>						
Forwards	1.738.235.564	0	0	0	1.738.235.564	12.798.135
Swaps	1.253.765.427	0	0	0	1.253.765.427	27.860.760
<b>Total Financial Liabilities</b>	<b>2.992.000.991</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2.992.000.991</b>	<b>40.658.895</b>

These amounts include OTC derivative non-trading financial instruments with a trade date before December 31, 2023 and a value date after December 31, 2023.



### 32.3. Information on credit risk on primary non-trading financial instruments

As at December 31, 2024 the Bank is exposed to the following credit risk on primary non-trading financial instruments:

	2024 Carrying amount in USD	2023 Carrying amount in USD
<b>FINANCIAL ASSETS</b>		
By instrument class and geographic location		
<b>Cash, balances with the BCL</b>	<b>3.286.867.465</b>	<b>2.935.193.869</b>
Of which BCL minimum reserve	69.995.793	58.781.214
EU member countries	3.286.867.465	2.935.193.869
<b>Treasury bills and similar securities</b>	<b>199.832.228</b>	<b>0</b>
North & Central America	199.832.228	0
<b>Loans and advances to credit institutions</b>	<b>4.294.491.534</b>	<b>3.616.724.062</b>
EU member countries	436.090.034	335.748.290
North & Central America	139.883.453	53.432.726
Asia	3.513.421.323	3.041.245.689
Europe, non-EU member countries	187.938.468	172.124.952
Australia and New Zealand	17.158.256	14.172.405
<b>Loans and advances to credit institutions</b>	<b>4.714.184</b>	<b>7.905.238</b>
EU member countries	988.290	10.844
North & Central America	3.697.764	7.894.383
Asia	0	11
Europe, non-EU member countries	28.130	0
<b>Shares and other variable yield securities</b>	<b>0</b>	<b>2.738</b>
EU member countries	0	2.738
<b>Other Assets</b>	<b>828</b>	<b>690</b>
EU member countries	828	690
<b>Total</b>	<b>7.785.906.239</b>	<b>6.559.826.597</b>



### 32.4. Information on derivative non-trading financial instruments

As at December 31, 2024, the Bank is exposed to the following credit risk on derivatives non-trading financial instruments:

	2024 Notional/payable amount in USD	2024 Risk equivalent amount in USD
<b>FINANCIAL ASSETS</b>		
By instrument class and geographic location		
<b>Foreign exchange transactions</b>		
<b>Forwards</b>		
EU member countries	116.880.770	167.935
America	1.280.350.167	27.061.976
Asia	80.506.769	1.112.478
Europe, non-EU member countries	25.156.049	1.673.263
<b>Swaps</b>		
Europe, non-EU member countries	2.828.974.905	26.209.809
<b>Total</b>	<b>4.331.868.660</b>	<b>56.225.461</b>

As at December 31, 2023, the Bank is exposed to the following credit risk on derivatives non-trading financial instruments:

	2023 Notional/payable amount in USD	2023 Risk equivalent amount in USD
<b>FINANCIAL ASSETS</b>		
By instrument class and geographic location		
<b>Foreign exchange transactions</b>		
<b>Forwards</b>		
EU member countries	3.386.292	96.936
America	81.465.147	1.102.919
Asia	264.357.581	3.211.972
Europe, non-EU member countries	1.383.251.211	8.405.204
<b>Swaps</b>		
EU member countries	1.589.457.158	3.516.149
<b>Total</b>	<b>3.321.917.389</b>	<b>16.333.180</b>



### NOTE 33 - SUBSEQUENT EVENTS

The Bank is not aware of any adjusting or non-adjusting event that would have occurred between December 31, 2024 and the date when the present annual accounts were authorised for issue.

### NOTE 34 - CONTINGENCIES

As it may occur in the normal course of business, the Bank is occasionally subject to certain claims. The outcome of litigations is intrinsically uncertain. The likelihood of any material claim being found in favour of a claimant for the litigation currently in process is viewed as remote by the Management; accordingly, no related provisions are made in these annual accounts. Should a reliable evaluation of a past event be possible, the respective provision will be made.

### NOTE 35 - PILLAR TWO

The entity belongs to a group that falls within the scope of Pillar Two. Pillar Two legislation has been enacted in Luxembourg and applies to the Company, as it falls within its scope. This legislation came into effect for fiscal years starting on or after December 31, 2023.

Under this framework, the Luxembourg Constituent Entities of the Group are required to pay a top-up tax corresponding to the difference between the effective Pillar Two Luxembourg tax rate and the minimum threshold of 15%.

The Group has conducted an impact assessment of the transitional Country-by-Country Reporting (CbCR) safe harbour rules and concluded that the Luxembourg Constituent Entities are expected to comply with the simplified Effective Tax Rate (ETR) test. As a result, these entities should not be subject to any top-up tax or Qualified Domestic Minimum Top-up Tax (QDMTT) in 2024.

### NOTE 36 - RETURN ON ASSETS ("ROA")

The Bank's return on assets is as follows:

	2024 USD	2023 USD
Total assets	7.891.504.120	6.638.031.293
Profit of the financial year	114.746.918	97.882.738
<b>Return on Assets</b>	<b>1.45%</b>	<b>1.47%</b>



# APPENDIX 1: IFRS REPORT

(non audited information)

## APPENDIX A: Reconciliation table

Reconciliation from the accounting prudential reporting as of December 31, 2024 to the annual accounts as of December 31, 2024

Equity	LUX_GAAP 31/12/2024 USD	ADJ. TO IFRS	IFRS 31/12/2024 USD
<b>Issued capital</b>			
Paid in capital	187.117.966	-	187.117.966
Unpaid capital which has been called up			
<b>Share premium</b>			
<b>Other Equity</b>			
Equity component of compound financial instruments			
Other equity instruments			
<b>Revaluation reserves and other valuation differences on:</b>			
Tangible assets			
Intangible assets			
Hedge of net investments in foreign operations (effective portion)			
Foreign currency translation			
Cash flow hedges (effective portion)			
Available for sale financial assets			
Non-current assets and disposal groups held for sale			
Other items			
<b>Reserves (including retained earnings)</b>			
Reserves			
Legal reserve			
Other reserves	463.212.940	-	463.212.940
Retained earnings			
Result brought forward (previous years)	470.846	174.536	645.382
Result of the year	<b>114.746.918</b>	<b>(391.128)</b>	<b>114.355.790</b>
<b>Difference arising from the application of the equity method</b>			
<b>Total equity</b>	<b>765.548.670</b>	<b>(216.592)</b>	<b>765.332.078</b>





## APPENDIX B: Explanation of adjustments

The transition from LUX GAAP to IFRS financial statements affects the Bank's financial position at December 31, 2024, for the revaluation of derivatives and for the application of IFRS 9 (Impairment on Financial Assets) and IFRS 16 (Leases).

The adjustments to LUX GAAP may be presented as follows:

### 1) Financial assets held for trading / Financial liabilities held for trading

- a) Under LUX GAAP the Bank has recorded under the Assets item "Other accrued income", the neutralisation revaluation result on the spot foreign exchange positions as at December 31, 2024, i.e. USD 24.854.537.

As at December 31, 2024, the Bank has recorded under the assets item "Other accrued income" under "Prepayment and Accrued income", the accrued interest receivable on swaps for the last days of December 31, 2024, for an amount of USD 1,016.193.

For the purpose of FINREP, this neutralisation was reversed to the Profit and Loss account. These swaps are revalued together with transactions made on behalf of clients as in point b) below.

The adjusting entry is as follows:

- i. Transfer of neutralisation of swap to Transitional accounts

DR - Accruals and deferred income	USD	24.854.537
CR - Transitional accounts	USD	24.854.537

- ii. Transfer of neutralisation of swap interest receivable to Transitional accounts

DR - Transitional accounts	USD	1.016.193
CR - Prepayment and accrued income	USD	1.016.193

- b) Financial assets/liabilities held for trading are made up of the fair value of swaps and foreign exchange transactions made on behalf of clients for which the Bank has entered always in a reverse operation, in order to close the underlying position of the swaps made for own portfolio of the Bank as mentioned in point a) above. The adjusting entry is as follows:

DR - Financial assets held for trading - Derivatives	USD	55.209.269
DR - Profit and Loss Account	USD	437.224
CR - Retained earnings	USD	790.307
CR - Financial Liabilities held for trading - Derivatives	USD	54.856.186



- c) Impact of IFRS 9 Impairment: As of December 31, 2024, the impairment calculation generated a loss allowance on Cash Balance and on Financial Assets at amortised cost.

The adjusting entry is as follows:

CR - Financial assets at amortised cost - loan and advance	USD	603.741
DR - Retained Earnings	USD	498.061
DR - Profit and Loss Account	USD	105.680

- d) Impact IFRS 16: With effect from 1 January 2019, the Bank implemented IFRS 16 Leases. Hence, the Bank recognised all of its leases on the balance sheet as right-of-use assets and lease liabilities, in accordance with this accounting standard.

The adjusting entry is as follows:

DR - Property, Plant and Equipment	USD	3.125.711
CR - Lease liabilities (Financial liabilities amortised at cost)	USD	3.150.645
DR - Retained earnings	USD	46.710
CR - Profit and Loss Account	USD	21.776

**The impact from the adjustments a), b), c) and d) on the result of the year is a loss of USD 521.128 (21.776-105.680-437.224).**

**The Bank recorded the assets deferred taxes on this amount, which amounted for USD 130.000 calculated at the rate of 24.94 % (Corporate Tax in 2024).**

The adjusting entry is as follows:

DR - Deferred tax assets	USD	59.000
DR - Retained earnings	USD	71.000
CR - Profit and Loss Account	USD	130.000

**Hence, the net impact (after tax) is a loss of USD 391.128 (-521.128+130.000).**



## APPENDIX 2: BASEL III DISCLOSURE (non audited information)

### I. Introduction

This report has been created in compliance with E.U. Directive 2013/36/EU of June 26, 2013, and E.U. Regulation 575/2013 of the same date.

Basel III differentiates between three so-called pillars, which are expected to be mutually reinforcing:

- Pillar 1 is centred on the capital requirements related to the credit, market and operational risks that banks run;
- Under Pillar 2, banks are expected to produce their own assessment of capital adequacy, based on the risks that they face in their activities, including additional risk types such as market risk in the banking book. Pillar 2 also lays out the interaction between the banks' own assessments and the banking supervisors' response;
- Pillar 3 leverages the ability of market discipline to motivate prudent management by enhancing the degree of transparency in banks' public reporting. It sets out the public disclosures that banks must make that lend greater insight into the adequacy of their capitalization. The purpose of Pillar 3 is to complement the minimum capital requirements (Pillar 1) and the supervisory review process (Pillar 2).

Pillar 3 disclosures comprise of:

- Quantitative disclosures relating primarily to actual risk exposures
- Qualitative disclosures relating primarily to risk management practices

Additional qualitative disclosures are applied by enclosing a summary of the Remuneration Policy.

As at December 31, 2024, this disclosure Statement includes the measures required by the full adoption of the Basel III capital reforms. Basel III is a global regulatory standard on bank capital adequacy, stress testing and market liquidity risk, intended to strengthen bank capital requirements and introduces new regulatory requirements on bank liquidity and bank leverage.

Mitsubishi UFJ Investor Services & Banking

(Luxembourg) S.A. (hereafter "MIBL" or "the Bank"), a member of Mitsubishi UFJ Financial Group (hereafter "MUFG"), whose Head Office (a financial holding company) is located in Japan, has undertaken to carry out the full disclosure required by the above-mentioned regulations. Disclosure will be made on an annual basis.

The report may be obtained after the publication of the Annual Accounts, from the following address: Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A. 287-289, route d'Arlon, L-1150 Luxembourg.

### II. Overview

Due to various changes in the global market and current trends in investment funds, it is constantly necessary to adapt the business model. As per client requests, new client services have been implemented which further broaden the scope of oversight and the importance of Risk Management at MIBL.

The Bank updates and implements in its policies, procedures, and processes, methods to identify, categorize, measure, monitor, and mitigate the risks linked to its business lines. The Bank remains risk averse and does not engage in proprietary trading for its own account.

As regards its capital adequacy, MIBL has a robust capital structure basically made of Tier 1 capital which covers both Pillar I and Pillar II requirements.



2024 Capital Requirements	Pillar I Regulatory Capital Requirements	Pillar II Internal Assessment of Capital Requirements
Credit Risk	163.116.062	8.690.134
Market Risk	0	35.344.918
Operational Risk	22.823.385	22.300.529
Climate & Environmental Risks	0	1.041.031
<b>Capital Requirement (<math>\Sigma</math>)</b>	<b>185.939.447</b>	<b>67.376.612</b>
<b>Total Capital requirement</b>	<b>253.316.059</b>	
Tier 1 Capital	<b>645.801.472</b>	
<b>Headroom against Capital Requirement</b>	<b>459.862.025</b>	<b>392.485.413</b>
Headroom against Capital Requirement ( $\Delta$ )	<b>71,21%</b>	<b>60,77%</b>

Table 1: Pillar I and Pillar II capital requirements

### III. Concise Risk Statement

As per Article 435 (1) point (f) CRR, the General Management of MIBL has approved the concise risk management statement. In this respect, MIBL risk management strategy is designed to ensure that the business is performed within a controlled risk framework and in alignment with Head Office Corporate Risk Management Division's guidelines.

In order to achieve its objectives in a sustainable and a controlled manner, MIBL's Risk Appetite Statement (R.A.S.) defines the early warning alerts, limits and thresholds for each of the risk categories the Bank is exposed to. On January 29, 2025 MIBL's Board of Directors approved the Risk Appetite Statement which provides a comprehensive description said limits and thresholds. The actual risk exposures are monitored vis-à-vis the R.A.S. limits by Risk Management Department, ensuring timely escalation of deviations to General Management, Risk Management Committee and to the Board of Directors when appropriate.

As a basic principle, MIBL is risk averse and does not engage in proprietary trading for its own account. MIBL's selective and conservative risk-taking approach is reflected in the guidelines of risks that are not permitted:

- where the Bank has an ongoing concern and is put at risk;
- where risks are likely to damage the Bank's reputation, including risks inherent in businesses which are illicit, unlawful or non-ethical encompassing criminal offences such as financing of terrorism, trafficking of arms, drugs, human beings, money laundering, corruption, or business with ethically questionable business partners;
- where the risk-return trade-off is adverse, and the Bank is not adequately compensated for its risk taking.
- where the Bank does not fully understand the business or where the Bank's capacity to properly oversee and control the risks is not given.
- where such business is out of scope of the Bank's authorization granted by local regulators, including, but not limited to, transactions in equity derivative instruments.

Apart from the above no-business rule, the Bank could consider entering into business and taking risks on a case-by-case basis where specific minimum requirements are met. One basic minimum requirement is that sufficient capital or own funds, is available to cover the risks taken and the Bank's risk bearing capacity is not exhausted. For simplicity, this basic minimum requirement is denoted as golden rule of risk taking.

The Bank has built a robust governance framework, based on 3 lines of defence model which defines roles, responsibilities and segregation of duties. Risk Management Department, belonging to the 2<sup>nd</sup> line of defence is



responsible to update and maintain the R.A.S., Policies, Procedures and Manuals defining the methodology and techniques used to oversee each of the risk categories. Risk Management Department performs a close oversight of exposures at all times and escalates deviations in the R.A.S. in due time.

The table below summarizes the documents that describe the Bank's risk framework, profile, tolerance, strategy, methodologies for identifying and quantifying risk exposures as defined in its Risk Appetite Statement.

Topic	Related document	Approval date
Profile	Risk Management Policy	12/12/2024
Tolerance	Risk Appetite Statement	29/01/2025
Strategy	Risk Strategy	29/03/2025
Management of risks	Internal Capital & Liquidity Adequacy Assessment (ICLAAP)	29/03/2025
	Risk Management Plan	29/01/2025
	Risk Management Report	29/03/2025
Key ratios	Quantitative Risk Appetite Statement	21/03/2025
	Business Recovery Plan's Recovery Indicators	26/06/2025
Relevant governance documentation for major risk categories	Risk Management Policy	12/12/2024
	Operational Risk Policy	30/08/2024
	Outsourcing & ICT Third Party Risk Policy	26/09/2024
	Climate Risk Policy	17/02/2025
	New Business & Product Acceptance Policy	21/01/2025
	Information Security Policy	27/02/2025

As per Art. 345 (1) f. i) the Bank provides a comprehensive view of the relevant ratios and figures in section XI Regulatory Capital Requirements, Table 9 EU KM1.

In accordance to Art. 345 (1) f. ii) the Bank provides information on intragroup exposures with related parties which are considered within the risk appetite and overall risk strategy.

	USD eq.
Assets	8.156.999.004
MUFG group related	3.789.070.434
Banque Centrale du Luxembourg	3.286.867.465
Non-MUFG group	1.081.061.105

	USD eq.
Liabilities	7.509.379.564
MUFG group entities	3.184.508.278
Non-MUFG group	4.324.871.286
Own Funds	647.619.440

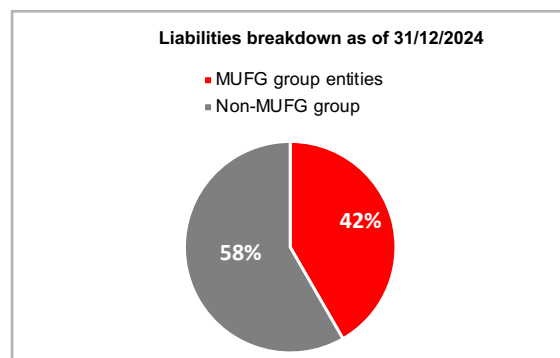
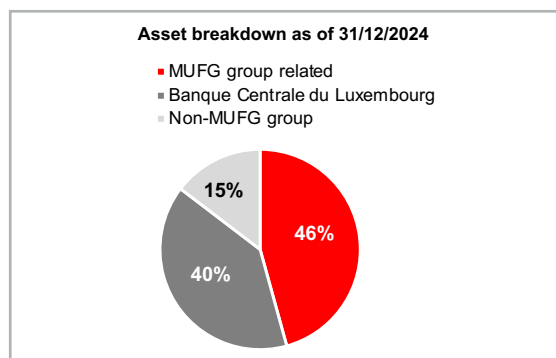


Table 2: concise risk management statement



As per Art 451. a (4) i. of the CRR, the General Management of MIBL has approved the concise liquidity risk statement with the aim to provide a succinct description of the liquidity management strategy, metrics and tools in place. In this respect, MIBL is compliant with the regulatory requirements having tools and measures in place to oversee, manage and escalate liquidity issues in due time. In 2024, the Bank had no liquidity shortages and kept enough intraday liquidity buffers to afford any potential unexpected cash withdrawals.

As a general statement, the Bank's liquidity risk management is prudent and conservative, ensuring that client's cash deposits are available and ready to meet their instructions and commitments at all times (security activity, either settlement, purchases, payments, etc). Client's cash deposits are invested either on an overnight basis at the Banque Centrale du Luxembourg or up to 1 year either with MUFG group entities or with highly rated credit institutions.

As regards business-as-usual liquidity management, the 1<sup>st</sup> line of defence, namely Treasury Department is responsible to execute prudent management of all cash positions in segregated nostro accounts and correspondent banks, allocating the liquidity excess as short-term cash placements with MUFG entities.

On the other hand, the 2<sup>nd</sup> line of defence, namely the Risk Management Department is responsible of monitoring cash positions in nostro account, allocation and maturities, of cash placements, short terms FX swap with highly rated credit institutions. Risk Management Department is responsible to oversee the alignment of actual liquidity management vis-à-vis:

- Liquidity risk indicators in the Risk Appetite Statement: LCR, NSFR, Liquidity Gap Ratio. Liquidity Risk Management Policy
- Funding Liquidity Risk Management Procedure
- Intraday Liquidity Risk Management Procedure (BCBS 248)
- LCR user guide manual.

Any breaches or deviations in the liquidity risk framework (indicators, KPI, liquidity management) are escalated by Risk Management Department to the General Management and if applicable to the Board of Directors. Strategic liquidity risk discussions are held at the monthly Credit & ALM Committee and then reported to the Board of Directors at the quarterly meeting.

#### **IV. Adequacy of risk management arrangements, Article 435 (1) point (e) CRR.**

For the purpose of Article 435 (1) (e) CRR, the General Management of MIBL concluded that the Risk Management systems are effective and adequate with the risk profile and strategy of the Bank.

#### **V. Risk Classification**

The Bank has identified the following risks present in its businesses and operations:

##### **1. Credit Risk**

Credit Risk defined as the risk to incur losses due to a decline in, or a total loss of, the value of assets (including off-balance sheet assets) as a result of a counterparty failing to meet its obligations in accordance with agreed terms. Given the nature of MIBL business, credit risk is mainly defined by two sub-categories:

- **Counterparty (default) risk** – covering settlement risk, counterparty default on FX market exposure (generating replacement costs) or cash placements at risk due to counterparty default.
- **Country risk** – arising from uncertainties in economic, social, political or other external factors that could have an impact, such as a downgrade of the credit rating.
- **Credit Value Adjustment** – arises as the risk of decreasing mark to market value of the derivatives. The derivatives done in 2024 by the Bank were mainly FX Forwards and FX Swaps. As of December 2024 the Bank does not hold any proprietary derivative positions.

##### **2. Concentration Risk**

The risk of an accumulation of exposure(s) within or across different risk categories of an institution that have the potential to produce either losses large enough to threaten the institution's health and/or ability to maintain its operations, or to produce a material change in an institution's risk profile.

The Bank reports on monthly basis the analysis concerning the concentration risk during its Risk Management Committee. The analysis draws attention to the credit and market exposures that the Bank needs to face, sorting the exposures by counterparty, type, rating, and currency.





### 3. Market Risk

Market Risk defined as the risk of financial loss due to a decline in the value of assets, or the increase in the value of liabilities, including off-balance sheet items, as a result of fluctuations in market rates (FX rates, interest rates), prices, indices, and volatilities. The Bank has defined three general sub-categories of Market Risk, namely:

- **Interest Rate Risk** – arises from changes in interest rates; both assets and liabilities may impact the profitability of the Bank.
- **Foreign Exchange Rate Risk** – defined as the risk of a loss following changes in the market foreign exchange rate on the Bank's transactions.
- **Credit Spread Risk** - is the risk driven by changes of the market price for credit risk or changes in an instrument's credit spread. CSRB measures changes in credit spreads or changes in the premium required by market participants for a given credit quality.

### 4. Liquidity Risk

The Bank has identified two types of liquidity risk: market liquidity risk and funding liquidity risk.

- **Market Liquidity Risk** – defined as the risk of sustaining a loss due to the inability to trade required quantities at a reasonable price, caused, for instance, by market turmoil or a lack of trade volume in the market.
- **Funding Liquidity Risk** – defined as the risk of sustaining a loss due to the inability to obtain the necessary funds required for trading or settlement of obligations, or the need to acquire funds at disadvantageous terms, caused by deterioration in market conditions and/or in the Bank's financial standing.

### 5. Operational Risk

Operational Risk is defined as the risk of direct or indirect loss resulting from inadequate or failed internal process, people, and systems, or from external events. This includes:

- **Operations Risk** – defined as the risk of incurring losses caused by negligence of correct operational processing or by incidents or misconduct by officers or staff.
- **IT Risk** – defined as the risk of sustaining a loss due to IT system destruction, disruption, leakage, errors or similar events.

- **Depository risks** – defined as the risk in key areas critical to the effective provision of Depository services (product offering, safekeeping, oversight duties) to ensure that the Bank's operations align with its risk management and compliance strategies.

### 6. Outsourcing & ICT Third Party Risk

Outsourcing Risk is defined as the risk of sustaining a loss due to a failure in delegated activities, in case they are not carried out properly or in non-compliance with the contractual arrangements. MIBL outsources material activities to external service providers in the EU or within the MUFG Group as per notified to the CSSF. Outsourcing Risk is monitored by the Risk Management Department with the support of the "owners" and Legal Department. All aspects involving service provider of outsourcing activities are discussed in the monthly Risk Management Committee and reported to the Authorized Management and to the Board of Directors in compliance with EBA Guidelines and CSSF circular 25/882 and 25/883. As per DORA regulation in place since January 2025, the Bank has established a framework to identify and assess critical ICT service providers (assessments, due diligence, contractual arrangements, ICT register, incident escalation procedure, resiliency procedure among other requirements).

### 7. Climate related & Environmental (CR&E) Risk

CR&E Risks is defined as the risk arising from any kind of impact caused by climate and environmental damages materializing on the Bank's activities and its operations. MIBL recognizes the importance in addressing Environmental, Social and Governance (ESG) risks and has implemented a comprehensive framework to indefinitely, monitor and prevent the impact of climate & environmental risk on its operations and overall business. To do so and in alignment of CSSF circular 21/773 the MIBL performs a yearly materiality assessment, follows up a series of KPIs and performs a yearly stress testing exercise to calculate capital requirements under Pillar II.

Based on the materiality assessment performed in 2024 the Bank identified the main areas exposed to CR&E Risks which are: outsourcing (moderate risk) operational (moderate risk), credit risk (low-moderate risk) and business & strategy (low-moderate risk). These risk exposures are monitored by the Risk Management Department and reported to the General Management at the monthly Risk Management Committee.



## 8. Compliance & Legal Risk

Compliance and Legal risks are defined as the risks of loss due to a failure to conduct the business in accordance with applicable laws, rules, and standards or due to inappropriate or insufficient response to regulatory changes. It covers a variety of component risks such as litigations, sanctions, together with certain aspects of Operational Risks, across the complete range of the Bank's business activities.

## 9. Reputational Risk

The Bank defines reputation risk as the risk of sustaining a loss due to an impaired reputation, caused, for instance, by negative perceptions and rumours among the Bank's clients and in the general marketplace, or by an inadequate response of the Bank to events arisen within the course of the Bank's business activities. This affects the Bank's ability to establish new relationships or services or to continue existing servicing relationships.

## 10. Remuneration and Personnel Risk

Personnel risk is defined as the risk of loss due to high turnover of human resources, lack of training, lack of ethics and degradation of morale, as well as other similar behaviors. Remuneration risk is triggered by an inappropriate remuneration policy of the Bank, allowing abusive personnel compensations that are not tied to the financial results of the Bank or to the performance of its employees.

The Bank reviews the Remuneration Policy at least once a year to ensure that the principles, objectives, and methods of the policy are followed as they have been adopted. The Bank's Remuneration Policy adheres to the principles laid down in E.U. Directive 2013/36/EU, the Commission Delegated Regulations no. 604/2014 of March 4, 2014 and no. 527/2014 of March 12, 2014.

## VI. The Strategies and Processes of Risk Management

1. One of the basic functions of the Bank's Risk Control is to monitor the risks linked to the Bank's activities and business strategies that are within the control of the Board of Directors, and to the greatest extent possible to predict, mitigate, and manage the risks of the Bank using a pre-defined standard or method whenever possible.
2. The major objective of comprehensive risk control is not only to maintain preventive measures against business risks, but also to include all departments in its analysis and thereby to improve operations

through more efficient processes and systems. Other aims are to identify all potential risks the Bank may face, evaluate the scope and the appropriateness of the controls put in place to assess these risks, and determine an action plan to eliminate weaknesses.

3. The Risk Management Department utilizes and has documented detailed methods in the Bank's policies, procedures, written rules, and other documents in its efforts to monitor and manage the risks noted above. The departments where these risks are generated periodically review these written papers and amend or abolish them in accordance with changes in the Bank's operating environment.

## VII. The Structure and Organization of the Risk Management Function

### 1. The Board of Directors and General Management

The Board of Directors is responsible for deciding and approving the basic framework and strategies of the Bank's internal risk control management, implemented throughout the Bank, and to confirm its implementation.

The Board of Directors determines the usefulness and efficiency of the risk controls in place using risk control reports delivered regularly, and judges if the controls comply with the approved limits and measures.

On behalf of the Board of Directors, General Management creates a risk verification and management framework, which remains independent from the Bank's profit-earning units, and allocates the skilled management resources required for carrying out the necessary controls and functions. For this purpose, General Management establishes policies, standards, and procedures for risk control and management.

In addition, General Management reviews risk control and management plans, organization structures, policies, and procedures so that the Bank's risk management framework evolves consistently with changes in the Bank's businesses, international markets, and "Best Practices" in Risk Management.

Employees are assigned to departments and tasks according to their professional experience and academic background. These assignments are approved by the General Management.

### Chief Risk Officer

The Chief Risk Officer (hereafter "CRO") title is assigned to the director carrying out supervisory



management of the Risk Management Department (hereafter the “RMD”), which is the department responsible for comprehensive Risk Management, encompassing all risk categories. The CRO is responsible for a complete assessment of MIBL’s risks, and for managing these risks adequately. The CRO reports risk control and management methods and plans the Bank’s overall risk status to the Board of Directors, General Management, and to the Risk Management Committee.

## **2. Risk Management Department (RMD)**

The RMD is responsible for the selection and execution of an adequate risk management structure. On a daily basis, the department identifies, measures, controls, and monitors all risks within defined and controllable limits. These actions attenuate risks across MIBL’s businesses, and thereby provide stability to earnings and risk awareness in the allocation of resources.

## **3. Risk Management Committee**

The primary responsibility of the Risk Management Committee is to review, discuss, and approve the Bank’s Risk Management activities. In particular, and in congruence with the Bank’s businesses, the Committee discusses Financial Risks, Third Party & Outsourcing Risks, Operational Risk, Climate & Environmental Risks and IT & Information Security Risks and puts forth policies to avoid losses due to these risks. Its members discuss quantitative, as well as qualitative, methods of managing the Bank’s risks.

## **4. Credit and ALM Committee (For Credit Risk, Market Risk, and Liquidity Risk)**

The primary responsibility of the Credit and ALM Committee is to establish an appropriate implementation and a functioning management structure for Credit Risk, Market Risk, and Liquidity Risk. On a monthly basis, its members monitor, and if necessary, make decisions regarding, both MIBL clients’ assets and the Bank’s assets.

## **VIII. The Scope and Nature of Risk Reporting and Measurement Systems**

The Bank’s process for control and managing its diverse categories of risk comprises several levels and phases. A non-exhaustive description of its methodology follows:

### **1. Detection of Risks**

This step includes the identification of the characteristics of the Bank’s individual risks, which include, but are not limited to, their type(s), location(s), source(s), and interdependency (ies).

### **2. Risk Assessment and Computation**

This step includes a comprehensive evaluation of the source of risk, using both quantitative and non-numerical methods, at the transaction, portfolio, and overall structure levels of the individual risk.

### **3. Risk Control**

Risk Control at MIBL involves the process of examining and updating approvals, limits, thresholds, operational processes (for example, standing instructions), escalation processes (and exceptional treatment rules), and risk attenuation methods (haircuts, collateral, netting calculations, ratings, etc.). These are contained and updated in MIBL policies, rules, procedures, and practices. MIBL’s Head Office, E.U. regulations, CSSF circulars and regulations, and Luxembourg laws also act as inputs into MIBL’s policies.

### **4. Risk Monitoring and Reporting**

The Risk Management Department is responsible of updating the risk processes, monitoring of the risk status and exceptional treatment of individual risks, and reports to General Management and Risk Management Committee. The Committee reports to the Board of Directors on a quarterly basis.

## **IX. The Policies for Mitigating Risk and the Process for Monitoring Risks**

### **1. Credit Risk Monitoring**

The Bank is exposed to counterparty risk, as major component of credit risk, via: overdrafts, money market and foreign exchange market transactions. Potential losses are mitigated via the following methods:

- active follow-up of failed transactions
- active follow-up of overdrafts
- reconciliation of nostro accounts
- development of an active approach towards cash management.

The Pillar 1 capital requirement sufficiently covers the Credit Risk profile of the Bank.



### **Credit Exposure and Limit Monitoring**

The Bank's credit risk monitoring framework allows RMD to verify on-demand the Bank's credit exposures and their impact on authorized credit limits. The RMD carries out verifications of the current credit exposure compared to the approved credit limit. The report indicates a "warning," e.g. a color signal, when the usage of the limit is above 80% of the total limit amount. In this event, the RMD transmits a message to the appropriate department to take remedial action as soon as possible. If the limit is breached, a report is forwarded to the General Management.

The Bank uses a banking system which allows an on-demand monitoring of credit limits. All transactions that would transgress the relevant credit limit put in place cannot be processed without the express authorization of the Risk Management Department. The control on credit limit breaches is made possible through the "Visa Control" system put in place by the Bank. In the event the RMD is requested to approve using Visa Control, an exhaustive analysis of the credit limit breach is carried out. The result of this analysis will be transmitted to General Management before releasing or rejecting the transaction.

### **Credit Limit by Counterparts**

The Bank applies for limits to Mitsubishi UFJ Trust and Banking Corporation (hereafter "MUTB"), following the approval of the General Management.

### **Credit Limit Control**

The RMD controls the Bank's credit limits. Once the credit limit has been authorized by MUTB, the RMD forwards the approval to the General Management. All approved limits are set up in the Banking system. The RMD reviews these limits once a year, or more frequently as necessary (e.g., in case of breach).

### **Monitoring Credit Rating for Counterparts**

The Bank verifies the credit ratings of all counterparts that have a deal or custody agreement with the Bank.

### **Credit Risk Stress Testing**

The Bank put in place a Credit Risk Stress Test model, using macro-economic and financial market data (e.g. GDP, unemployment rates, interest rates, FX rates, exchange indices, bankruptcy indices etc.) to infer stress factors applied on the Probability of Defaults (PDs) and create a credit loss distribution.

For the stress test, the methodology used is based on results comparing 90% VaR, 95% VaR and 99% VaR (the latest one is the worst case).

### **Country Risk Monitoring**

The RMD monitors the counterparts' country risk by checking country ratings using a Bloomberg Station.

### **Capital requirements**

The Bank uses the Standardized Approach for Credit Risk, wherein each exposure is assigned to an exposure class. The application of risk weights is based on the exposure class to which the exposure is assigned and its credit quality.

The Credit Risk Pillar II is derived primarily from the transactions in cash placement, the overdrafts (occurred mainly by settlement failures) and FX Forwards (the latter are undertaken to mitigate client Foreign Exchange Risk at the request of the customer).

For 2024 Pillar II credit risk capital requirements the scenario with the maximum loss was considered, with an amount of USD 8,690,134.-

## **2. Market Risk Monitoring**

### **Interest Rate Risk in the Banking Book (IRRBB)**

Interest Rate Risk may be defined as the risk of loss due to the "gap" (i.e. difference) between assets and liabilities on the Balance Sheet that are exposed to interest rate fluctuations. Interest rates are influenced by a variety of factors, such as politics, international news, and the general economic climate of countries.

The Bank's Interest Rate Risk exposure arises from the normal course of its banking activities, such as accepting deposits, placing funds with credit institutions. The objective of the Bank regarding Interest Rate Risk is to minimize potential losses by monitoring fixed rate interest positions. The Bank has just the risk of an opportunity cost for its gap (i.e. cash) placement (i.e. not being able to re-invest at higher interest rates should they occur during a previously contracted fixed-rate loan).

The Bank has adopted a full cover principle for all interest rate-related contracts. The maximum risk allowed is determined by the Authorized Management.

The Bank performs sensitivity analysis on its economic values taking into account positive and negative shifts on all interest rates (200bp parallel shift of yield curves) as defined by CSSF Circular 08/338 as amended by CSSF Circular 16/642. As specified within the CSSF circular 20/762 and as explained within the guidelines EBA/GL/2018/02, the Bank has also performed six additional stress test scenarios and reported the results. The aim of



this analysis is to determine to which extent Interest Rate Risk is likely to result in a decline in the economic value of the institution. The Bank applies interest rate shocks to all its treasury flows considering the following parameters: residual maturity, contract rate, market rate, and nominal amount.

International changes, such as the trend toward the liberalization of interest rates in the developing world and large money movements into speculative funds in recent years, have added a higher variability to interest rates than they showed in previous years. This has caused Asset & Liability Management to take on a relative position of importance in Risk Management.

For 2024 Pillar II market risk capital requirements, the IRRBB loss was considered, with an amount of USD 29,258,388.

### **Credit Spread Risk in the Banking Book**

As regards the “Credit Risk Spread Risk for non-trading activities in the Banking Book” (CSRBB) as per Article 53-20 of the Law of April 5, 1993 (EBA/GL/2022/14 and CSSF circular 24/848), the Bank has assessed the impact of its credit spread sensitiveness and repricing risk. MIBL’s major credit exposures are concentrated in BCL (52%) and Mitsubishi UFJ Trust and Banking (37%) totalling 89%. As part of its CSRBB impact assessment, the Bank included only its exposures to Mitsubishi UFJ Trust and Banking (Rating A) and US Treasury T-Bills (Rating AA) while excluding overnight maturities – including its exposures to BCL – since these are not materially impacted by CSRBB. The average duration of exposures in scope is 6 months, meaning that a downgrade of these counterparties could trigger a relatively quick repricing of credit spreads, limiting potential margin compression. Moreover, the CSRBB impact linked to market-driven spread fluctuations would also remain relatively contained given the short duration. Below is a summary of the CSRBB impact assessment on EVE. As per the Risk Appetite Statement, results of CSRBB must not exceed 3% of own funds.

Type	Rating	Nominal Value (USD)	Impact on EVE	Impact (%) on EVE
Loans	A	2.182.000.000	-5.477.703	-0,72%
Securities	AA	199.000.000	-608.826	-0,08%
		<b>5.940.571.027</b>	<b>-6.086.530</b>	<b>-0,80%</b>

Table 3: CSRBB impact assessment on EVE

### **Foreign Exchange Rate Risk**

The Bank enters into foreign exchange positions as a result of opening FX trades on behalf of its clients. These trades are then hedged in the Interbank Market at the same time without taking on any market risk. Thus, Currency Risk is managed on a timely basis on spot and forward markets. The Bank’s policy is to maintain a “full cover” of all transactions. The RMD carries out daily verifications to ensure that all the Bank’s positions are fully hedged.

#### Daily Control

In general, the total foreign exchange position of the Bank is equal to 0 (or “squared”) at the end-of-business each day. A maximum net position of 500,000 USD is allowed at day’s end when, due to client transactions, this amount could not be squared. As a matter of practice, the Bank seeks to have the entire FX position squared to the furthest extent possible.

As part of its daily controls, the RMD issues the “Forex Net Short Position Report” (showing the Bank’s daily spot transactions).

As a matter of practice, and due to its risk-averse stance in its businesses, the Bank has virtually no other market risks, i.e. no stock prices risk, commodity price risk, or market liquidity risk.

The Bank has also put in place a FX Stress test that quantifies the potential losses that could be incurred by the Bank in case of significant variation of the FX rates and lack of hedging strategy. The FX stress test is defined using different scenarios where a depreciation of the USD is always assumed using different magnitudes with respect to other currencies.





### 3. Liquidity Risk Monitoring

The Bank's transactions are continuously monitored with respect to their adherence to its internal liquidity rules and to the current regulations in place. The Liquidity Coverage Ratio (LCR) ensures that banks have an adequate stock of unencumbered high-quality liquid assets (HQLA) that can be converted easily and immediately in private markets into cash to meet their liquidity needs for a 30 calendar day liquidity stress scenario. Along 2024 the Liquidity Coverage ratio was well above the minimum requirement.

<b>LIQUIDITY COVERAGE RATIO (LCR) AS OF 31/12/2024</b>	<b>USD</b>
A. High Quality Liquid Assets	3.417.828.894
B. Inflows	2.102.689.446
C. Outflows	4.287.857.900
D. Capped Inflows (Max 75% Outflows)	3.215.893.425
E. Inflows for LCR (Minimum (B) or (D))	2.102.689.446
F. Net Cash Flow (C) - (E)	2.185.168.454
G. Liquidity Coverage Ratio (A) / (F)	156,4%
H. Minimum Requirement as of 31.12.2024	100,00%
I. Minimum Regulatory Requirement met	<b>OK</b>

Table 4: LCR as of 31/12/2024

The Bank performs monthly stress-testing of its liquidity risk, simulating extreme market conditions in order to assure that high impact events are easily absorbed.



Scope of consolidated (solo /consol)		Total unweighted value (average)				Total weighted value (average)			
Currency and units (USD)									
EU 1a	Quarter ending on (DD Month YYYY)	31-Mar-2024	30-Jun-2024	30-Sep-2024	31-Dec-2024	31-Mar-2024	30-Jun-2024	30-Sep-2024	31-Dec-2024
EU 1b	Number of data points used in the calculation of averages	3	3	3	3	3	3	3	3
HIGH-QUALITY LIQUID ASSESTS									
1	Total high-quality liquid asset (HQLA)					2.614.622.234,32	3.115.324.603,37	3.881.677.802,63	3.594.531.539,64
CASH-OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	-	-	-	-	-	-	-	-
3	Stable deposits	-	-	-	-	-	-	-	-
4	Less stable deposits	-	-	-	-	-	-	-	-
5	Unsecured wholesale funding	5.909.439.335	6.387.011.629	7.761.230.473	7.397.189.439	2.860.941.070	3.254.363.755	4.243.795.014	3.930.703.392
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	4.062.335.700,63	4.173.846.831,39	4.688.741.900,59	4.621.694.529,49	1.015.558.032,85	1.043.430.551,11	1.172.140.302,76	1.155.414.281,09
7	Non-operational deposits (all counterparties)	1.847.103.634,31	2.213.164.797,85	3.072.488.572,35	2.775.494.909,61	1.845.383.037,19	2.210.933.203,86	3.071.654.710,95	2.775.289.111,21
8	Unsecured debt	-	-	-	-	-	-	-	-
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	15.164.379,96	55.725.187,25	143.078.142,41	113.827.137,98	15.164.379,96	55.725.187,25	143.078.142,41	113.827.137,98
11	Outflows related to derivative exposures and other collateral requirements	15.164.379,96	55.725.187,25	143.078.142,41	113.827.137,98	15.164.379,96	55.725.187,25	143.078.142,41	113.827.137,98
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	-	-	-	-	-	-	-	-
14	Other contractual funding obligations	50.432,19	68.219,60	89.854,64	903.627,18	50.432,19	68.219,60	89.854,64	903.627,18
15	Other contingent funding obligations	90.404,84	98.200,59	99.457,58	92.037,24	90.404,84	98.200,59	99.457,58	92.037,24
16	TOTAL CASH OUTFLOWS					2.876.246.287,03	3.310.255.362,40	4.387.062.468,34	4.045.526.194,70
CASH-INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	2.097.260.739,37	1.951.733.531,98	2.498.583.255,80	2.191.214.922,82	2.097.199.621,35	1.951.721.341,11	2.498.583.253,22	2.191.214.852,94
19	Othe cash inflows	20.480.870,89	13.317.146,38	13.317.146,38	38.452.543,19	20.480.870,89	13.317.146,38	23.560.767,23	38.452.543,19
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	2.117.741.610	1.965.050.678	2.522.144.023	2.229.667.466	2.117.680.492	1.965.038.487	2.522.144.020	2.229.667.396
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	2.117.741.610	1.965.050.678	2.522.144.023	2.229.667.466	2.012.633.025	1.982.082.729	2.556.250.398	2.274.159.546
TOTAL ADJUSTED VALUE									
21	LIQUITY BUFFER					2.614.622.234	3.115.324.603	3.881.677.803	3.594.531.540
22	TOTAL NET CASH OUTFLOWS					863.613.262	1.328.172.633	1.830.812.070	1.771.366.648
23	LIQUIDITY COVERAGE RATIO (%)					302,75%	234,56%	212,02%	202,92%

Table 5: EU LIQ1





### Asset & Liability Gap Placement Monitoring

MIBL's Funding Liquidity GAP is verified daily using an automated tool. The Funding Liquidity Report, issued by the tool, is sent to General Management and submitted to a "Four-Eyes" verification on a daily basis. In the daily computation of the GAP, a certain amount of "core cash" is considered to remain on clients' accounts for a longer, more stable period.

The amount of core cash at MIBL has increased to USD 3.3 Billion, based on the augmentation in customer cash accounts seen particularly since the beginning of pandemic. GAP placement limits have been set by the General Management and approved by the MUTB Head Office as follows:

Time Period	Limits
- < 1 month	1.6 Billion USD (Minimum)
- > 3 months	1.6 Billion USD (Maximum)

Term placements have a maximum maturity of 1 year, showing and limiting the risk taken by the Bank over the time. The Credit and ALM Committee monitors monthly that the Bank complies with the Gap Placement Policy.

### 4. Prudential ratios

As introduced by the requirements of Directive 2013/36/EU / Regulation EU No 575/2013), the Bank calculates and monitors the prudential ratios. Besides the LCR presented above, the Bank ensures that Net Stable Funding Ratio (NSFR) and Leverage Ratio (LR) are being monitored as per December 31, 2024 as follows:

NET STABLE FUNDING RATIO (NSFR) AS OF 31/12/2024	USD
A. Available Amount of Stable Funding	2.718.737.134
B. Required Amount of Stable Funding	1.003.806.954
C. Net Stable Funding Ratio (A) / (B)	270,84%
D. Minimum Requirement	100,00%
E. Minimum Regulatory Requirement met	OK

Table 6: NSFR as of 31/12/2024



						4Q-2024	3Q-2024	2Q-2024	1Q-2024
(in USD)		a	b	c	d	e	Weighted value	Weighted value	Weighted value
		Unweighted value by residual maturity				Weighted value			
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr				
<b>Available stable funding (ASF) Items</b>									
1	Capital items and instruments				650.976.288	650.976.288	650.976.288	650.976.288	650.976.288
2	Own funds				649.158.319	649.158.319	649.158.319	649.158.319	649.158.319
3	Other capital instruments				1.817.969	1.817.969	1.817.969	1.817.969	1.817.969
4	Retail deposits								
5	Stable deposits								
6	Less stable deposits								
7	Wholesale funding:		7.292.413.070			2.067.760.847	2.593.337.717	2.076.951.836	2.095.578.645
8	Operational deposits		4.135.214.248			2.067.607.124	2.590.744.326	2.071.623.573	2.093.172.662
9	Other wholesale funding		3.157.198.822			153.723	2.593.391	5.328.263	2.405.983
10	Interdependent liabilities								
11	Other liabilities:		67.593.200						
12	NSFR derivative liabilities								
13	All other liabilities and capital instruments not included in the above categories		67.593.200			-			
14	<b>Total available stable funding (ASF)</b>					<b>2.718.737.134</b>	<b>3.244.314.005</b>	<b>2.727.928.124</b>	<b>2.746.554.933</b>
<b>Required stable funding (RSF) Items</b>									
15	Total high-quality liquid assets (HQLA)		69.995.793			-			
EU-15a	Assets encumbered for more than 12m in cover pool								
16	Deposits held at other financial institutions for operational purposes								
17	Performing loans and securities:		3.320.060.397	1.261.986.620		962.999.350	1.101.939.191	920.862.146	941.946.089
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								
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:								
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		3.320.060.397	1.261.986.620		962.999.350	1.101.939.191	920.862.146	941.946.089
25	Interdependent assets								
26	Other assets:		62.578.910			40.807.604	19.766.664	22.125.739	28.014.824
27	Physical traded commodities								
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs								
29	NSFR derivative assets		31.333.136			25.276.659	1.954.711	7.884.519	10.906.248
30	NSFR derivative liabilities before deduction of variation margin posted								
31	All other assets not included in the above categories		31.245.774			15.530.945	17.811.953	14.241.220	17.108.576
32	Off-balance sheet items								
33	<b>Total RSF</b>					<b>1.003.806.954</b>	<b>1.121.705.855</b>	<b>942.987.885</b>	<b>969.960.913</b>
34	<b>Net Stable Funding Ratio (%)</b>					<b>270,84%</b>	<b>289,23%</b>	<b>289,29%</b>	<b>283,16%</b>



### Leverage ratio:

RMD monitors the Leverage Ratio on a daily basis and reports the results to the General Management and the Board of Directors at the monthly Credit & ALM Committee and the quarterly Board of Directors' Meeting respectively.

LEVERAGE RATIO (LR) AS OF DECEMBER 2024	USD
A. Tier 1 Capital	645.801.472
B. Total Leverage Ratio Exposure	8.288.746.483
C. Leverage ratio (A) / (B)	7,79%
D. Minimum Requirement	3,00%
E. Minimum Requirement met	OK

Table 8: Leverage Ratio as of 31/12/2024

## 5. Operational Risk Monitoring

The Bank has defined Operational risk as the risk of loss resulting from inadequate or failed processes or systems, human factors or due to external events that are neither market nor credit-related. Operational risk is inherent in MIBL's activities and can manifest itself in various ways, including fraudulent acts, business interruptions, in appropriate behavior of employees, failure to comply with applicable laws and regulations or failure of vendors to perform in accordance with their arrangements. These events could result in financial losses, litigation and regulatory fines, as well as other damage to the bank. The goal is to keep operational risk at appropriate levels, in light of MIBL's financial strength, the characteristics of its businesses, the markets in which it operates, and the competitive and regulatory environment to which it is subject.

The Operational Risks of each business line are identified, measured, and controlled. When remedial or preventive measures are necessary to attenuate risks, the RMD in collaboration with General Management, conceives of and implements an action plan.

As part of group-wide management, the Bank collects, measures, and analyzes loss data, if any, which includes financial losses, derived from operational error events.

"Operational mishandling" refers to errors identified as being caused by negligence in processing and/or disrespect of the Bank's internal rules and procedures, or normal commercial customs and practices.

MIBL has developed a nomenclature while reviewing the Accident Management Procedure. Accidents are defined as:

- Accidents with Internal Responsibility (IR): Internal errors that could be avoided for example by controls in place, internal procedures, 4-eyes-check principles, and system automation. Examples of IR accidents are:
  - Fraud, sabotage/vandalism by employee
  - Non compliance with laws, regulatory requirements
  - Human Error in processing transactions
  - Control step missing
  - Disruptions or system failures
  - New services, products
  - Change to current processes
- Accidents with External Responsibility (ER): External errors that are less predictable and by nature out of control of the Bank. Controls on outsourcing contractors are however being reinforced. Examples of ER accidents are:
  - Fraud, Act of terrorism, sabotage
  - Erroneous provision of data

The Bank maintains a historical table on accidents that occur during the year.

The below-listed cases are taken into consideration:

- wrongful acts,
- cash accidents,
- operational errors,
- accidents in the course of business activities,
- system inconsistencies ("bugs") and disturbances ("shut-downs"),
- violations of relevant laws,
- complaints,
- lawsuits, and
- accidents not related to business activities.

MIBL uses these reports to recommend and implement improvements in collaboration with its parent company. The aim of the improvements is to prevent recurrence of analogous or related cases and to create awareness amongst the Staff of Operational Risk issues. All accidents are promptly reported upon discovery, and follow-up measures are carried out as appropriate.



The Bank's RMD applies two qualitative risk assessment tools: the Operational Risk Self Assessment (ORSA) and the Operational Risk Quality Assessment (ORQA) as preventive measures for reducing Operational Risk.

These measures combined with the Operational Risk reporting and statistics on incidents management allow a better management of the mitigation related to potential operational risks. The mitigation of operational risks is based as well on three lines of defence: the first line being under the responsibility of the business and operations units, the second with the RMD and the third with the Internal Audit.

As the Bank considers Operational Risk as one of the most important risks it is currently exposed to, stress tests are performed quarterly using the Operational Risk Loss Simulation (ORLS) model. The model is built on the experience gained from the accident reports and is designed to create severity classes in loss intervals and assigning likelihoods for the loss ranges (Insurance Mathematics). Based on this model, the Bank calculated a Pillar II requirement for Operational Risk (including outsourcing and safekeeping risks) of USD 22,300,529.

## **X. Equity Investments Held**

As of December 31, 2024, the Bank does not hold any participation recorded under "shares in affiliated undertakings".

## **XI. Regulatory Capital Requirements**

As required by E.U. Directive 2013/36/EU and E.U. Regulation 575/2013, the Bank maintains eligible own funds at least equal to the amount of its overall capital requirements. The minimum required ratio is 10.75%. The Capital Ratio amounted to 35.21% (the end of year profits were not added to the Bank own funds). The Bank applies the Simplified Standardized Approach for the Credit Risk and the Basic Indicator Approach for the Operational Risk.

This ratio is calculated and communicated to the CSSF on a quarterly basis.

All items included in the calculation of the credit risk are extracted from the accounting records of the bank.

The ratio (expressed in percentage terms) is calculated using the following formula:

- the numerator consists of eligible capital ("own funds") of the Bank,
- the denominator is composed of assets, risk-adjusted by means of percentage weightings that express the degree of credit risk and the capital requirement for Operational Risk.

The details of the capital adequacy ratio calculation as at December 31, 2024 are presented below:



		a	b	c	d	e
		31/12/2024	T-1	T-2	T-3	T-4
<b>Available own funds (amounts)</b>						
1	Common Equity Tier 1 (CET 1) capital	645.801.471,55				
2	Tier 1 (CET 1) capital	645.801.471,55				
3	Total capital	647.619.440,07				
<b>Risk-weighted exposure amounts</b>						
4	Total exposure amounts	1.839.183.019,89				
4a	Total exposure pre-floor					
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>						
5	Common Equity Tier 1 ratio (%)	35,11%				
5a	Not applicable					
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)					
6	Tier 1 ratio (%)	35,11%				
6a	Not applicable					
6b	Tier 1 ratio considering unfloored TREA (%)					
7	Total capital ratio (%)	35,21%				
7a	Not applicable					
7b	Total capital ratio considering unfloored TREA (%)					
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0,00%				
EU 7e	of which: to be made up of CET 1 capital (percentage points)	0,00%				
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	0,00%				
EU 7g	Total SREP own funds requirements (%)	8,00%				
<b>Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)</b>						
8	Capital conservation buffer (%)	2,50%				
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)					
9	Institution specific countercyclical capital buffer (%)	0,25%				
EU 9a	Systemic risk buffer (%)					
10	Global Systemically Important Institution buffer (%)					
EU 10a	Other Systemically Important Institution buffer (%)					
11	Combined buffer requirement (%)	2,75%				
EU 11a	Overall capital requirements (%)	10,75%				
12	CET 1 available after meeting the total SREP own funds requirements (%)	35,21%				
<b>Leverage ratio</b>						
13	Total exposure measure	8.288.746.483,26				
14	Leverage ratio (%)	7,79%				
<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)					
EU 14b	of which: to be made up of CET 1 capital (percentage points)					
EU 14c	Total SREP leverage ratio requirements (%)	3,00%				
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>						
EU 14d	Leverage ratio buffer requirement (%)	0,00%				
EU 14e	Overall leverage ratio requirement (%)	3,00%				
<b>Liquidity Coverage Ratio</b>						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	3.417.828.894,37				
EU 16a	Cash outflows - Total weighted value	4.287.857.900,33				
EU 16b	Cash inflows - Total weighted value	2.102.689.445,94				
16	Total net cash outflows (adjusted value)	2.185.168.454,38				
17	Liquidity coverage ratio (%)	156,41%				
<b>Net Stable Funding Ratio</b>						
18	Total available stable funding	2.718.737.134,14				
19	Total required stable funding	1.003.806.953,86				
20	NSFR ratio (%)	270,84%				

Table 9: EU KM1



	2024 USD
<b>A) Own Funds for solvency</b>	
	647.619.440
Paid up Capital instrument	<b>187.117.966</b>
of which Common Stock (Class A Shares)	185.299.997
of which Preferred Stock (Class B Shares)	1.817.969
Other reserves	<b>463.212.940</b>
Profit or loss attributable to owners of the parent	114.748.884
(-) Part of interim or year-end profit not eligible	-114.748.884
Previous year retained earnings	<b>645.382</b>
(-) Intangible assets	<b>-3.356.848</b>
(-) Amount deducted from Tier 1 Capital (Fair value of shares in affiliated undertaking recorded as Equity instruments under IFRS)	-
<b>Total Own Funds</b>	<b>647.619.440</b>
<b>Total prudential Own Funds</b>	<b>647.619.440</b>
<b>Total own funds for the Capital ratio</b>	<b>647.619.440</b>
of which Common Equity Tier 1	645.801.472
of which Tier 1 Own Funds	645.801.472
of which Tier 2 Own Funds	1.817.969

Table 10: Own Funds

	Pillar I
<b>2024 Capital Requirements</b>	<b>Regulatory Capital Requirements</b>
Credit Risk	163.116.062
Market Risk	0
Operational Risk	22.823.385
Climate & Environmental Risks	0
<b>Capital Requirement (<math>\Sigma</math>)</b>	<b>185.939.447</b>

Table 11: Pillar I regulatory capital requirements for each type of risk

## > Capital Requirements for Credit Risk

Capital requirements for Credit Risk are decomposed as follows:

Counterparty Breakdown	Exposure (USD) As of December 31, 2024	Capital Requirement (USD)	% of Total Capital Requirement
<b>Sovereign &amp; Central Bank</b>	3.487.571.047	0	0,00%
<b>Institution</b>	4.664.304.395	160.144.012	86,13%
<b>Corporate</b>	68.010.603	19.753.862	10,62%
<b>Others &amp; Equity</b>	53.998.594	6.041.573	3,25%
<b>Total</b>	8.273.884.638	185.939.447	100%

Table 12: Credit risk capital requirements decomposed for counterparty type

In accordance with E.U. Regulation 575/2013 of June 26, 2013, exposures to credit institutions for which a credit assessment by a nominated ECAI<sup>1</sup> is available shall be assigned that risk weight given by the nominated ECAI according to article 120 of the Regulation.

Exposures to institutions for which a credit assessment by a nominated ECAI is not available shall be risk-weighted in accordance with article 121 of the Regulation.

As an example, pursuant to article 120 of E.U. Regulation 575/2013, risk weights for exposures with a residual maturity of more than three months at institutions rated by a nominated ECAI are allotted risk weights according to the table below.

Credit Quality Step	Risk Weight
1	20%
2	50%
3	50%
4	100%
5	100%
6	150%

Table 13: risk weights assigned to exposures with a residual maturity of more than three months, according to their credit quality.



CEBS GL07 provides mapping from the Credit Quality Steps above to ECAI ratings. For example, for long-term credit assessments, for Moody's, CEBS GL07 indicates:

Credit Quality Step	Moody's Rating
1	Aaa to Aa3
2	A1 to A3
3	Baa1 to Baa3
4	Ba1 to Ba3
5	B1 to B3
6	Caa1 and below

Table 14: mapping between credit quality steps and Moody's ratings

#### > Capital Requirements for Operational Risk

The capital requirements for Operational Risk calculated in accordance with the Basic Indicator Approach are presented as follow.

B) Capital Requirement for Operational Risk	USD 2023	USD 2022	USD 2021
Net interest income	99.047.038,00	54.197.900,00	15.086.641,00
Net Fee & Commission income	84.432.993,00	85.228.211,00	72.212.597,00
Net foreign exchange trading result	6.871.015,00	14.187.009,00	3.876.551,00
Dividend	-	-	-
Realized gain on financial assets	-	-	-
Other operating income	7.288.612,00	8.565.557,00	5.473.576,55
<b>Total gross result</b>	<b>197.639.658,00</b>	<b>162.178.677,00</b>	<b>96.649.366,46</b>
Average over last 3 years			152.155.900
Capital Requirement (Basic Indicator Approach 15%)			22.823.385

C) Risk Exposure Amount	USD 2024
Risk Weighted exposure amount for Credit Risk	1.553.486.303
Risk Weighted exposure amount for Market Risk	-
Risk Weighted exposure amount for Operational Risk	285.292.313
<b>Total Risk Weighted Exposure Amount</b>	<b>1.838.778.616</b>

D) Solvency Ratio	USD 2024	
Own funds for Capital Ratio	647.619.440	
Total Risk Weighted Exposure Amount	1.839.183.020	<b>35,21%</b>

Table 15: capital requirements for Operational risk

During the financial year 2024, the Bank held regulatory capital well above the required minimum standards.





## Minimum Requirements of Own Funds and Eligible Liabilities (MREL)

As per the CSSF Resolution Board, since 2023 MIBL is binding to the Minimum Requirements of Own Funds and Eligible Liabilities (MREL) relative to Total Risk Exposure Amount (TREA) of 8% and MREL relative to Leverage Risk Exposure (LRE) of 3%. Since the implementation of said requirements, MIBL has kept both ratios above the regulatory levels. As of December 31, 2024 the results are 36.96% for MREL TREA and 9.88% for MREL LRE, both above the regulatory requirements.

## XII. Other Disclosure Requirements

### > Determination of Value Adjustments and Provisions

It is the Bank's policy to assess exposures on an individual basis and to establish specific value adjustments with respect to doubtful and irrecoverable debts. As at December 31, 2024 the Bank is not exposed to doubtful and irrecoverable debts and there is no need to establish specific value adjustments.

### > Credit Risk Exposure

Quantitative information on credit risk exposure by class and residual maturity and geographic location is given in the "Financial Instrument Disclosures" of the annual accounts, Notes 32.

Stress tests are computed quarterly as of 31st March, 30th of June 30th September and 31st of December of each year. The outcomes at 31st of December are calculated and reported to the Luxembourg regulator (CSSF) in the ICAAP/ILAAP<sup>2</sup> Report, based on the Bank's individual status as a credit institution established in Luxembourg, and not on a consolidated basis. The Bank is not subject to CSSF control on a consolidated basis.

As a result of the December 2024 stress tests, the worst-case scenario result was USD 8,690,133.-

### > Interest Rate Risk Exposure

The Bank's potential exposure on a Mark to Market basis for Interest Rate Risk is low. Due to the short term maturities of assets and liabilities, a change of interest rates would mainly impact the Bank's short-term future earnings (EaR).

The Bank has implemented a stress test on interest rates in order to comply with the provisions of the CSSF Circular 08/338 as amended by CSSF circular 20/762. The stress test aims at quantifying the variation of the value of an institution's wealth when interest rates change.

### Requirements to Calculate and Report the Stress Tests on Interest Rates

The interest rate scenarios applied are an increase and a decrease of 200 basis points on all interest rates to which the Bank is exposed. The transactions utilized in the stress scenarios include, but are not limited to, customer cash deposits and OTC derivative contracts written on the client's request. The Bank applies the interest rate shocks to the stated transactions taking into account the following parameters: residual maturity, contract rate, market rate, and nominal amount.

Stress tests are computed on a semiannual basis as of June 30th and December 31st of each year. The outcomes are calculated and reported to the Luxembourg regulator, the CSSF, based on the Bank's individual status as a credit institution established in Luxembourg, and not on a consolidated basis. The Bank is not subject to CSSF control on a consolidated basis.

The interest rate risk stress test consists on the parallel shift (increase or decrease) of interest rate by 200 bps and also on the six additional scenario defined by CSSF circular 20/762. The six additional scenarios have been defined within the guidelines as:

- Scenario 1: parallel shock up
- Scenario 2: parallel shock down
- Scenario 3: steepener shock (short rates down and long rates up)
- Scenario 4: flattener shock (short rates up and long rates down)
- Scenario 5: short rates shock up
- Scenario 6: short rates shock down

As a result of the December 2024 stress tests, the worst case (short rates shock) results on a potential loss of USD 29,258,388.

### > Internal Capital and Liquidity Adequacy Assessment

The Bank has created the risk surveillance and reporting framework described in sections V and VI of this disclosure. This framework has been created to permit the Bank to accurately evaluate its internal capital in terms of its current and future businesses.

<sup>2</sup> ICAAP/ILAAP – Internal Capital Adequacy Assessment Process / Internal Liquidity Adequacy Assessment Process



The Board of Directors, General management, the CRO, and the Risk Management Committee receive regular reports and updates on the Bank's risk profile, its numerical values, and capital needs in order to ensure:

- sufficient capital is held against the Bank's various risks, also under economic downturn scenarios
- qualitative judgment as well as quantitative measurements are used based on stress test scenarios and simulation models as part of the foundation of the Bank's capital estimation system, and
- prospective capital requirements based on the Bank's risk profile and strategic plans are adequately monitored and planned for.

#### > **Derivative Non-Trading Financial Instruments**

As at December 31, 2024, the analysis of OTC derivative non-trading financial instruments (the Bank has no proprietary trading portfolio) by class, residual maturity, and geographic location is given in the "Financial Instrument Disclosures" of the annual accounts, Notes 32.

#### > **The number of directorships held by members of the Management Body**

As of December 31, 2024, there is one person applicable in the Bank, Mr. Kosuke NAKAYAMADA, who is the Chief Executive Officer and the members of the Board of Directors in the Bank.

#### > **Remuneration policy**

The Bank's Remuneration Policy creates the framework for an effective mitigation of remuneration risks, as it will discourage actions and financial transactions that surpass the risk tolerance of the Bank. The Bank's remuneration policy is congruent with the objectives and values of the Bank. The policy is detailing how the Bank avoids variable (alternatively fixed) compensation packages that are not tied to the financial results of the Bank, nor tied to the performance of its employees. The Bank ensures that the fixed and variable components of total remuneration are appropriately balanced. The fixed component represents a sufficiently high proportion of the total remuneration and allows a flexible policy on the variable remuneration components.

The Bank reviews the Remuneration Policy at least once a year to ensure that the principles, objectives, and methods of the policy are followed as they have been adopted. The Bank's Remuneration Policy adheres to the principles laid down in E.U. Directive

2013/36/EU, the Commission Delegated Regulations no. 604/2014 of March 4, 2014 and no. 527/2014 of March 12, 2014. Remuneration policy is disclosed on our website (<https://www.mufig-investorservices.com/mibl/>). The updated version will be disclosed on our website in 2025 in compliance with applicable regulations. In addition to the elements noted above, the remuneration policy is providing at a minimum, details regarding the scope (institutions concerned by the policy), governance, and the ratio between fixed and variable compensation for the different employees.

Furthermore, in accordance with Circular 22/797, the Bank reports the number of persons with high remuneration packages following the compensation ranges defined in the Circular. For 2024 the Bank has reported 34 high rank employees with linked higher remuneration packages, outside the in force remuneration convention.

Quantitative information on Remuneration in 2024 will be disclosed separately soon on our website in accordance with regulatory requirements. The brief summary is as follows.

- Remuneration awarded for the financial year: EUR 26,506,560 in 2024
- Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff): Not Applicable
- Deferred remuneration: Not Applicable
- Remuneration of 1 million EUR or more per year: Not Applicable

#### > **Diversity Policy**

The Bank aims at promoting the diversity among the identified members of the staff exercising management functions by setting diversity policy and concrete objectives. (i.e : granting trainings, focusing on the gender neutrality during the recruitment process and career planning). The details on the policy, concrete objectives and progress will be provided in a separate report on our website. (<https://www.mufig-investorservices.com/mibl/>)

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