



# ABN AMRO Clearing Bank N.V.

## Annual Report 2024

## Notes to the reader

This is the Annual Report for the year 2024 of ABN AMRO Clearing Bank N.V. The Annual Report consists of the Management Board report, Supervisory Board report, the Annual Financial Statements and other information.

The financial information contained in this Annual Report has been prepared in accordance with International Reporting Standards (IFRS) as adopted by the European Union (EU) and the financial reporting requirements included in title 9, Book 2 of the Dutch Civil Code. Some chapters in the Risk management section of this Annual Report contain audited information and are part of the Annual Financial Statements. Audited information in these sections is labelled as 'audited' in the respective headings.

This Annual Report is presented in euros (EUR), which is ABN AMRO Clearing Bank's presentation currency, rounded to the nearest thousands.

Due to rounding, numbers presented throughout this document may not add up precisely to the totals provided. In addition, certain percentages in this report have been calculated using rounded figures.

For more information please visit us at [abnamroclearing.com](https://abnamroclearing.com)

# Contents

Introduction	4
At a glance	5
Message from the CEO	6
Governance	8
Supervisory Board	9
Management Board	12
Responsibility Statement	14
Corporate Governance	15
Our Business	19
Our Business	20
Platform & Product grids	22
Our Regions	23
Regulatory Environment and Compliance	24
Corporate Social Responsibility	28
Our People	32
Risk Management	35
Annual Financial Statements	51
Notes to the consolidated annual financial statements	57
Accounting policies	58
Company Financial Statements	101
Accounting principles for the company statement	105
Acquisitions	113
Rules on profit appropriation as set out in the Articles of Association	114
Profit appropriation	115
Other Information	116
Independent auditor's report	117
Address	125





# Introduction

At a glance

5

Message from the CEO

6



# At a glance

## Leading the Way to Safe and Transparent Markets

### Established

1982

### Trades processed\*

5.39  
billion

### Derivative contracts cleared

10.72  
billion

### Liquidity Centres

&gt;160

### Total FTEs

1,146\*\*



### The Value Chain



#### Execution

Trading member



#### Clearing

General clearing member



#### Settlement

Global custodian



#### Dutch Banking Licence

- Regulated by the
- Dutch Central Bank
  - European Central Bank
  - Authority for the Financial Markets



#### Client Segments

- Professional Trading Groups
- Corporate Clients
- Prime

### Governance

ABN AMRO Bank N.V.

↓ 100%

ABN AMRO Clearing Bank N.V.



- Top three ranking on transaction turnover and market share
- Self-supporting operating model
- No proprietary trading

#### Net profit

Underlying net profit  
(x EUR million)

2024 2023

284 231



#### Cost/Income ratio

2024 2023

48% 55%

#### Client satisfaction

on a scale  
from 1 to 7

5.9

#### NPS

on a scale from  
-100 to +100

+54

#### Employee engagement

83%

#### Trees planted to date



323,498

\* Number of client trades processed includes options, futures and securities. The number of trades excludes internal transactions between offices.

\*\* This is excluding approximately 170 external employees.

# Message from the CEO

I am proud to share our annual report over 2024 with you. Financially we have been able to set new highs, while we maintained our moderate risk profile and increased the speed of our IT transition. The latter is in line with our ambition to align our services across the globe to accommodate for the way our clients are transforming their way of doing business.

Geopolitical developments and continued heightened volatility on financial markets were the main drivers for high transaction volumes throughout the year. We have seen new peak levels in APAC triggered by geopolitical tensions and interest hikes in Japan. In both USA and Europe, multiple elections during the year kept all market participants active. Overall, our annual volumes in client transactions ended at 5.4 billion, versus 5.2 billion in 2023.

The number of IT disturbances declined further, and we mitigated any material client impact with the help of our vendors and staff. We executed on our strategic objectives by focusing on our IT transition under project name “1Global”, moving from a three-regional to a single global operating model. Significant progress has been the role out of one of our core clearing systems in the US with Fixed Income as the minimum viable product. The rest of the functionality is expected to be implemented around mid 2025. At the same time, we have been executing the DORA and Cyber Security Roadmap in a relevant program as planned.

Financially, we have raised the bar; revenues grew to EUR 769 million and net income to EUR 284 million, which resulted in a RoE of 11.5% and a Cost Income Ratio of 48%. A key driver of these results is the success of our clients in growing geographically, their product range and our ability to accommodate their business strategy. The interest rate environment remained high, which resulted in a strong revenue increase in 2024.







We are pleased with the recognition from our clients, as measured in the annual NPS score having received a score of 54 (41 in 2023). We are also very happy with the Employee Engagement Survey outcome of 83% versus an 80% outcome last year, based on increases in scores in almost all 15 subcategories.

In 2024, we continued to take responsibility, in line with our industry footprint, to live up to our purpose: Leading the way to Safe and Transparent Markets. We participated in many industry initiatives to create a better marketplace, together with our industry partners, by engaging in financial market policy debates around in the globe. Like in the past few years we keep pushing the envelope on operating in a more sustainable way; in terms of CO2 footprint and increasing the usage of renewable energy, especially of our datacenters.

By reading the above you can imagine I feel very proud of what we have achieved as an organisation over 2024. There is still a lot to do and improve on, but I feel we are well-positioned to deal with these challenges going forward. The trust and support of our clients, partners, shareholder and staff has been very important to get to these results and I am extremely thankful for it.

**Rutger Schellens**

**CEO of ABN AMRO Clearing Bank N.V.**

# Governance

Supervisory Board	9
Management Board	13
Responsibility Statement	15
Corporate Governance	16



# Supervisory Board

This section highlights the main activities of AACB's Supervisory Board for the year 2024.

The Supervisory Board provides guidance and oversight to the Management Board concerning the implementation of AACB's strategy and achieving its long-term goals. The Supervisory Board reviews and discusses the strategy with the Management Board and monitors its execution, balancing risks and rewards.

The composition of the Supervisory Board follows ABN AMRO Bank N.V.'s principles, including the importance of diverse perspectives, expertise, backgrounds, competencies, and interpersonal styles (including gender diversity) for effective supervision, risk management, and long-term value creation. AACB met the diversity policy gender target of 30% for the Supervisory Board in 2024. Additionally, the Supervisory Board included two external members in 2024 with a third external member appointed as of 1 January 2025, resulting in a total of six members.

The collective expertise of the Supervisory Board members spans clearing and custody, banking, risk management, strategy formulation and execution, capital and liquidity management, economics, sustainability, corporate and social responsibility, audit, legal and compliance matters. Furthermore, as of 1 January 2025, AACB has enhanced its IT and IT security expertise with the addition of the sixth member to the Supervisory Board.

## Supervisory Board Meetings

During 2024, the Supervisory Board convened regularly according to a predetermined schedule, holding fifteen meetings in total. Standard agenda items included AACB's financial performance, risk management action plans, strategy, compliance, market and regulatory developments, audit findings, human resources (including succession planning, talent management, risk culture plan, and diversity), regulatory issues, and IT security. Additionally, the meetings reviewed and approved AACB's risk appetite statement and the internal capital and liquidity adequacy assessment processes in relation to its strategy. The Management

Board consistently provided financial data to the Supervisory Board to reflect periodic results, risks, and capital and liquidity positions.

Beyond the standard agenda items, the focus in 2024 included monitoring the implementation of the new IT operating model, cyber and information security risk, effectiveness of risk governance, and addressing regulatory feedback on topics such as market risk and stress testing, governance, collateral management, and dividend upstreaming. Implementation of the DORA regulation within the EU and AACB's corresponding compliance was also a significant area of interest for the Supervisory Board. Furthermore, specific attention was given that the new Supervisory Board member would extend the overall fit of the suitability matrix combined with strengthening the suitability of technology knowledge in the Supervisory Board.

The Supervisory Board convened with the Management Board and senior management to discuss AACB's global strategy. Ahead of most meetings, the Supervisory Board dedicated time to discuss topics independently of the Management Board. All scheduled plenary sessions included the presence of the Management Board and the Company Secretary. Furthermore, senior management and subject-matter experts were routinely invited to present on AACB's business-related topics.

Organisational changes, including the addition of the subsidiary AAC IT Services Romania S.R.L. effective August 13, 2024, as well as initiatives and operational incidents were discussed with the Supervisory Board. Additionally, members visited several APAC branches and subsidiaries of AACB to engage with local clients, management, staff, and the local commodity exchanges.

The results of AACB's 2024 Client Survey and Employee Engagement Survey were noted. During an offsite meeting with the Management Board, the Supervisory Board reviewed AACB's strategy, the role

of the Supervisory Board, regulatory developments, sustainability, and data (strategy, threats, and opportunities). In its annual self-assessment, the Supervisory Board evaluated actions taken in previous years and formulated new actions for further deep dive.

The external auditors of AACB, Ernst & Young (EY), conducted audits on various topics and presented their findings to the Audit, Risk, and Compliance Committee (ARCC) of the Supervisory Board on 15 May 2024. Additionally, the auditors report on the 2024 Financial Statements was reviewed and noted by the Supervisory Board.

### Audit, Risk & Compliance Committee

Up to and including 31 December 2024, the Audit, Risk & Compliance Committee (ARCC) supported the Supervisory Board in fulfilling responsibilities related to internal risk control, capital management, and regulatory compliance to provide thorough advice. The ARCC was composed of Mrs. Bartje Schotman-Kruiten (Chair), Mr. Frank Graaf, and Mr. Eric Drok. Additionally, members of the Management Board, representatives from Finance, Compliance, Legal, Risk, Internal Audit, and the external auditor (EY) were invited to participate in ARCC meetings.

In 2024, the ARCC held six plenary meetings to discuss audit, legal, risk, and compliance topics as well as AACB's capital and liquidity positions. During these meetings, ARCC members examined issues related to stress testing, ICLAAP, the Legal Report, the Compliance Report, and the Risk Report along with internal audit opinions to gain more insight into pending issues and their resolution. The main findings are presented in the Supervisory Board meeting for further review or decision, such as on the annual Risk Appetite Statement.

The Management Board monitored progress on various projects throughout the year to maintain a moderate risk profile and prioritise client interests. The AACB's Risk Management Report, which was regularly presented at ARCC meetings, provided the foundation for effective discussions regarding key risks facing the AACB.

At the start of 2025, AACB restructured the ARCC into two separate committees: the Audit Committee (AC) and the Risk and Compliance Committee (RCC). Additionally, a new committee, the Remuneration and Nomination Committee (RemNomCo), was created. This restructuring was intended to address AACB's growth as an organization and the increasing need to discuss audit, compliance, risk, remuneration (including competitiveness in the international environment), and nomination topics in more detail. The following Supervisory Board members are members of the respective committees:

**AC:** Mr. Eric Drok (Chair), Mrs. Dies Donker, Mrs. Bartje Schotman-Kruiten and Mr. Marcel Prins.

**RCC:** Mrs. Bartje Schotman-Kruiten (Chair), Mr. Frank Graaf, Mr. Hans Hanegraaf and Mr. Marcel Prins.

**RemNomCo:** Mr. Hans Hanegraaf (Chair), Mrs. Dies Donker, Mr. Frank Graaf and Mr. Eric Drok.

### Permanent Education

Members of the Supervisory Board actively enhance their expertise by engaging in continuous education sessions and participating in ABN AMRO's lifelong learning programme. Measures have been implemented to organise, execute, and monitor this process effectively. The AACB's permanent education plan for 2024 particularly emphasised IT and Cyber Risk, and mastering culture and conduct was also a significant theme.

With AACB's revised governance structure and the segmentation of the ARCC into two distinct committees, the Supervisory Board (SB) underwent training sessions on the establishment of these new committees and their impact on organisational governance.

Additionally, the SB conducted an internal discussion on Sustainability and Operational Resilience, ensuring compliance with the EU's Digital Operational Resilience Act (DORA).

As part of its consolidation with ABN AMRO Bank N.V., AACB applies the Dutch Banking Code's principles. ABN AMRO Bank's Group Audit and the external auditor attend a Supervisory Board meeting at least annually.

Amsterdam, 16 May 2025

### Supervisory Board

Hans Hanegraaf  
Frank Graaf  
Bartje Schotman-Kruiten  
Dies Donker  
Eric Drok  
Marcel Prins





**Hans Hanegraaf (Dutch, male, 1965)**  
**Supervisory Board Member**

Hans Hanegraaf was appointed to the Supervisory Board of ABN AMRO Clearing Bank N.V. on 6 September 2021 and was subsequently appointed Chair with effect from September 2022. Currently, he is the Chief Executive Officer of Bethmann Bank in Frankfurt. Previously, Hans held various positions at ABN AMRO Singapore and ABN AMRO in the Netherlands.



**Bartje Schotman-Kruitén (Dutch, female, 1971)**  
**Supervisory Board Member**

Bartje Schotman-Kruitén was appointed to the Supervisory Board of ABN AMRO Clearing Bank N.V. on 17 December 2020. In the past, Bartje has held various positions within ING and ABN AMRO. In December 2019 Bartje returned to ABN AMRO to head the Information & Operational Risk Management team. On 9 April 2021, Bartje was appointed Chair of the Audit, Risk and Compliance Committee of ABN AMRO Clearing Bank N.V.



**Frank Graaf (Dutch, male, 1958)**  
**Supervisory Board Member**

Frank Graaf was appointed to the Supervisory Board of ABN AMRO Clearing Bank N.V. on 22 June 2020. He is a member of the Audit, Risk and Compliance Committee. Frank is Of Counsel at Clifford Chance, a global law firm where he has been a partner leading Clifford Chance's Capital Markets, Financial Regulation and Derivatives Group in Amsterdam for over 27 years.



**Eric Drok (Dutch, male, 1960)**  
**Supervisory Board Member**

Eric Drok was appointed to the Supervisory Board of ABN AMRO Clearing Bank N.V. on 6 September 2021. He is a member of the Audit, Risk and Compliance Committee. Eric is an experienced international Executive, Non-Executive board member and ex-bank CEO and has worked for financial institutions and investment firms in Europe, the USA, Australia and Africa. He currently serves as Chairman of the Supervisory board of Knab N.V. and Vice Chairman of the Supervisory board of CBA (Europe) Bank N.V.



**Dies Donker (Dutch, female, 1967)**  
**Supervisory Board Member**

Dies Donker was appointed to the Supervisory Board of ABN AMRO Clearing Bank N.V. on 6 September 2021. Currently, she holds the position of Global Head of Financial Institutions at ABN AMRO N.V. where she is responsible for determining and executing the strategy for financial clients globally. Prior to that, Dies served as the Managing Director of Investor Relations at ABN AMRO N.V. for fifteen years. Dies also worked at Fortis and UBS Investment Bank.



**Marcel Prins (Dutch, male, 1969)**  
**Supervisory Board Member**

Marcel Prins is the newest member of AACB's Supervisory Board, having joined on 1 January 2025. He is a member of the Audit, Risk and Compliance Committee. Marcel is also Chief Operating Officer and Management Board member at asset management firm Robeco. Past experience includes, amongst others, posts as Chief Operating Officer and Chief Digital Officer at APG and supervisory positions at Rabobank Re-insurer and Holland Fintech. Marcel Prins is especially interested and well versed in the IT domain.



# Management Board

AACB posted record high 2024 annual results with net profit ending at EUR 284 million.

Operating income for the year reached EUR 769 million, representing an increase of EUR 109 million or 17% compared to 2023. Both net interest income and net fee and commission income increased, respectively with EUR 42 million and EUR 40 million compared to prior year. Market circumstances proved to be attractive during 2024. Interest rates remained high in general while a rise was seen in client liquidity demands. Besides that, the increased global turnover on exchanges and trading venues helped elevating the level of earned fees. Various factors impacted cleared volumes such as ongoing geo-political unrest, international elections, monetary updates, economic stimulus announcements and increased popularity of short-term option series.

Also, non-recurring income, reported under both net trading income and other operating income, contributed positively to the improved topline results and total up to EUR 34 million for the year. This represents an increase compared to 2023 of EUR 27 million. This is almost entirely due to unrealised gains in investments and positive treasury related results reported in AACB's subsidiary in Brazil.

Operating expenses for the year was EUR 372 million, an increase of 2% from EUR 364 million reported in 2023. Personnel expenses totalled to EUR 185 million, a variance of EUR 24 million against prior year. This is largely due to the impact of global inflation on staff expenses in combination with investments in FTE growth to support AACB's strategic priorities.

General and administrative expenses decreased by EUR 20 million to a level of EUR 176 million. This is primarily due to Single Resolution Fund effects, since no contribution was required in 2024 as the target level of the fund was reached. As in 2023, AACB continued to make substantial investments throughout 2024 to further improve the stability, security, compliance and resilience of its business.

AACB further invested in fixed assets across the globe and furthermore, additional amortization effects are recorded related to internal information technology project costs.

Impairment charges on financial instruments came in at EUR 1.5 million for full year 2024. This is mostly composed by IFRS 9 driven, expected but unrealised, credit loss calculations. In 2024 only a minor amount of EUR 0.3 million was actually being recognized as unrealised loss from client defaults.

Income tax expenses increased to EUR 111 million, while in 2023 EUR 68 million was reported. This is partly the result from operating profit before taxation outperforming prior year results by EUR 96 million. The average effective reported tax rate is calculated at 28% for 2024 against 23% over 2023. This increase is primarily due to tax results reported in US, in entities transferred from ABN AMRO to AACB as per January 2024.

In 2024 AACB reported a cost/income ratio of 48% compared to 55% over 2023.



Management Board: Jan Bart de Boer, Lieve Vanbockrijck, Frederik ten Veen, Rutger Schellens

## Outlook 2025

Turnover on financial markets and trading venues is expected to be influenced by changes in the geopolitical landscape. Recent announcements by governmental bodies of major economies suggest that historical trade relations between regions change. Trade tariffs and significant increases in defence budgets can ultimately lead to reignition of inflation and upward effects on interest rates. This could fuel volatility in asset classes across the world. AACB is prepared to handle increased volumes.

For 2025, AACB will keep focusing on its strategic objectives. Further improvements to the global operating model, diversification and growth, risk and culture require allocation of resources but will be managed within the committed long-term profitability and cost/income ambitions.

# Responsibility Statement

Pursuant to section 5:25c sub 2 part c of the Dutch Financial Supervision Act, the members of the Management Board state that to the best of their knowledge:

- the Annual Financial Statements give a true and fair view of the assets, liabilities, financial position and profit or loss of ABN AMRO Clearing Bank N.V. and the companies included in the consolidation;
- the Management Board report gives a true and fair view of the state of affairs on the balance sheet date and the course of business during the 2024 financial year of ABN AMRO Clearing Bank N.V. and its affiliated companies, of which data is included in its Annual Financial Statements.
- the Management Board report describes the material risks with which ABN AMRO Clearing Bank N.V. is faced.

## Management Board

**Rutger Schellens,**

Chief Executive Officer and Chairman

**Jan Bart de Boer,**

Chief Commercial Officer and Vice-Chairman

**Lieve Vanbockrijck,**

Chief Financial Officer

**Frederik ten Veen,**

Chief Risk Officer

Amsterdam, 16 May 2025



# Corporate Governance

ABN AMRO Clearing Bank N.V. (AACB) is a public company with limited liability, incorporated under Dutch law on 25 November 1982, and is a wholly owned subsidiary of ABN AMRO Bank N.V. (ABN AMRO). AACB's financial statements are incorporated in the consolidated financial statements of ABN AMRO. ABN AMRO is listed on the Euronext Amsterdam exchange.

## Corporate structure

ABN AMRO has issued a 403 Statement with respect to AACB. Under Dutch law, a 403 Statement is a statement of a parent company in which it assumes joint and several liability for all liabilities arising from legal acts of the subsidiary to which the statement applies, in this case AACB. The 403 statement refers to Section 2:403 of the Dutch Civil Code and must be filed with the Trade Register of the Chamber of Commerce.

AACB has a two-tier board structure consisting of a Management Board and a Supervisory Board. The responsibilities and activities of the Management Board and the Supervisory Board are governed by Dutch corporate law and the AACB Articles of Association as well as other regulatory requirements. Furthermore, AACB has adopted rules of procedure for the Management Board, Supervisory Board and their respective subcommittees regarding their duties, powers and responsibilities.

## Management Board

### Responsibilities

The Management Board manages AACB, and its members are collectively responsible for the general course of AACB's business and its group companies, for ensuring compliance with laws and regulations, and for the adequate financing of its activities. The Management Board is also collectively responsible for the continuity of the AAC Group (including all subsidiaries and branches), developing a view on sustainable long-term value creation by AAC Group

and formulating a purpose, mission and strategy and specific objectives in line with this – while taking into account the impact the actions of AACB and the AAC Group have on people, clients and the financial markets we service and to that end weighing the multiple stakeholder interests that are relevant in this context. Furthermore, the Management Board is collectively responsible for defining, overseeing and being accountable for the implementation of governance arrangements that ensure effective and prudent management of the AACB and AAC Group, including the segregation of duties and the prevention of conflicts of interest.

The Management Board is supported in fulfilling its duties by the Global Management Team (GMT), which comprises the Management Board members, the Chief Information (Platform) Officer, the Chief Operations Officer, Chief Product Officer and the regional Chief Executive Officers (for Asia-Pacific, Europe, and the US).

The Management Board is accountable to the Supervisory Board and to the General Meeting of Shareholders (General Meeting) for AACB's performance in the entity. The Management Board provides the Supervisory Board with all information required to exercise its powers, including AACB operational and financial objectives, budget, annual accounts and risk, strategy and related parameters.

### Appointment, suspension and dismissal

Management Board members are appointed by AACB's General Meeting. In principle, appointments are for a period of four years. The Supervisory Board

and the General Meeting may suspend a member of the Management Board at any time. Management Board members can only be dismissed by the General Meeting.

An overview of the current composition of the Management Board is provided in the Management Board section.

## Remuneration

As a financial institution, AACB is subject to many guidelines and restrictions with respect to remuneration. Since 2015, limitations with respect to remuneration and particularly variable remuneration, apply to all employees in the Dutch financial sector, with even more restrictions applying to financial institutions supported by the Dutch State by way of shareholdings. While the Dutch State holds an interest in ABN AMRO, AACB will apply a prohibition on bonuses and individual salary increases for a specific group of senior employees. These restrictions also apply to AACB Management Board members.

ABN AMRO's Global Reward Policy provides a framework for managing reward and performance effectively and applies within ABN AMRO globally, at all levels and in all countries. The Global Reward Policy also specifies rules with respect to employees whose professional activities could have a material impact on ABN AMRO's risk profile. This group of employees is referred to as Identified Staff and includes the Global Management team, including Management Board members.

The remuneration packages for Identified Staff have been structured in accordance with financial-sector regulations and typically consist of the following components:

- Annual base salary
- Annual variable remuneration (with deferred payout)
- Benefits and other entitlements

Supervisory Board members who are employed by ABN AMRO do not receive separate compensation for AACB Supervisory Board membership. External members of the Supervisory Board do receive a compensation. In 2024, Frank Graaf and Eric Drok received a compensation as external members of the AACB Supervisory Board. Marcel Prins did not receive compensation for 2024 because his tenure as external member of AACB's Supervisory Board started in January 2025.

## Supervisory Board

### Responsibilities

The Supervisory Board supervises the policy of the Management Board as well as the general course of AACB's business. In addition, the Supervisory Board assists the Management Board by providing advice.

In performing their duties, Supervisory Board members are guided by the interests and continuity of AACB and its group business, taking into consideration the interests of all branches and entities of AACB and how strategies and policies contribute to the interest of



AACB, including all branches and subsidiaries over the long term. Specific powers are vested in the Supervisory Board, including approval of certain resolutions proposed by the Management Board.

The Supervisory Board meets at least four times per year and whenever any Supervisory Board member deems it necessary.

### Appointment, suspension, and dismissal

Supervisory Board members are appointed and may be suspended or dismissed by the General Meeting. An overview of the current composition of the Supervisory Board is provided in the Supervisory Board section.

### Changes in 2024

In 2024, there were no changes in the composition of the Management Board or the Supervisory Board. In 2024, Bartje Schotman and Frank Graaf were reappointed as members of the Supervisory Board. As of 1 January 2025, Marcel Prins was appointed as the sixth (third external) Supervisory Board member. Likewise, Supervisory Board members Eric Drok and Dies Donker are slated to be re-appointed in 2025.

### Diversity

The Management Board and the Supervisory Board consist exclusively of natural persons. The membership of the Management Board remained unchanged from the year prior and consisted of 25% female members at the end of 2024. This percentage changed however in 2025 for the Supervisory Board, with the addition of the sixth Supervisory Board Member, to a percentage of 33.3% female membership at the start of the new year. In the event of vacancies, AACB will give due consideration to any applicable diversity requirements in the search to find suitable new members who meet the requirements of the Dutch Financial Supervision Act.

### Dutch Banking Code

The Dutch Banking Code sets out principles that banks should adhere to in terms of corporate governance, risk management, audit and remuneration. The Dutch Banking Code applies to AACB as a licenced bank under the Dutch Financial Supervision Act. The principles of the Dutch Banking Code are fully applied by ABN AMRO to its subsidiaries on a consolidated basis by developing group-wide policies and standards to promote best practice provisions as well as compliance with internal and external rules.

AACB has implemented the relevant parts of the Dutch Banking Code. A principle-by-principle overview of the manner in which ABN AMRO and its subsidiaries comply with the Dutch Banking Code is available on [abnamro.com](https://abnamro.com).

### General Meeting

The General Meeting is entitled to adopt the annual accounts and take important decisions regarding

AACB. At least one General Meeting is held annually within six months from the end of the financial year. The agenda must include a minimum of following items: discussion of the Annual Report, adoption of the annual accounts, and granting of discharge to members of the Management Board and Supervisory Board. The General Meeting was held on 27 May 2024. The General Meeting adopted the 2023 annual accounts and granted discharge to members of the Management Board and Supervisory Board.

### Legal Structure

AACB is a wholly owned subsidiary of ABN AMRO and has been a fully licenced bank since 30 September 2003. Under the Single Supervisory Mechanism implemented in November 2014, AACB is subject to joint prudential supervision by the European Central Bank (ECB) and the Dutch Central Bank (DNB).

All shares in the capital of ABN AMRO are held by two foundations per 31 December 2024: Stichting Administratiekantoor Beheer Financiële Instellingen (NLFI) and Stichting Administratie Kantoor Continuïteit ABN AMRO Bank (STAK AAB). NLFI held 38.5% in ABN AMRO, of which 38% was directly held via ordinary shares and 0.5% was indirectly held via depositary receipts (DRs) for shares in ABN AMRO. STAK AAB was holding 62% of the shares in the issued capital of ABN AMRO. Only STAK AAB DRs have been issued with the cooperation of ABN AMRO and are traded on Euronext Amsterdam.

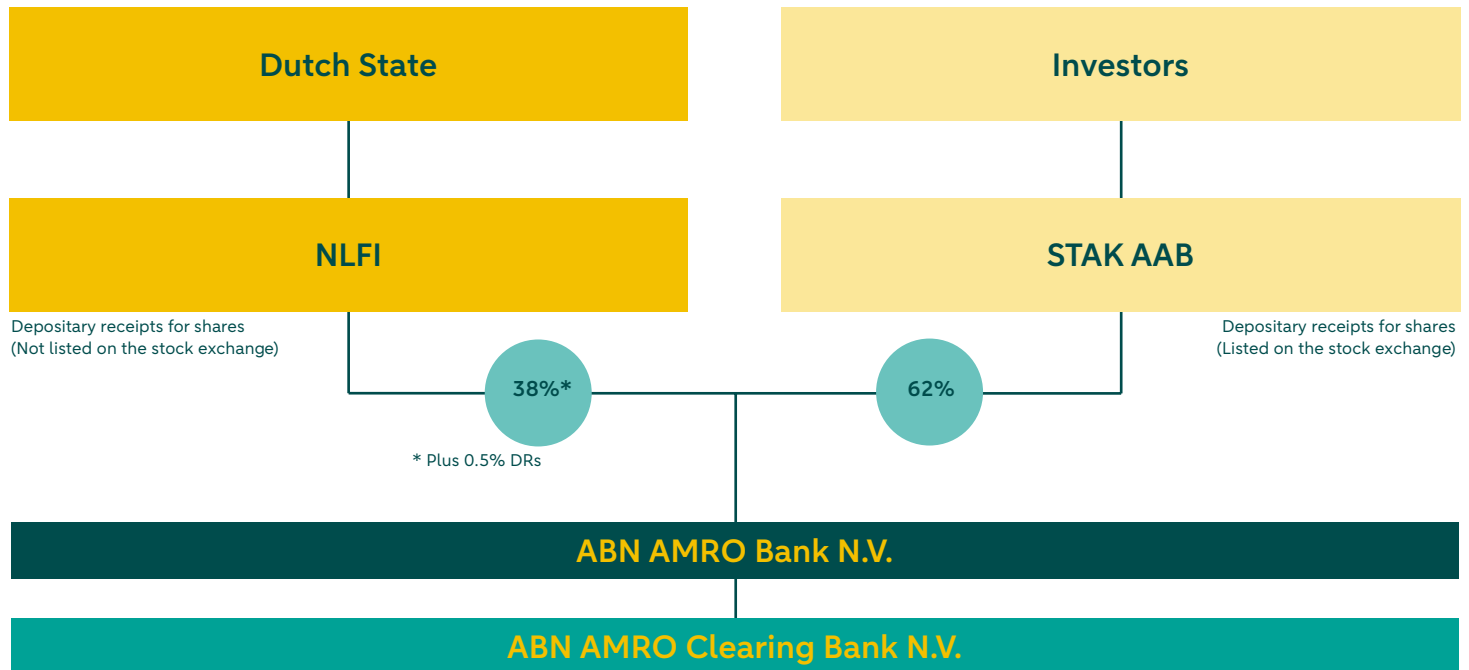
AACB continues providing global clearing and related services from its head office in Amsterdam. Beyond Europe, AACB provides services through its wholly owned (indirect) subsidiaries AAC-USA, Banco ABN AMRO S.A., ABN AMRO Corretora de Titulos e Valores Mobiliarios Ltda. (ABN AMRO Sao Paulo), ABN AMRO Clearing Sydney, ABN AMRO Clearing Tokyo, ABN AMRO Clearing Hong Kong, ABN AMRO Clearing Singapore and AACB Singapore Branch, as well as ABN AMRO Clearing Investments. On the 1st of January 2024 AACB received via a common control transaction with the entities ABN AMRO Holdings USA LLC and ABN AMRO Securities USA LLC from ABN AMRO. This following the decision of ABN AMRO to wind down their activities outside Europe. AACB also has an office in Frankfurt.

On 13 Augustus 2024, AACB established its newest subsidiary – AAC IT Services Romania S.R.L. This subsidiary serves as an IT-hub, no licensed services are provided from this entity.

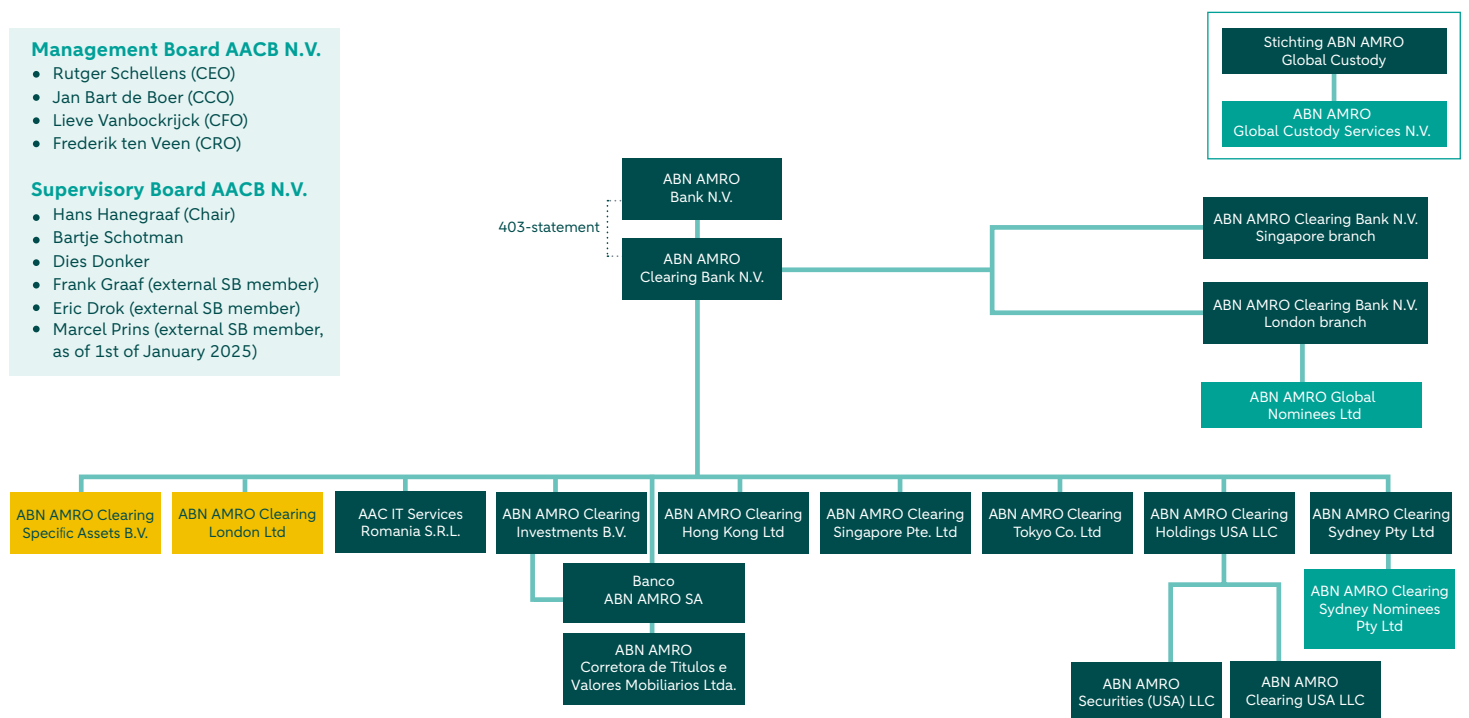
ABN AMRO Global Custody Services N.V. (AAGCS) is the safekeeping company of AACB that maintains AACB client securities (except for derivatives) and is planned to be decommissioned.



## Shareholder structure per 31/12/2024



## ABN AMRO Clearing Bank N.V group structure



Not active

Safekeeping companies

This chart shows 100% entities of ABN AMRO Clearing Bank N.V. within ABN AMRO Bank N.V.

# Our Business

Our Business	21
Platform & Product grids	23
Our Regions	24
Regulatory Environment and Compliance	28
Corporate Social Responsibility	32
Our People	36



# Our Business

ABN AMRO Clearing is a globally active multi-asset prime broker, custodian and general clearing member (GCM). We provide execution services, settlement, custody, securities lending, risk management, reporting and financing services for listed derivatives, cash securities, over the counter (OTC) products, exchange-traded funds (ETFs), commodities and foreign exchange transaction. We provide services from our offices across Europe, Asia-Pacific, Brazil and the United States. Our coverage includes all major exchanges and execution venues in these regions.

## Clients

### Principle trading groups

A principal trader is a company that acts as a market maker or liquidity provider on regulated markets and trades solely with its own capital. The purpose of their market intervention is to provide tradable orders to the market. They are the price makers on the exchanges, and they facilitate fair pricing between related instruments (securities, options, and futures).

We build our business in close collaboration with these Principle trading groups. They began trading on the floors of major exchanges. We all remember crowded pits filled with colorful jackets. The world has digitalized since. Since our inception in 1982 we have grown across the globe with this client group, following and supporting them in new products and new markets. This way we earned our global strong reputation as a reliable partner for principal trading groups (PTCs).

Today we service the leading global principal trading firms. Not forgetting most of our larger clients started small, it is in our DNA to help incubate well-structured start-up trading firms.

We continue to explore and provide access to new markets and products for this client group.

### Corporate Clients

We boast an equally long and strong track record in the execution and clearing of listed commodity derivatives for corporate clients. Our clients use listed derivatives to



hedge price risk of underlying commodity inventories; on (future) flows of agricultural base and precious metals, oil and energy-related products; and power and gas products. We have experienced physical delivery teams in Chicago and London and from these locations, as well as from our New York office, we offer (voice) broking services across various commodities markets. To support our clients' short term inventory financing needs, we created a cleared commodity repo product.

### Prime Clients

Within our Prime segment we position all our clients using the financial markets to, direct or indirectly, service their own (retail) clients and/or investors. We distinguish three different client groups all providing services across execution, clearing, settlement and

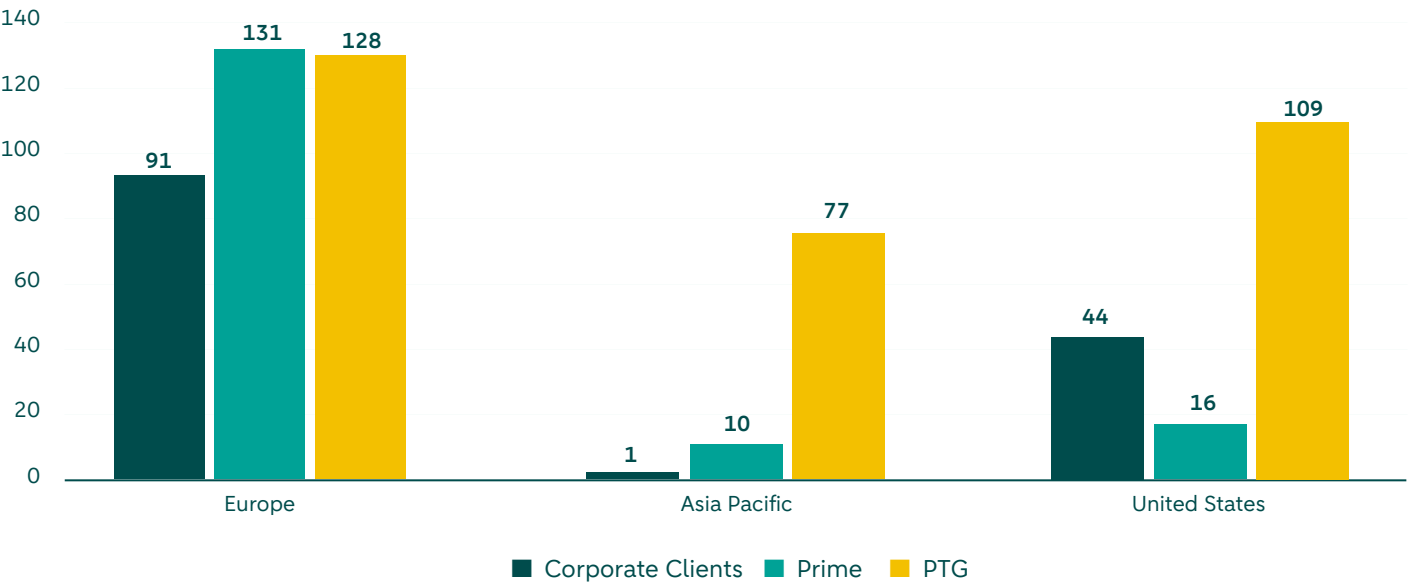


custody or a combination thereof.

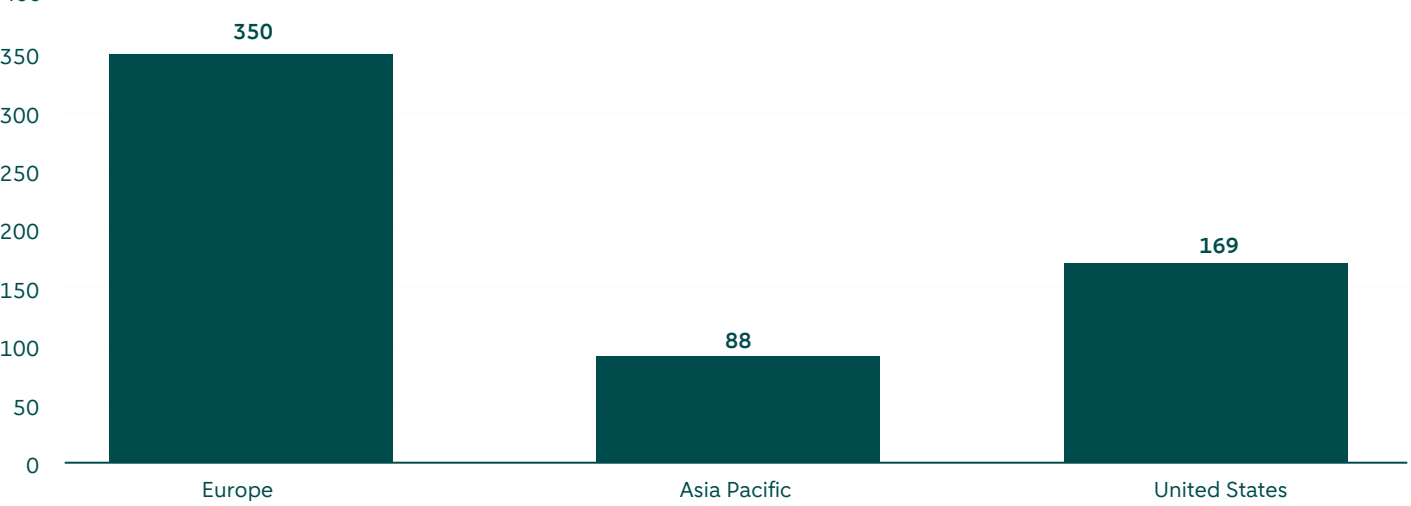
- European financial institutions use our complete suite of services; global custody and settlements, futures execution and clearing, OTC derivative clearing, SBL and repo services. Regional banks, insurance companies and pension funds increasingly seek a combination of interest rate swap and repo clearing and asset services (including collateral management) due to liquidity needs arising from CCP margin calls.
- Retail brokers across Europe use our global execution, clearing, settlement and custody services. When necessary, our offering is enhanced with stock loan and financing services. Ours is a ‘one-stop-shop’ solution, allowing retail brokers to focus on their core competences and clients.

- Alternative investment funds and hedge funds use our clearing and financing services as well as our Prime broker services, including the issuance of synthetic products. We focus on (hedge) funds having exposures to listed markets and deploying strategies where our correlation- risk models can well capture market risk.

Number of clients per Segment 2024



Number of clients per region 2024





## Platform & Product grids

In 2024 AACB made important steps in harmonising its IT landscape. The platform applications used by AACB are being standardised and made good progress especially on the two core systems in both the US and APAC, with the aim of steering the company towards a controlled, globalised, and harmonised future.

### Licence to operate

After the successful go-live of AACB's IT control framework, AACB has invested heavily in consumption of its IT control capabilities on a prioritised basis. Also, work has been performed to adapt the framework to enhanced regulatory frameworks such as the requirements under DORA. Given the ever-present cyber security threat and evolving regulatory frameworks for data and IT operations, AACB continued to invest in its cyber resilience. AACB placed emphasis on testing and fortifying its global security framework.

### New resource strategy

In 2024 AACB opened an IT services office in Iași, Romania. With setting up the Romanian office AACB intends to further increase the speed of IT development, improve the ratio of internal versus external IT Engineering employees and increase possibilities to attract the engineering expertise required.

AACB has sought to leverage its global presence by balancing its IT workforce capacity over the three regions. Next to benefits from a follow-the-sun efficiency setup, the balanced hirings resulted in more opportunities for business services. Investments have been made in certain expertise areas to futureproof the workforce in a changing environment and by expanding the workforce trainings. A generative Artificial Intelligence (AI) hackathon brought global business

and IT participants together to explore emerging technologies to ensure future business opportunities and innovation.

### Product & application strategy

AACB's product strategy is to seamlessly globalise and harmonise its services, products, and applications, while ensuring consistency and efficiency when delivering services to clients. By leveraging a global platform, AACB aims to streamline operations, enhance cross-functional collaboration, and provide a unified customer experience worldwide. The core focus areas include implementing global core processing systems, standardising external interfaces and trade processors, enhancing client interfacing, and driving a comprehensive risk modernisation program and investment.

### Fit for purpose platform

Investing in AACB's renewed IT platform is crucial for sustaining the security, performance, and reliability of the technological infrastructure. In 2024 AACB further built out its on-premises Openshift. Both platform setups ensure a standardised way of working that further enhances security, operational efficiency and resilience.

Life cycle management continued successfully keeping the platforms up to date and secure.

# Our Regions



## US

### Number of FTEs\*

Chicago: 224  
New York: 18



### Client satisfaction

on a scale from 1 to 7

6.37

### NPS

+63

### Employee engagement (%)

82

### Trades processed\*\*

3.89  
billion

### Derivatives Contracts cleared

6.72  
billion

## Europe

### Number of FTEs\*

Amsterdam: 540  
Frankfurt: 11  
London: 99  
Sao Paulo: 29  
Iași: 9



### Client satisfaction

on a scale from 1 to 7

6.11

### NPS

+55

### Employee engagement (%)

85

### Trades processed\*\*

745  
million

### Derivatives Contracts cleared

2.76  
billion

## Asia-Pacific

### Number of FTEs\*

Hong Kong: 37  
Singapore: 88  
Sydney: 75  
Tokyo: 34



### Client satisfaction

on a scale from 1 to 7

5.76

### NPS

+18

### Employee engagement (%)

84

### Trades processed\*\*

758  
million

### Derivatives Contracts cleared

1.23  
billion

\* This figure is excluding external employees

\*\* Number of client trades processed includes options, futures and securities. The number of trades excludes internal transactions between offices.



# Regulatory Environment and Compliance

Throughout 2024, significant developments shaped the regulatory landscape of financial markets. Regulators focused on key themes, such as sustainable finance, operational and digital resilience, reporting and Anti Money Laundering.

Although European and Dutch legislation largely govern AACB's activities, AACB is affected by many regulations globally. Increasing regional or national competitiveness is becoming more important and rising global tensions are further fragmenting the financial regulatory landscape. AACB engaged with policy makers as well as industry bodies to determine and influence the impact of regulations on financial markets, in the interest of our purpose, leading the way to safe and transparent markets. This chapter provides a global overview of the key regulatory topics that AACB encountered in 2024 and its approach to compliance.

## Sustainable Finance

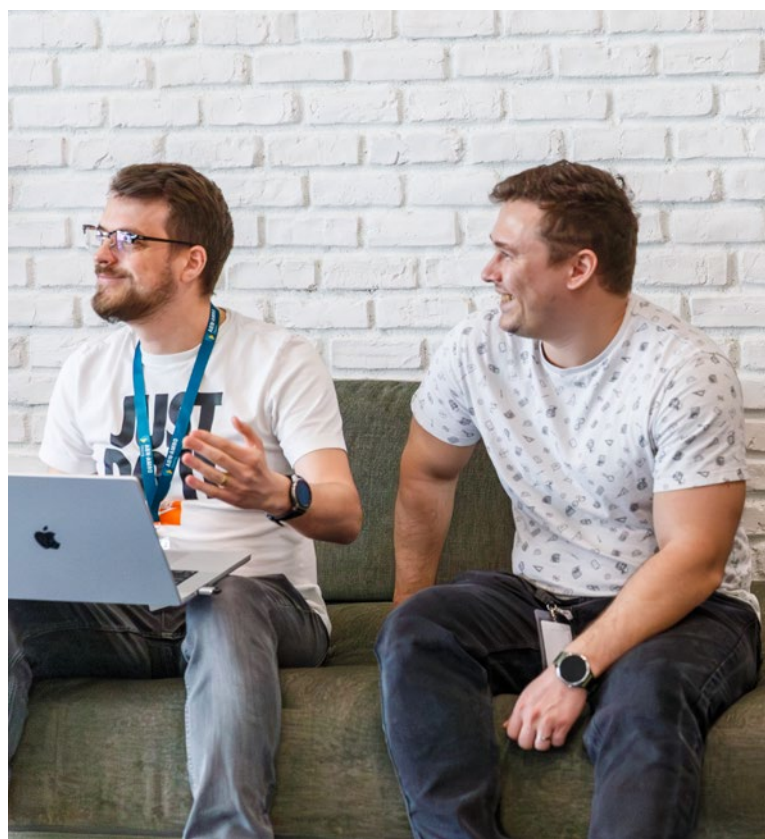
Sustainable finance regulations are introduced worldwide to improve transparency in the market for sustainable investment products, prevent greenwashing and increase transparency around sustainability claims made by financial market participants. A key priority regarding sustainable finance regulations for AACB [globally] in 2024 was the implementation of the expectations as set in the European Central Bank's guide on climate-related and environmental risks. The thirteen expectations cover the business model & strategy, governance & risk appetite, risk management and disclosures and is one of the supervisory priorities for the ECB in 2024-2026.

In Australia, the first mandatory climate related financial disclosure law requiring organisations to report in their annual financial statements was introduced in September 2024. AAC Sydney will be subject to reporting obligations starting January 2027.

Meanwhile, AACB focused on building sound governance around sustainable finance regulations for the benefit of its business and clients.

## Digital Operational Resilience and cybersecurity

The EU's Digital Operational Resilience Act (DORA) entered into force on 16 January 2023 and aims to strengthen the IT resilience of financial entities during severe operational disruption. Implementation efforts started in 2023 and continued in 2024, with ESMA releasing additional details in the Regulatory Technical Standards during the year. The scope of DORA has been broadly discussed by industry bodies and their





members leading to further clarification of the definition of ICT service provider.

The US Commodity Futures Trading Commission (CFTC) focused on operational efficiency with its Operational Resilience Framework (ORF) rulemaking – a set of guidelines and regulations designed to ensure that markets and market participants are prepared to maintain continuity and stability during disruptions. Unlike DORA in the EU that places a strong emphasis on digital resilience, the ORF focusses on market structure resilience, ensuring that trading and clearing systems remain functional in the face of operational disruptions and financial crisis. The CFTC will likely finalise the ORF proposal in 2025, with potential modifications to better align with international standards and US prudential regulations. AAC USA will continue to closely monitor these developments and implement where relevant.

The first cybersecurity legislation in Australia was passed in November 2024. The Act mandates organisations such as AAC Sydney, to report ransomware paid-related incidents within 72 hours to the Australian cyber regulator. In addition, a new Cyber Incident Review Board, an independent statutory body with powers to conduct no-fault, post-incident reviews of significant cybersecurity incidents in Australia, is established under the Act.

The Financial Services Agency (FSA) in Japan, announced the “Guidelines on Cybersecurity in the

Financial Sector”, as guidance to enhance cybersecurity in the financial sector. Involved departments are currently assessing the impact of these guidelines on AACB.

## Transaction Reporting

AACB must comply with transaction reporting requirements in various jurisdictions. AACB aims to ensure the adequacy, accuracy, and timeliness of transaction reporting.

The amended transaction reporting regime under the European Markets Infrastructure Regulation (EMIR) REFIT, introduced in 2019, came into effect in April 2024. The changes focused on standardised reporting and included an increased number of reporting fields. AACB formed a task force to address the challenges given the new requirements and standards set by EMIR REFIT.

The implementation of the updated Manual de Layouts by the BSM – Supervisao de Mercados (B3 Market Supervision) in Brazil introduced continuous monitoring frameworks requiring regular submission of information by market participants, such as ABN AMRO Clearing Brazil and ABN AMRO Broker Dealer. AAC Brazil has adapted its processes to meet the new reporting requirements. This includes ensuring accurate and timely data submissions in the specified formats, as well as maintaining ongoing communication with BSM to address any compliance issues.



In October 2024, the Monetary Authority Singapore (MAS) commenced the revised OTC derivatives reporting regime requirement. The additional reporting fields require a review on existing data sources and modification on prior reporting processes. AACB has since completed implementing this set of regulations.

### T+1/Settlements

The US Securities and Exchange Commission's (SEC) key focus was on transitioning from T+2 (transaction day plus two) to T+1 (transaction day plus one) settlement which was fully implemented in May 2024. Resources across multiple functions and departments have ensured compliance with the shortened settlement cycle. In addition to the internal working group AAC-US also engaged with the industry on defining new standards and actively participated in pre-implementation testing efforts.

The EU, Switzerland and the UK are planning to align with the T+1 settlement cycle by October 2027. The settlement situation in the EU is vastly different from the US (the EU post trade infrastructure is far more scattered). AACB has set up a T+1 taskforce and will contribute to industry groups and discussions to prepare for implementation. Complimentary, consultations on the Central Securities Depository Regulation (CSDR) are announced to facilitate the transition from T+2 to T+1.

### Anti Money Laundering (AML)

The EU enhanced its AML framework through the adoption of the sixth AML Directive and the AML Regulation. The legislative package aims at harmonising rules across Member States, oversight and addressing emerging financial threats. The Anti-Money Laundering Authority was established and is expected to be operational by mid-2025.

The Financial Conduct Authority (FCA) in the UK intensified its focus on AML and sanctions compliance. The FCA's three-year strategy includes numerous enforcement actions against organisations with control failings, demonstrating its commitment to combating financial crime. AACB has undertaken internal thematic assessments and improved the quality of existing data and processes to ensure that AACB remains resilient and compliant. Additionally, guidance was issued for the upcoming "failure to prevent fraud" offence, set to take effect on 1 September 2025. This new legislation holds organisations criminally liable for fraud committed by their employees or associates. It aims to foster a proactive, zero-tolerance approach to fraud by encouraging businesses to implement stronger internal controls. AACB is actively preparing for these changes by enhancing its fraud prevention framework.

The Securities and Futures Committee of Hong Kong has conducted the third Hong Kong Money Laundering and Terrorist Financing (ML/TF) Risk Assessment in respect of securities and virtual asset sectors in Hong Kong.

Other regulatory developments also demanded the attention over the course of the year. Below is an overview of the developments per jurisdiction:

### Europe

EMIR 3.0 was published in the Official Journal of the European Union on 4 December 2024 and entered into force on 24 December 2024. AACB is in scope of the operational requirements of the Active Account Requirement, as well as certain reporting and transparency obligations, informing clients how CCP-margin models work and the possibilities of clearing in the EU. AACB has expressed its concern to the supervisory authorities about the misalignment in implementation timelines, noting that level I must be implemented while the detailed level II provisions are not yet finalised.

The Capital Requirements Regulation 3 (CRR3) entered into force on 9 July 2024 and applies as of 1 January 2025. AACB has been working towards the implementation of the CRR3 requirements with most impact in the credit risk area. Further regulatory guidance and technical standards from the European Banking Association (EBA) are expected throughout 2025. Furthermore, the Capital Requirements Directive 6 (CRD6) requirements must be transposed into national legislation and will apply from January 2026.

### Australia

Amendments to the Australia Privacy legislation were passed in November 2024. The amendments include enhancement to data protection controls requiring AAC Sydney to review current controls within ABN AMRO Clearing and ABN AMRO to ensure adequate controls are in place.





## Brazil

The Central Bank's continuous monitoring frameworks requires AACB to uphold rigorous internal controls and reporting mechanisms to meet regulatory expectations. Both BSM and the Central Bank's continuous monitoring initiatives underscore the importance of robust compliance functions within financial institutions to ensure adherence to evolving regulatory standards in Brazil.

## Singapore

The MAS issued the Notice on Management of Outsourced Relevant Service and its Guidelines on Outsourcing for all banks operating in Singapore. The amended requirements came into effect in December 2024. Key changes include re-definitions, and higher requirements on outsourced relevant services that are deemed "material" and "ongoing" and which include the disclosure of customer information. A new template of the outsourcing register needs to be submitted on a half-yearly basis. The Singapore Outsourcing Clearing Committee (SOCC) has been actively reviewing the regulations to meet implementation timelines. The first submission based on the revised outsourcing register has been completed.

## Hong Kong

The Securities and Futures Committee (SFC) of Hong Kong announced new risk management guidelines for licenced futures brokers to take effect on 25 February 2024. A wide range of topics are covered, including market risk management, commodity futures trading, client credit risk management, concessionary margining, risk management over executing or clearing agents, funding liquidity risk management, safeguarding client assets, trading in futures markets outside Hong Kong and stress testing gap analyses.

## Japan

Changes to the "Act on Investment Trusts and Investment Corporations" (APPI) and Relevant Guidelines became effective on 1 April 2024. The changes relate to expansion of the scope of "Personal Data", subject to security measures and data breach notifications (caused with fraudulent purposes only). Personal Data is one of the Compliance Desk Review (CDR) subjects and the impact of the changes on existing practices and policies will be reviewed.

## United Kingdom

The UK's regulatory landscape experienced significant transformations, reflecting a post-Brexit shift towards a bespoke UK framework that prioritises consumer protection and market integrity. Central to this overhaul is the Financial Services and Markets Act 2023 (FSMA), which replaces retained EU legislation with UK-specific regulations. AACB remains vigilant and responsive to the dynamic UK regulatory environment, continuously striving to align our operations with new standards and expectations.

## United States

Both the SEC and the CFTC were increasingly involved in defining emerging technologies and regulating cryptocurrencies and other digital assets, as well as tightening oversight of financial markets and its participant to promote transparency and reduce market manipulation. This included continuing enforcement efforts in the off-channel communication space with both agencies levying significant fines on organisations of all sizes and business models to promote market integrity as digital communication tools grow and evolve.

## Compliance

Continuous collaboration between the global AACB compliance teams resulted in providing local assistance and global alignment on specific topics and cases. Compliance training efforts focused on meeting AML and MiFID II Knowledge & Competence educational requirements.

Some key highlights include:

### Sanctions

The topic of sanctions continues to be highly relevant and rapidly evolving because of various international conflicts. AACB continues to monitor developments and make necessary adjustments to its operations, systems, and infrastructure to respond to new sanctions, cyber threats and exposure to particularly higher risk markets and clients.

### Privacy

A Privacy Program was launched resulting in ongoing collaboration between ABN AMRO Bank N.V., the regions, and subsidiaries to improve alignment and mitigation of privacy risks in areas with the most exposure.

# Corporate Social Responsibility

AACB has a long-standing commitment to sustainability, with an overarching goal to accelerate the sustainability shift. This ambition is deeply rooted in AACB's purpose of leading the way to safe and transparent markets. AACB embeds sustainability into its business, benefiting our employees, clients, and society at large.

## Reducing our footprint

In 2024, AACB established a Climate Strategy to guide its efforts in reaching net zero emissions for its own operations. The strategy addresses the environmental impact of business operations, sets targets to reduce its footprint, and includes initiatives for employee, client, and industry engagement to enhance current sustainability practices.

AACB has partnered with the Amsterdam-based nature restoration organisation - Land Life Company since 2019. AACB supports the planting of trees in designated degraded areas and directly engages employees working in Amsterdam, Chicago, Sydney, and London

through local planting events. Through this partnership, AACB has future access to a limited supply of carbon credits, full transparency across the carbon credit value chain, and nature-based carbon removals certified by the global registries at a fixed cost. These carbon credits will be used to compensate for employee business travel and other scope 2 and 3 emissions. By the end of 2024, Land Life Company planted 100,409 trees, restored 126.75 hectares of land and captured 22.652 tCO<sub>2</sub> (see figure 2). AACB targets to be carbon neutral from 2030 onwards, through the shift towards renewable energy and the continuation of the Climate Impact and Reforestation Programme.

### Impact numbers (rounded)



Trees

1,900 41,796 26,708 66,657 86,028 100,409

323,498 trees



CO<sub>2</sub> captured over time

371 10,254 7,755 12,431 23,363 22,652

76,826 tCO<sub>2</sub>



Restored land

3.16 46.28 32.7 102.55 121.47 126.75

432.91 ha

● 2019 ● 2020 ● 2021 ● 2022 ● 2023 ● 2024

● Total

Note that the 2022 Co<sub>2</sub> capture figure slightly deviates from the annual report of 2023, which has to do with project developments. This will be compensated in 2025.

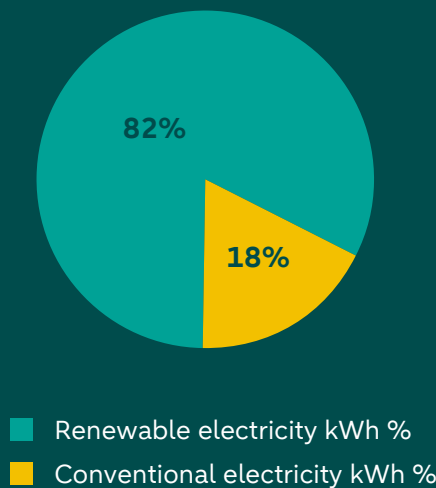
## IT and sustainability

Given the significant role IT plays in AACB's operations, AACB developed an IT Sustainability Framework. This includes an assessment of the IT value chain, identifying data centres and hardware as key sustainability impact points. The framework serves as a practical guideline and introduces actionable strategies, intermediate and long-term Key Performance Indicators (KPIs), to directly measure and actively manage the environmental footprint of IT operations.

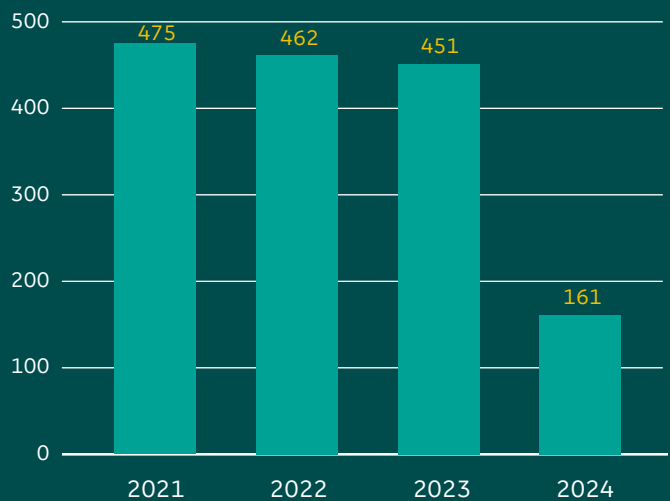
AACB strives to continuously improve the energy efficiency of its data centres and to support the adoption of renewable electricity, thereby reducing its overall environmental impact. In 2024, AACB made positive progress in reducing its total data center emissions. The reduction in CO<sub>2</sub> emissions of our data centers is due to newer hardware and a more efficient IT infrastructure to reduce energy consumption. The datacenters provided proof of renewable energy sourcing for 2024 by issuing Renewable Energy

### 2024 Data Center Renewable vs Conventional

kWh

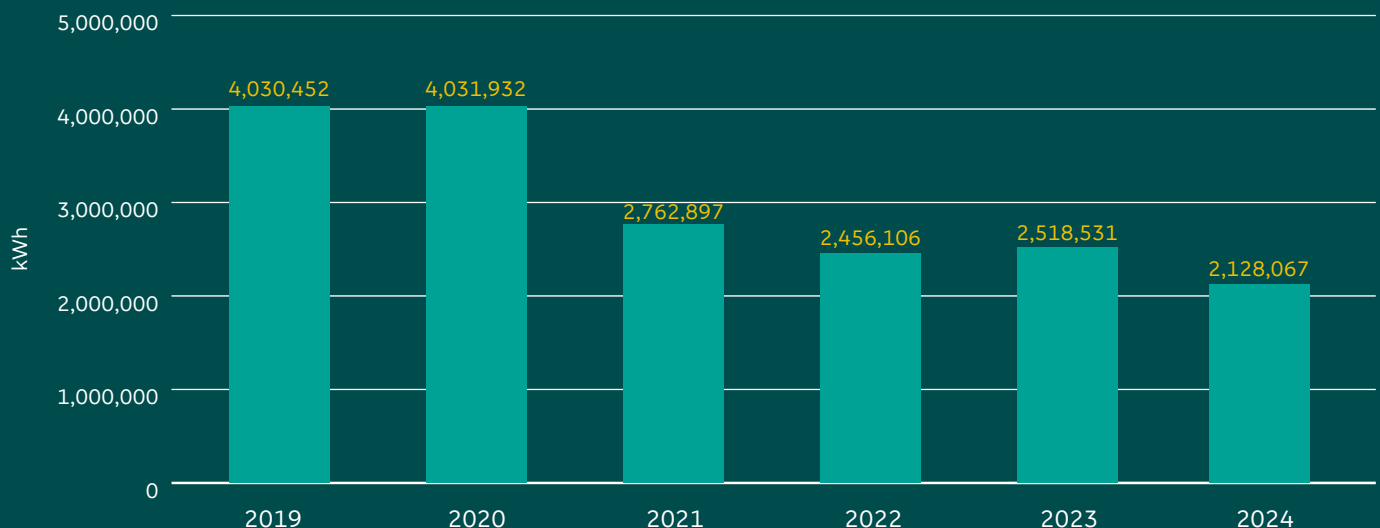


### Data center CO<sub>2</sub> emissions (Metric tons)



### Data center electricity consumption

kWh



Disclaimer: AACB continuously strives to improve its data and the sustainability reporting methodology, which results in anomalies with its previous annual reports. This year, AACB has significantly improved its sustainability reporting methodology, closer aligning with the GhG Protocol and applying more accurate emission factors.



Certificates, so we can now formally claim that the CO<sub>2</sub> emissions have reduced. In addition, this year AACB reduced the total data center electricity consumption and increased the share of data center electricity procured from renewable sources.

In 2024, AACB carried out an assessment of renewable energy procurement by its data centre vendors and is further exploring purchasing Energy Attribute Certificates (EACs). AACB aims to procure 100% renewable electricity for its data centres by 2030.

AACB has started collecting sustainability data on its hardware devices, establishing a data foundation and initial processes for hardware lifecycle management. In 2023, AACB entered an external partnership to recycle and remarket office supplies and devices globally. Through this partnership, AACB further reduces its environmental footprint and minimises e-waste.

### Employee participation

At AACB, employees are encouraged to learn more about sustainability topics from a personal and professional perspective. AACB provides mandatory training and sustainability presentations across the different regions.



Once a year, AACB organises a Sustainability Week with an educational and informational component, inviting key players and addressing topics relevant to the financial industry.

By involving employees in sustainability initiatives, AACB wants to shape the culture, experience, and expertise across the organisation. Each region encourages its employees to support community and charitable initiatives. To support these efforts, AACB sponsors various volunteering activities. Some of the successful regional initiatives in 2024 included the following:

- A learning programme developed by the Brazilian ESG Commission in partnership with ESPRO - Ensino Social Profissionalizante and the NGO Muretinhas, with the objective to contribute to the development of young adults in a vulnerable situation and prepare them for joining the job market through professional training.
- AACB UK provided funding and partnered together with Go Dharmic and volunteered to distribute food to the homeless as part of their Feed Everyone campaign.
- Volunteers in the Sydney office planted 1400 native trees and shrubs to provide shelter and nectar for small birds, reptiles and insects. Increasing canopy cover across Greater Sydney which will reduce urban heat in the future.
- AACB Amsterdam organised a charity padel event and raised funds for the IMC Weekendschool, an organisation that focuses on equal opportunities in education for children.
- Letters to Santa: a holiday gift programme in which students from Spencer Tech school, write letters to Santa Claus with their wish list. AACB's Chicago office (AAC-USA) employees volunteer to fulfil the gift requests and delivers them to the school.
- For many years, ABN AMRO Clearing Frankfurt has been supporting the Johann-Hinrich-Wichern School, a special school in the north of Frankfurt that is attended by pupils who are entitled to special educational support.

### Industry and client engagement

As a global leader in the clearing industry, AACB is uniquely positioned to identify emerging sustainability trends and collaborate with key stakeholders – including regulators, exchanges, central counterparties (CCPs), and clients – to drive meaningful change. By integrating sustainability into its operations and fostering dialogue, consultation, and innovation, AACB aims to accelerate the transition towards sustainable markets.

AACB actively participates in the industry on sustainability topics with a.o. discussions with clients on regulatory expectations, providing input on UN SSE consultations for voluntary guidance to the

financial markets and participation in the International Organization of Securities Commissions (CPMI-IOSCO) workshops on climate risks.

In response to the energy transition, AACB has been developing its power, energy, and carbon-offering to help key actors, including utility companies, proprietary trading firms, corporate institutions and energy trading start-ups realise their trading, hedging and growth strategies.

AACB partners with Frontclear, a company that focuses on developing stable and inclusive money markets in emerging and developing countries. AACB provides consultancy in kind to help address barriers to market development. In 2024, this amounted to 481 hours. AACBs involvement varies per country and can range

from risk management to infrastructure to governance advice. Last year, AACB and Frontclear finished research on the development of the financial markets in Zambia, which resulted in a follow-up project: a comparison on the development of the financial markets in Georgia, Ghana, Nigeria, Uganda and Zambia. The development model of Frontclear was used for this project, which describes the development of financial markets in a country. AACB supported Frontclear in defining the parameters for this model, comparing the different countries and creating advice on the next steps that countries can take to continue the development of their financial markets.







## Our People

2024 marked a year in which the AACB organisation grew both in business as well as the number of employees globally. Within the different locations events are organised focused both on fun as well as content driven matters, for example Lunch & Learns, Next Generation Clearing activities and other social activities.

### Employee engagement

The annual Employee Engagement Survey (EES) gathered global employee impressions for 15 focus areas such as inclusive environment, performance management, talent and development, leadership, vision and direction, among others. In 2024, 1048 colleagues worldwide completed the survey (a response rate of 86%), resulting in an 83 overall engagement score, which is a 2-point increase compared to 2023. Almost all areas scored slightly above or equal to 2023, only one area scored slightly lower (sustainability scored one point lower compared to last year). The survey responses will help AACB to improve employee engagement, ultimately enhancing the added value for clients. Managers are therefore encouraged to discuss survey results with their teams and incorporate staff feedback in future planning.

### Global Clearing Culture Programme

AACB has increased its investment in culture by introducing the Global Clearing Culture Programme, managed by a small team and supported by all HR teams globally. In 2024, over 15 Engagement Circles

were organised, with 90 employees from around the world participating. During the Leadership Team Days in September 2024, the focus was on the outcomes of the circles, reflections and the way forward. The programme is a follow up on the outcome of the Employee Engagement Survey and the Work Climate Survey 2024. This, along with the formulated Leadership Commitments should all be supportive to and boost the (risk) culture and (leadership) behaviour of AACB globally. As part of the programme a risk awareness campaign was launched in 2024, promoting sound risk taking and ownership. The desired (risk) culture (change) is communicated to all staff, through all-staff calls, CEO monthly messages, AACB intranet articles and it has been discussed during Management Board, Global Management Team, Supervisory Board, Leadership Team meetings and with the Dutch Works Council.

In 2025, new Engagement Circles will be organised on three topics in line with the focus points and based on the outcomes of the Employee Engagement Survey and the Work Climate Survey:



## Facts & figures

The Employee Engagement Survey (EES) canvasses the views of all our employees worldwide.  
How engaged did you feel in 2024?  
How did you rate working for ABN AMRO Clearing?  
Have a look at the key results and the main differences with last year.

### Our level of engagement in 2024

# 86%

**Response rate**  
(1048 employees vs. 959 in 2023)

**Employee engagement increased from 81 to 83.**

Our overall Engagement index increased 2 points (vs. 2023).

**Engagement scores of the Regions (excl Grids):**

- US: 82  
- Europe: 85  
- APAC: 84



**Most improved questions (compared to 2023) are in the dimensions:**

- Performance
- My Manager
- Collaboration
- Engagement and
- Risk of Employee Turnover

**Least improved questions (compared to 2023) are in the dimensions:**

- Sustainability
- Hybrid working

### 82 Vision & Direction

+2 points compared to 2023

86% has confidence in the future of the company (+1 vs 2023). Senior management gives me a clear picture of the direction the company is headed" scores 76 (+2 vs 2023).

"I have a clear understanding of how my job contributes to the bank-wide strategy of ABN AMRO", shows a score of 84 (+2 vs 2023).

### 89 My Team

+1 point compared to 2023

The question "My team gives me trust" scores 95, which is a very high score we should be very proud of.

"The culture within my team is one where you can learn from your mistakes" increased to 94 (+2)

And "My team gives me feedback which helps me to improve my performance" increased to 82% (+1)

**Focus in 2024 was on:**

1. Senior Management & communication
2. Performance & reward
3. Collaboration

### 90 Inclusive environment

+1 point compared to 2023

We are very proud that we see a high score on this topic.

The question "I am treated with respect and dignity" scores 93.

### 75 Collaboration

+1 point compared to 2023

The question "In my co-operation with other teams the work activities match well" increased to 74 (+4).

Collaboration with other parts of the company stayed at a score of 60. My team works well together, scored 95 in 2024.

### 69 Sustainability

-1 point compared to 2023

68% of the respondents think AAC is a sustainable bank. 84% wants to help build a more sustainable bank.

### 63 Senior management

This dimension shows the same score as in 2023: 19 points higher than the score of ABN AMRO Bank and 18 points higher than Corporate Bank.

72 % of the respondents say there is sufficient contact with Sr. Management. Same score for "The management style in this company encourages employees to give their best".

Sr. Management's actions are consistent with what they say scores 71.

### 86 My manager

+2 points compared to 2023

My Manager asks for feedback to help improve his/her performance stays at 72 (+4 compared to 2023).

- Cross collaboration
- Senior Management
- Achievability

## AACB IT Hub in Iasi, Romania

AACB wants to keep crucial knowledge inside the organisation, which is challenging with an imbalanced internal-to-external workforce. By hiring more internal staff, AACB aims to maintain essential knowledge within AACB while still having a scalable workforce. In 2024, the project team received positive advice from the Global Management Team, and approval from the Supervisory Board, Management Board and the Dutch Works Council to proceed with establishing an IT services legal entity in Iasi, Romania. The primary purpose is to provide internal IT, grid, and data employees for the AACB 1Global organisation. Employees will be directly onboarded as AACB employees but will be supported by a local partner. By the end of 2024, 15 external and 8 internal employees were hired. The new IT staff members are part of the 1Global organisation.

## Diversity and inclusion

AACB aims to create an environment in which all employees are given the opportunity and recognition needed to develop their talents. This in turn will foster growth and success.

Consequently, AACB encourages diversity to support its aspiration of being an organisation in which employees with various profiles feel welcome. The 2024 EES results also confirmed that AACB's inclusive environment is one of its key strengths.

## Ongoing staff and organisational development

AACB strives for a future-proof workforce for a future-proof organisation. In addition to a mandatory curriculum, selective training, knowledge bites and other online informational sessions are offered. Employees are encouraged to develop the skills that are essential for the organisation. Such sessions connect people across regions and departments, and include courses on sustainability, data, leadership, innovation and change and wellbeing, among others.

Because AACB believes that mentoring adds value, a global mentor program is in place, including trainings on what it entails to be a mentor or mentee. This global program connects employees and managers to share knowledge and experiences.



AACB continued the Global Clearing Traineeship with a group of 25 graduates who started in September 2024. And the Global Clearing Academy offered ongoing weekly workshops throughout the year given by and for employees. These covered a wide range of topics, including, among others, clients, products, services, risk, compliance, IT, and data.

Hybrid global learning weeks (one in spring and one in autumn) were organised in 2024 with more than 300 offerings on topics regarding strategy, sustainability and well-being. As in 2023, online topical training and knowledge sessions on our strategic pillars took place. A fifth global Sustainability Week was organised to increase awareness around sustainability throughout the AACB value chain. The program included numerous activities aimed at updating and educating employees on sustainability developments within the industry as well as at improving sustainability at home and in the office. The programs contained presentations by internal and external speakers, workshops, dilemma discussions, and fun challenges.

Despite the competitive labour market, the turnover rate shows a downward trend, decreasing to 6.1% in 2024.





# Risk Management





# Risk Management

## Risk Management Framework

AACB's risk appetite determines the level and nature of risk that AACB is willing to bear in order to pursue our strategy, taking all stakeholders into consideration. Risk management clarifies the use of risk capacity across various risk types, and by doing so, optimises risk and return.

### **Audited** Risk appetite statement

AACB follows the Risk Appetite Framework as per ABN AMRO Risk Management Framework. AACB's risk appetite is aligned with a moderate risk profile. It takes into account all risk types of the risk taxonomy relevant for AACB, such as enterprise risk, credit risk, market risk, liquidity risk, reputational risk, operational risk, information risk, IT risk including cyber risk, sustainability risk, compliance risk and legal risk. The risk appetite statement limits AACB's overall risk-taking capacity across these risk types. It is monitored by benchmarking actual and expected risk profiles so that corrective actions can be defined where necessary. This risk appetite statement has been reviewed and approved by the Clearing Enterprise Risk Committee (CERC), the AACB Management Board, the AACB Supervisory Board and the shareholder.

### **Audited** Risk governance

AACB follows ABN AMRO's three lines of defence model, risk decision framework, and product approval process.

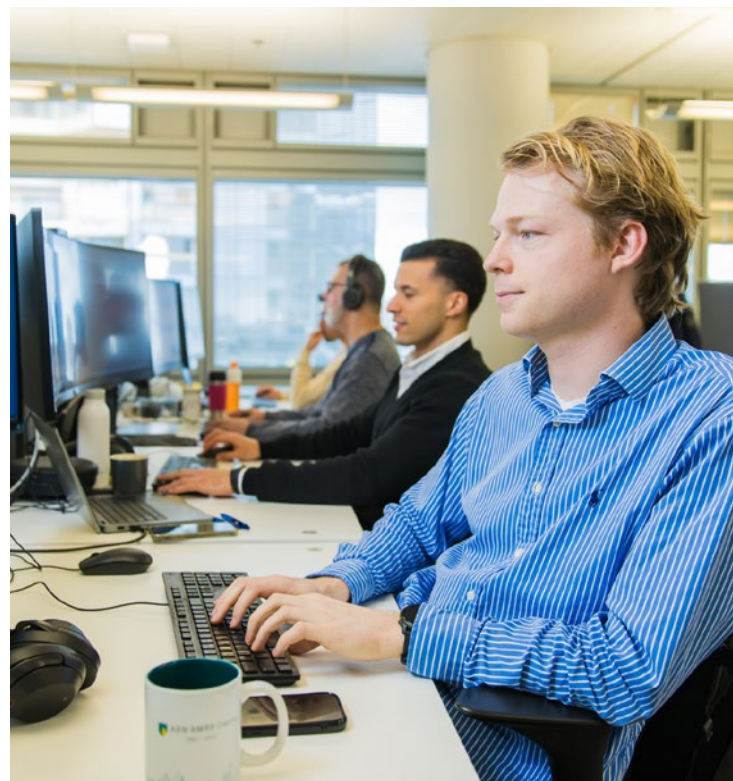
- **1st Line of Defence – Risk ownership**

Risk ownership resides within AACB business teams. Management is primarily responsible for the risks within the organisation, the results, the execution, compliance, and effectiveness of internal controls.

- **2nd Line of Defence – Risk control and oversight**

The AACB Risk Management team is responsible for risk frameworks, policies, providing advice,

risk monitoring, reporting on execution, and risk management and control for AACB. The second line monitors that the first line takes risk ownership. This includes monitoring that policies are being adhered to, and processes are executed in accordance with selected performance goals and risk tolerances. It has approval authority for credit proposals up to predefined thresholds as well as the authority to approve certain counterparties, new products and new proposed activities.



AACB comprises an independent risk organisation with oversight from ABN AMRO, in alignment and within ABN AMRO policies and mandates. Formal responsibility for the management of AACB rests with the AACB Management Board and Supervisory Board. Accountability and the ultimate responsibility for AACB's 2nd Line of Defence risk management resides with the AACB Chief Risk Officer.

At AACB Management Board level, the risk governance is organised through the Clearing Enterprise Risk Committee (CERC) and the ABN AMRO Clearing Credit Committee (AACCC). ABN AMRO oversight is maintained through regular meetings between the Chief Risk Officer and Risk-Type Owners of both ABN AMRO and AACB and via the participation of ABN AMRO delegates in the CERC. Within AACB's risk management framework, three risk type owner roles have been defined: Credit Risk, Market and Liquidity Risk, and Information and Operational Risk.

### • 3rd Line of Defence – Risk assurance

ABN AMRO Group Audit evaluates the effectiveness of AACB governance, risk management and control processes, in order to strengthen management's solution and responsibility.

### Credit risk

Strong risk management is a cornerstone of AACB's business model. Our risk management organisation spans three time zones across the globe. The local risk organisations in the regions (Europe, APAC and the US) are supported and governed by global risk departments in Amsterdam. Local risk management employees monitor client activity on a daily and intraday (near real time) basis to ensure that all clients remain within agreed market and credit risk parameters. The risk department also monitors other counterparty exposures and is involved in managing AACB's risk profile.

AACB does not perform proprietary trading activities and therefore is not exposed to market risk in its own book. Nevertheless, AACB is exposed to indirect market risk due to clearing and financing activities.

As a third-party clearing member, AACB explicitly guarantees the fulfilment of obligations towards clearing houses and other third parties that arise from customer transactions. In the event of a client default, AACB is legally obligated to settle all client positions with the relevant clearing houses, possibly at a loss. AACB provides liquidity lines to clients to support the clients' business opportunities and enable them to hedge their derivatives inventories with shares and bonds.

As a general clearing member to various central counterparties (CCPs), AACB contributes to CCP default funds. In the event a clearing member of a CCP defaults, AACB's contributions could be (partially) depleted in the default management process.

In order to illustrate the amount of inventory financing provided by AACB and the total outstanding client credit facilities (excluding ABN AMRO companies), the figures, including utilisation, are as follows:

EUR billion	31 December 2024	31 December 2023
<b>Total outstanding client credit facilities</b>	45.57	40.26
<b>Total utilisation</b>	19.21	19.41
<b>Of which: total debit cash utilisation</b>	8.44	10.60
<b>Of which: total short stock utilisation</b>	10.76	8.81

AACB risk classifies each client. Clients with elevated risk could be classified as Watch or Default following an assessment of associated triggers. Increased risk classification does not always imply that AACB provisions for this increased risk. In 2024, AACB experienced one client default (2023: 0) on overall outstanding credit lines of EUR 45.57 billion (2023: EUR 40.26 billion). Included in the total unused client credit facilities are revocable credit lines amounting to EUR 26.56 billion (2023: EUR 21.03 billion) and irrevocable credit facilities amounting to EUR 4.5 million (2023: EUR 0.15 billion).

### **Audited** Credit risk mitigation

Audited Credit risk mitigation considers techniques that reduce credit risk associated with a credit facility or exposure on certain counterparties. Credit risk mitigation mainly relates to collateral management and guarantees, offsetting financial assets and liabilities and enforcing master netting agreements.

No AACB client assets were past due as per 31 December 2024.

### Clients

AACB requires clients to deposit collateral to manage credit risk exposure. Collateral or margin requirements





are based on realised changes in the value of a client portfolio as well as the potential changes derived from conservative scenario analysis and stress tests. Assets deposited as collateral include client deposit funds and liquid marketable securities. AACB monitors the value of collateral on a daily and intraday basis.

AACB sets limits to manage client credit risk exposure. These risk parameters relate to the client portfolio and financial characteristics. In the event of a breach in any of the relevant risk parameters, AACB asks clients to deposit additional collateral and/or reduce risk in their portfolios. AACB also has the contractual right to immediately seize and liquidate portfolios if clients fail to meet contractual requirements.

#### **Audited** Limit framework

Credit risk is managed through the developed credit limit framework, in which two additional limits are set for clients that have a financing agreement with AACB. The first limits the stress and liquidation cost exposure in the client trading portfolio, the second limits the amount of ineligible collateral financed by AACB.

In 2024 financial markets remained volatile, driven by the sometimes severe change in market participant expectations on growth, inflation and monetary policy. In particular, the non-move in FED's rate in August led to significant market drops and volatility spike. In the background, the ongoing conflicts in Europe and the Middle East did not lead to extreme movements in financial markets. While power & gas market volatility remained fairly low, the prices of cocoa and coffee showed ongoing price surge and increased volatility.

Throughout 2024, market and credit risks were adequately managed, only a small credit loss was incurred.

### Counterparties

As an intermediary between clients and the financial infrastructure, AACB also runs counterparty risk towards exchanges, brokers, central clearing houses, nostro and settlement banks, and other financial institutions. AACB has a comprehensive framework for monitoring. If necessary, AACB may enact exposure limits to protect its organisation and clients against counterparty risk. In accordance with procedures, counterparty exposure is effectively monitored and managed.

### Offsetting financial assets and liabilities

Financial assets and liabilities are offset, and the net amount is reported on the statement of financial position. Offsetting occurs when there is a legally enforceable right to set off recognised amounts and there is either an intention to settle on a net basis or to realise the asset and settle the liability simultaneously. Credit risk exposure is largely mitigated by receiving collateral from clients.

### Enforceable master netting agreements or similar instruments

Enforceable master netting agreements are concluded between the bank and its clients with provisions that enable netting and offsetting in the event of default. Furthermore, AACB may enter master netting arrangements upon client request, such as derivative clearing agreements, global master repurchase agreements and global master securities lending agreements, which also consider provisions that make it possible to exercise netting and offsetting in the event of client default.

### Systemic risk

Audited Participants in the financial infrastructure are systemically relevant, as a failure of one component may simultaneously affect a large number of parties in the market. Systemic problems can arise if functions of an affected component are not transferred to



another (recovering) party in a timely manner. The ability to do so depends on the size of the activities and specific market characteristics. This includes local laws and legislation as well as participant contingency arrangements. As a clearing member, AACB is part of the financial infrastructure that interconnects various market participants.

The financial infrastructure is regulated and intensively supervised by regulatory authorities. The market infrastructure includes CCPs to mitigate counterparty risk. Clearing members are required to pay initial margins to cover the potential future exposure that a CCP runs on the positions of its clearing members, including client positions. In addition to the paid-up margins, clearing members must also contribute to default funds.

In the event of a clearing member default with losses greater than the initial margin and default contribution of the defaulting clearing member and exceeding the pre-funded own contribution of the CCP, the default contributions of other clearing members will be used to cover the losses. If these are depleted, there are one or multiple mandatory refinancing calls to each of the remaining clearing members up to the prior default fund contribution. Alternatively, a clearing member may in extreme cases forfeit membership. CCP clearing ensures that monetary losses resulting from a clearing member default are covered to a large extent.

In 2024 further work has been done to strengthen the central clearing chains but also to test the current arrangements in the form of fire drills or default management runs. Testing and training ensures all participants are aware of required processes and highlight improvements to implement. The objective is to increase timeliness and quality of a response to a stress or default event. The finalisation of recovery and resolutions plans complete this preparation.

In the table depicted in the following page (table credit quality by internal rating scale mapped to stages), the gross carrying amount of loans and the contractual amount of undrawn loan commitments, classified by internal rating and risk stage is presented. Stage 2 classification of clients requires several qualitative triggers, which are not necessarily dependent on internal ratings. Standard supervisory methods are used for measurement of the exposure value of AACB's client portfolio. This exposure value is used for regulatory and internal risk calculation purposes.

In 2024 for the credit risk of its own client portfolio, AACB applied the risk weights of the Standardised Approach (SA). See next pages for a breakdown of the exposures credit quality scores.

### **Audited** Internal rating scale mapped to external ratings

	UCR (internal rating)	Low PD%	High PD%	Standard & Poor's equivalent	Moody's equivalent	Fitch equivalent
<b>Investment grade</b>	UCR 1	0	0.04	AAA to A+	Aaa to Aa3	AAA to AA-
	UCR 2+	0.04	0.05	A+	A1	A+
	UCR 2	0.05	0.07	A	A2	A+
	UCR 2-	0.07	0.13	A-	A3	A to A-
	UCR 3+	0.13	0.2	BBB+	Baa1	BBB+
	UCR 3	0.2	0.3	BBB	Baa2	BBB
	UCR 3-	0.3	0.47	BBB-	Baa3	BBB-
<b>Sub-investment grade</b>	UCR 4+	0.47	0.78	BB+	Ba1	BB+
	UCR 4	0.78	1.29	BB	Ba3	BB
	UCR 4-	1.29	2.23	BB-	B1	B+
	UCR 5+	2.23	4.24	B	B2	B
	UCR 5	4.24	8.49	B-	Caa	B-
	UCR 5-	8.49	16.97	CCC/C	Caa	CCC/C
	UCR 6+	16.97	99.99	CCC/C	Ca	CCC/C
<b>Default</b>	UCR 6-8			D	C-D	D

**Audited** Credit quality by internal rating scale mapped to stages

(in thousands)

				31 December 2024				31 December 2023			
	Internal rating scale	PD scale	UCR range	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
<b>Loans and advances banks</b>											
Investment grade	0.000 - < 0.035	1	1,009,933	36,879		1,046,812	641,325	36,784		678,109	
	0.035 - < 0.127	2	200,225			200,225	353,853			353,853	
	0.127 - < 0.465	3									
Sub-investment grade	0.465 - < 2.225	4	1,160			1,160	64,780			64,780	
	2.225 - < 16.971	5	80,469			80,469	259			259	
	16.971 - < 100	6+	273			273					
Default		100	6-8								
<b>Total Loans and advances banks</b>				<b>1,292,060</b>	<b>36,879</b>		<b>1,328,939</b>	<b>1,060,218</b>	<b>36,784</b>		<b>1,097,002</b>
<b>Corporate loans</b>											
Investment grade	0.000 - < 0.035	1	8,558,583	69,176	0	8,627,759	8,529,883	46,328		8,576,211	
	0.035 - < 0.127	2	2,772			2,772	3,670			3,670	
	0.127 - < 0.465	3									
Sub-investment grade	0.465 - < 2.225	4									
	2.225 - < 16.971	5									
	16.971 - < 100	6+									
Default		100	6-8			635	635				
<b>Total Corporate loans</b>				<b>8,561,355</b>	<b>69,176</b>	<b>635</b>	<b>8,631,165</b>	<b>8,533,553</b>	<b>46,328</b>		<b>8,579,881</b>
<b>Other loans and advances</b>											
Investment grade	0.000 - < 0.035	1	6,181,538			6,181,538	6,034,738			6,034,738	
	0.035 - < 0.127	2								0	
	0.127 - < 0.465	3								0	
Sub-investment grade	0.465 - < 2.225	4	8,255			8,255	8,917			8,917	
	2.225 - < 16.971	5									
	16.971 - < 100	6+									
Default		100	6-8			1,162	1,162			1,162	1,162
<b>Total Other loans and advances</b>				<b>6,189,793</b>	<b>0</b>	<b>1,162</b>	<b>6,190,955</b>	<b>6,043,655</b>		<b>1,162</b>	<b>6,044,817</b>
<b>Loan commitments and financial guarantee contracts</b>											
Investment grade	0.000 - < 0.035	1	99,469			99,469	241,917			241,917	
	0.035 - < 0.127	2									
	0.127 - < 0.465	3									
Sub-investment grade	0.465 - < 2.225	4									
	2.225 - < 16.971	5									
	16.971 - < 100	6+									
Default		100	6-8								
<b>Total Loan commitments and financial guarantee contracts</b>				<b>99,469</b>			<b>99,469</b>	<b>241,917</b>			<b>241,917</b>
<b>Total</b>											
Investment grade	0.000 - < 0.035	1	15,849,523	106,055		15,955,578	15,447,863	83,112		15,530,974	
	0.035 - < 0.127	2	202,997			202,997	357,523			357,523	
	0.127 - < 0.465	3									
Sub-investment grade	0.465 - < 2.225	4	9,415			9,415	73,698			73,698	
	2.225 - < 16.971	5	80,469			80,469	259			259	
	16.971 - < 100	6+	273			273					
Default		100	6-8			1,797	1,797			1,162	1,162
<b>Total</b>				<b>16,142,677</b>	<b>106,055</b>	<b>1,797</b>	<b>16,250,529</b>	<b>15,879,343</b>	<b>83,112</b>	<b>1,162</b>	<b>15,963,617</b>

**Audited** Offsetting, netting, collateral and guarantees

(in thousands)

31 December 2024

	Carrying amount before balance sheet netting	Balance sheet netting with gross liabilities	Carrying amount	Master netting agreement	Collateral	Total risk mitigation	Surplus collateral	Received guarantees	Net exposure
<b>Assets</b>									
Cash and balances at central banks	71,471		71,471						71,471
Financial assets held for trading	1,653		1,653						1,653
Derivatives	40		40						40
Financial investments	548,094		548,094						548,094
Securities financing	15,219,751	246,044	14,973,707	21,874	13,727,214	13,749,088	908,276		2,132,895
Loans and advances banks	1,326,943		1,326,943	76,421	727,801	804,222	720,799		1,243,520*
Corporate loans at amortised cost	8,630,890		8,630,890	1,581,084	21,625,253	23,302,759	14,719,069	96,422	47,200
Other loans and advances	6,189,793		6,189,793						6,189,793*
Other	224,926		224,926						224,926
<b>Total assets</b>	<b>32,213,561</b>	<b>246,044</b>	<b>31,967,517</b>	<b>1,679,378</b>	<b>36,080,269</b>	<b>37,856,069</b>	<b>16,348,144</b>	<b>96,422</b>	<b>10,459,592</b>
Financial guarantees given	95,000								95,000
Committed credit facilities	4,469								4,469
<b>Total assets</b>	<b>32,313,030</b>								<b>10,559,061</b>

	Carrying amount before balance sheet netting	Balance sheet netting with gross assets	Carrying amount	Master netting agreement	Collateral	Total risk mitigation	Surplus collateral	Received guarantees	Net amount
<b>Liabilities</b>									
Financial liabilities held for trading	114		114						114
Derivatives	100		100						100
Securities financing	3,465,336		3,465,336	14,405					3,450,931
Due to banks	15,245,658		15,245,658	76,421					15,169,237
Due to customers	9,440,204		9,440,204	1,588,552					7,851,652
Other	1,341,790		1,341,790						1,341,790
<b>Total liabilities</b>	<b>29,493,202</b>		<b>29,493,202</b>	<b>1,679,378</b>					<b>27,813,824</b>

The balance sheet amount before balance sheet netting represents the maximum exposure to credit risk.

\* AACB's business model is such that each customers exposure is covered by collateral. The remaining amounts in the net exposure column mainly consist of margin and default funds placed with CCP's and cash in own bank accounts.

(in thousands)

31 December 2023

	Carrying amount before balance sheet netting	Balance sheet netting with gross liabilities	Carrying amount	Master netting agreement	Collateral	Total risk mitigation	Surplus collateral	Received guarantees	Net exposure
<b>Assets</b>									
Cash and balances at central banks	1,080,629		1,080,629						1,080,629
Financial assets held for trading	804		804						804
Derivatives	170		170						170
Financial investments	617,468		617,468						617,468
Securities financing	11,632,054	125,612**	11,506,442	65,634	9,436,846	9,502,480	549,238		2,553,200
Loans and advances banks	1,096,269		1,096,269	242,303	489,487	731,790	487,258		851,737*
Corporate loans at amortised cost	8,579,881		8,579,881	1,407,282	25,037,471	26,693,451	18,197,373	248,697	83,803
Other loans and advances	6,043,655		6,043,655						6,043,655*
Other	151,029		151,029						151,029
<b>Total assets</b>	<b>29,201,959</b>	<b>125,612</b>	<b>29,076,347</b>	<b>1,715,219</b>	<b>34,963,805</b>	<b>36,927,721</b>	<b>19,233,869</b>	<b>248,697</b>	<b>11,382,495</b>
Financial guarantees given	101,563								101,563
Committed credit facilities	146,054								146,054
<b>Total assets</b>	<b>29,449,576</b>								<b>11,630,112</b>

	Carrying amount before balance sheet netting	Balance sheet netting with gross assets	Carrying amount	Master netting agreement	Collateral	Total risk mitigation	Surplus collateral	Received guarantees	Net amount
<b>Liabilities</b>									
Financial liabilities held for trading	7,039		7,039						7,039
Derivatives	118		118						118
Securities financing	2,416,300	188	2,416,112	48,978					2,367,134
Due to banks	14,313,463		14,313,463	242,303					14,071,160
Due to customers	9,428,628		9,428,628	1,423,938					8,004,690
Other	996,634		996,634						996,634
<b>Total liabilities</b>	<b>27,162,182</b>		<b>27,161,994</b>	<b>1,715,219</b>					<b>25,446,775</b>

The balance sheet amount before balance sheet netting represents the maximum exposure to credit risk.

\* AACB's business model is such that each customers exposure is covered by collateral. The remaining amounts in the net exposure column mainly consist of margin and default funds placed with CCP's and cash in own bank accounts.

\*\* 2023 balance sheet netting is restated.



## Liquidity Risk

Underpinned by the nature of client activities, liquidity risk is one of the most material and acute risks for AACB. Depending on market conditions, it is typically fast developing and short-term due to the nature of AACB financial assets: short-term client loans. Client liquidity facilities are primarily uncommitted; therefore, AACB can reduce or even terminate these on short notice. The liquidity funding risk due to potential margin calls is time critical as well as currency and location specific.

AACB funding and liquidity risks arise from several factors, many of which are mostly or entirely beyond our control, such as volatility and disruptions in the financial markets (including repo and stock borrowing and lending markets), client trading strategies or changes in ABN AMRO's funding capabilities. If not managed quickly, a severe liquidity crisis could prevent AACB from meeting obligations regarding client financing and timely posting of margins to CCPs, as well as a breach of regulatory liquidity standards. Failure to meet timelines for CCP margin payments can have severe consequences, including fines and even a (technical) default.

### Liquidity risk management

Liquidity risk management seeks to ensure that AACB can continue business activities under normal and adverse market conditions. Treasury is responsible for cash and funding management; it has several liquidity sources to manage AACB's funding needs. These include:

1. Committed and uncommitted funding lines from ABN AMRO and other banks
2. Client deposits
3. Client collateral and Securities borrowing and lending (SBL) market

### **Audited** Liquidity risk management framework

AACB maintains a comprehensive liquidity risk management framework (LRMF) for withstanding severe liquidity stress and maintaining robust service provision (financing and settlement) to clients, counterparties and CCPs, which is critical to the functioning of global financial markets. The LRMF comprises:

1. Policies and governance
2. Risk appetite statements (RAS)
3. Liquidity risk early warning indicators (EWI)
4. Liquidity stress tests and scenarios
5. Day-to-day liquidity management (procedures)
6. Internal liquidity adequacy assessment plan (ILAAP) and contingency funding plan (CFP)
7. Liquidity buffers

The framework is designed to measure and monitor

liquidity risks on an (intra) day basis. It is implemented across AACB internationally. For the LRMF to remain up to date, AACB Finance (1st line) and AACB Global Market & ALM/Treasury Risk (2nd line) analyse and stress test material contingency liquidity situations that AACB experiences. Individual components of LRMF are regularly reviewed and revised if necessary to capture changes in AACB's liquidity risks. This is imperative for ensuring that the insights necessary for efficient decision-making are available. Moreover, it allows AACB to meet internal and external (regulatory) requirements at all times.

In 2024, LRMF was further strengthened, with the revision of EWIs and increasing global alignment in close cooperation between the regions and AACB Global Market & ALM/Treasury Risk. This ensures consistent LRMF implementation.

### ILAAP

AACB's ILAAP is an integral part of LRMF. As part of the ILAAP, AACB regularly performs a comprehensive review of all framework constituents. A detailed review and inventory of AACB liquidity risks is performed annually. All identified risks and material changes in the risk profile are incorporated in AACB's liquidity stress testing and scenario analysis, as well as in EWIs and trigger levels. AACB uses stress testing to evaluate the robustness of AACB business plans, identify risks in client portfolios, and test the ability to meet regulatory requirements. It is an important methodology and is used to evaluate our risk tolerance for risk appetite setting as well as for assessing the liquidity impact in AACB's organisation.

The ILAAP process is also used to assess the efficiency of risk detection, measurement, and monitoring practices for liquidity risks, as well as to determine adequate levels of various liquidity sources and liquidity buffers. It supports the objective of maintaining AACB's robust funding strategy and efficient liquidity risk management in alignment with AACB business model.

### Monitoring liquidity risk

AACB's Treasury department monitors actual and expected cash movements on an (intra)daily basis – an important part of cash management and funding liquidity management. AACB's Global Market & ALM/Treasury Risk independently monitors liquidity risks daily. This includes:

- EWIs
- RAS limits and checkpoints
- Aggregated client metrics such as utilisation of approved client liquidity lines
- Concentrated risk exposures
- Liquidity coverage ratio (LCR), net stable funding ratio (NSFR) and exposure measure (EM)
- Market and liquidity risk stress estimates

- Market volatility, including tightness in the SBL market
- Forthcoming material events (such as political changes and large corporate actions) that could have an impact on market volatility or trigger changes in client strategies
- Regulatory changes

Developments in AACB’s funding position and liquidity risk profile are discussed in the Clearing Enterprise Risk Committee (CERC) and Clearing Asset and Liability Committee (CALCO) meetings. This ensures that senior management is actively involved in managing liquidity risks, potential issues are quickly identified, and corrective decisions are taken if deemed necessary.

**Audited** Liquidity sensitivity gaps

The following table provides a maturity analysis of the earliest contractual undiscounted cash flows for assets and liabilities. It represents the short-term nature and cash flows of AACB activities. The amounts include accrued interest as stated in the statement of financial position.



**Audited** Liquidity sensitivity gap statement

(in thousands)

31 December 2024

	On demand	Up to one month	Between one and three months	Between three and six months	Between six and twelve months	Between one and five years	Total
Cash and balances at Central banks	71,471						71,471
Financial assets held for trading	1,653						1,653
Derivatives	40						40
Financial investments	377,891		70,330			99,873	548,094
Securities financing assets	12,997,195	754,774	808,939	403,313	9,486		14,973,707
Loans and advances banks	1,326,943						1,326,943
Corporate loans	7,797,048	833,613	229				8,630,890
Other loans and advances	4,010,541		2,179,197	55			6,189,793
Other assets	220,958	2,061	1,907				224,926
<b>Total assets</b>	<b>26,803,740</b>	<b>1,590,448</b>	<b>3,060,602</b>	<b>403,368</b>	<b>9,486</b>	<b>99,873</b>	<b>31,967,517</b>
Financial liabilities held for trading	114						114
Derivatives	100						100
Securities financing liabilities	2,641,393	93,974	729,969				3,465,336
Due to banks	748,612	4,005,436	628,060	403,580	4,459,970	5,000,000	15,245,658
Due to customers	9,440,204						9,440,204
Issued debt						802,789	802,789
Other liabilities	527,601	187	4,267		6,946		539,001
<b>Total liabilities</b>	<b>13,358,024</b>	<b>4,099,597</b>	<b>1,362,296</b>	<b>403,580</b>	<b>4,466,916</b>	<b>5,802,789</b>	<b>29,493,202</b>
<b>Net liquidity surplus / gap</b>	<b>13,445,716</b>	<b>-2,509,149</b>	<b>1,698,306</b>	<b>-212</b>	<b>-4,457,430</b>	<b>-5,702,916</b>	<b>2,474,315</b>
<b>Off-balance sheet liabilities</b>							
Committed credit facilities	4,469						4,469
Guarantees and other commitments	105,650						105,650
<b>Total off-balance sheet liabilities</b>	<b>110,119</b>						<b>110,119</b>

(in thousands)

31 December 2023

	On demand	Up to one month	Between one and three months	Between three and six months	Between six and twelve months	Between one and five years	Total
Cash and balances at Central banks	1,080,629						1,080,629
Financial assets held for trading	804						804
Derivatives	170						170
Financial investments	467,589		68,279			81,600	617,468
Securities financing assets	11,475,227		31,216				11,506,442
Loans and advances banks	1,096,269						1,096,269
Corporate loans	6,420,223	2,159,552	100	5			8,579,881
Other loans and advances	3,982,711		2,060,944				6,043,655
Other assets	146,030	1,096	3,902				151,029
<b>Total assets</b>	<b>24,669,653</b>	<b>2,160,648</b>	<b>2,164,440</b>	<b>5</b>		<b>81,600</b>	<b>29,076,347</b>
Financial liabilities held for trading	7,039						7,039
Derivatives	118						118
Securities financing liabilities	2,416,112						2,416,112
Due to banks	323,982	5,831,220	1,327,042		5,831,220	1,000,000	14,313,463
Due to customers	8,345,611	1,082,899	90	29			9,428,628
Issued debt						600,000	600,000
Other liabilities	386,022	122	3,890		6,600		396,634
<b>Total liabilities</b>	<b>11,478,884</b>	<b>6,914,240</b>	<b>1,331,022</b>	<b>29</b>	<b>5,837,820</b>	<b>1,600,000</b>	<b>27,161,994</b>
<b>Net liquidity surplus / gap</b>	<b>13,190,769</b>	<b>-4,753,592</b>	<b>833,418</b>	<b>-24</b>	<b>-5,837,820</b>	<b>-1,518,400</b>	<b>1,914,353</b>
<b>Off-balance sheet liabilities</b>							
Committed credit facilities	146,054						146,054
Guarantees and other commitments	10,650						10,650
<b>Total off-balance sheet liabilities</b>	<b>156,703</b>						<b>156,703</b>



**Audited** Expected maturity

The following table provides an overview of the amounts expected to be settled within twelve months and after twelve months.

(in thousands)

	31 December 2024			31 December 2023		
	Up to one year	More than one year	Total	Up to one month	More than one year	Total
<b>Cash and balances at Central banks</b>	71,471		71,471	1,080,629		1,080,629
<b>Financial assets held for trading</b>	1,653		1,653	804		804
<b>Derivatives</b>	40		40	170		170
<b>Financial investments</b>	448,221	99,873	548,094	535,868	81,600	617,468
<b>Securities financing assets</b>	14,973,707		14,973,707	11,506,442		11,506,442
<b>Loans and advances banks</b>	1,326,943		1,326,943	1,096,269		1,096,269
<b>Corporate loans</b>	8,630,890		8,630,890	8,579,881		8,579,881
<b>Other loans and advances</b>	6,189,738		6,189,738	6,043,655		6,043,655
<b>Equity accounted investments</b>		285	285		269	269
<b>Property and equipment</b>		23,785	23,785		24,645	24,645
<b>Intangible assets</b>		2,094	2,094		3,177	3,177
<b>Tax assets</b>	31,093	72,003	103,096	39,008	25,439	64,447
<b>Other assets</b>	95,666		95,666	58,491		58,491
<b>Total assets</b>	<b>31,769,422</b>	<b>198,040</b>	<b>31,967,462</b>	<b>28,941,217</b>	<b>135,130</b>	<b>29,076,347</b>
<b>Financial liabilities held for trading</b>	114		114	7,039		7,039
<b>Derivatives</b>	100		100	118		118
<b>Securities financing liabilities</b>	3,465,336		3,465,336	2,416,112		2,416,112
<b>Due to banks</b>	10,245,658	5,000,000	15,245,658	13,313,463	1,000,000	14,313,463
<b>Due to customers</b>	9,440,204		9,440,204	9,428,628		9,428,628
<b>Issued debt</b>		802,789	802,789		600,000	600,000
<b>Provisions</b>	11,184		11,184	8,715		8,715
<b>Tax Liabilities</b>	40,685	11,062	51,748	36,387	8,119	44,505
<b>Other liabilities</b>	476,069		476,069	343,414		343,414
<b>Total liabilities</b>	<b>23,679,350</b>	<b>5,813,851</b>	<b>29,493,202</b>	<b>25,553,877</b>	<b>1,608,119</b>	<b>27,161,994</b>

## 2024 developments in AACB's liquidity position

2024 has been another volatile year for AACB's liquidity position especially in Q4 of 2024, when the markets were impacted by several (geo)political events. Macroeconomic trends, such as fear of the economic slowdown and changing interest rates, continued to have a large impact on equity markets. Within this context, global financial markets confounded gloomy expectations with many major stock indices booking significant gains over the year and inflation also slowly abating. This environment led to high activity of clients in the PTG segment, with their and AACB's liquidity usage at times peaking as a result. Consequently, AACB's liquidity position was often volatile throughout 2024, and liquidity usage has been high from September till the end of the year.

### Market Risk

In addition to the banking book, a number of AACB's business activities, including the synthetic product offering and fractional share trading facilitation, are classified as trading book (according to the CRR book classification). AACB is therefore subject to the relevant solvency regulations, and the market risk stemming from both books needs to be managed and monitored.

#### **Audited** Market risk in the trading book

AACB's market risk within the trading book arises from few business activities focused solely on client facilitation. The resulting market risk exposure is tightly hedged and hence AACB does not run open market risk. While the equity price and FX exposures are fully hedged, the interest rate risk is insignificant due to the overnight term of the underlying interest rate risk. As the market risk is flat, no regulatory (CRR) market risk-related capital requirements are generated. AACB applies the Standardised Approach for market risk capital requirement calculation.

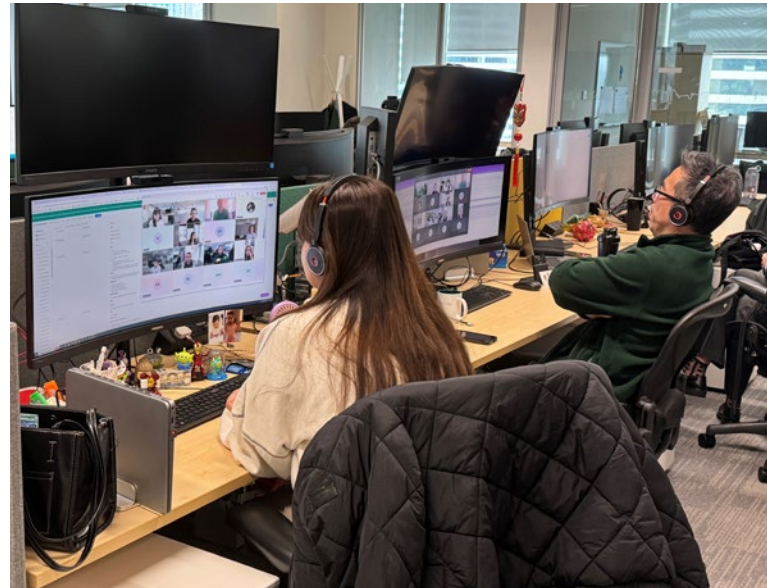
#### **Audited** Market risk in the banking book

Within the banking book, market risk for AACB principally arises in two areas of risk: foreign exchange (FX) risk and interest rate risk.

### FX risk

AACB activities in London, Singapore, Japan, Hong Kong, Sydney, Chicago, and Brazil can result in FX risk for the working capital and/or shareholder equity positions of these foreign entities.

As AACB finances its assets in matching currencies, the resulting FX risk is minimal. Furthermore, the FX risk borne as a result of day-to-day operating activities is mitigated by entering into FX transactions with ABN AMRO Bank. As a result, AACB's overall net open position in foreign currency is not significant as close to zero. The foreign currency translation reserve presented



in the statement of other comprehensive income relates to foreign currency translation exposure upon consolidation. In general, ABN AMRO ALM/Treasury manages ABN AMRO FX risk at the enterprise level.

### Interest rate risk

Interest rate risk is managed according to ABN AMRO's framework as approved by ABN AMRO's Asset & Liability Committee (ALCO). This framework is designed to transfer interest rate risk out of commercial business lines to the central ALM function of ABN AMRO Bank, allowing for clear differentiation between commercial business results and results on unhedged interest rate positions. Execution of ALCO decisions and day-to-day management of interest rate risk is performed by ABN AMRO's ALM/Treasury department.

AACB is not exposed to significant interest rate mismatch risk. Implementation of the new organizational structure in the US, whereby ABN AMRO Securities LLC became part of the US Holding rolling into AA Clearing Bank, introduced some interest risk arising from the term of the respective repo transactions. With the approved PV01 limits of EUR 75K per bp interest rate increase, the exposure is considered insignificant.

## 2024 developments in AACB's market risk position

During 2024, there were no material changes in the market risk profile of AACB, or in the risk appetite for the market risk taking.

### Capital Risk

As a European credit institution, AACB is subject to capital requirements regulations (CRD and CRR) and is therefore required to hold capital to cover financial risks. On a sub-consolidated basis, AACB must meet

minimum regulatory capital requirements expressed as a percentage of RWA. For a more detailed breakdown of EU regulatory capital requirements, please refer to the ABN AMRO financial statements.

AACB foreign subsidiaries are also subject to local regulatory solvency requirements. The most-material AACB entities from a capital consumption perspective are ABN AMRO Clearing USA and ABN AMRO Clearing Hong Kong.

AACB's regulatory capital model ensures that client credit exposures are covered by sufficient capital. In relation to capital requirement calculations, also known as risk weighted assets (RWAs), AACB uses the Standardised Approach for measuring the Counterparty Credit Risk (SA-CCR) for client derivatives exposures and the Financial Collateral Comprehensive method (FCCM) for other client collateralised exposures, as described in Regulation (EU) No 575/2013 (CRR).

The new banking package CRR3/CRD6 entered into force on 9 July 2024 and will largely apply directly to all EU Member States from 1 January 2025. AACB will report under these new rules (Capital Requirements Regulation (EU) 2024/1623) for the first time as per end of March 2025.

### **Audited Capital Risk Management**

The primary objective of our capital management strategy is to ensure that the applicable capital adequacy requirements are met, and that sufficient capital is available to support AACB's strategy. Capital is a necessary resource for doing business and defines commercial possibilities. AACB manages the balance between the available and required capital centrally for optimal use.

The basis of AACB's capital risk management framework comprises AACB's risk appetite, business plans, and local capital requirements for our foreign subsidiaries. Other important factors include external stakeholder (e.g. regulators and counterparties) expectations, market developments, client(s) risk, and contingent capital needs. The main risks to capital are derived from:

- Potential credit losses (direct capital impact)
- RWA fluctuations (impact on the CET1 ratio)
- Specific local issues (e.g. sudden increase of capital deductions due to client positioning, geopolitical risks)
- Low profitability (business model sustainability)

### **Audited Capital Risk Monitoring**

AACB has developed and implemented a capital risk management framework that includes:

- Risk governance
- Monitoring on the CET1 and LR ratios
- Limits on capital excess in material subsidiaries
- Limits on ineligible collateral financing
- Capital EWIs at global and local levels
- ICAAP
- Capital stress testing and scenario analysis
- Trapped capital analysis
- Contingency Funding and Capital Plan (CF&CP)

AACB maintains comfortable buffers in foreign subsidiaries to meet capital requirements from regulatory and internal perspectives. In addition, stress testing indicates that the buffers in place are sufficient to withstand severe but plausible scenarios.

(x EUR 1.000)	31 December 2024	31 December 2023
<b>Capital</b>		
IFRS capital	2,474,316	1,914,352
<b>Composition of regulatory capital:</b>		
- Common Equity Tier 1 (CET1)	2,267,062	1,775,718
<b>Total regulatory capital</b>	<b>2,267,062</b>	<b>1,775,718</b>
Total Risk Exposure Amount (RWA)	7,058,364	6,445,803
CET1 ratio	32.12%	27.55%
Fully loaded leverage ratio (SA-CCR)	6.7%	6.1%

	31 December 2024	31 December 2023
<b>Geographic breakdown RWA</b>		
Europe	60%	58%
US	30%	28%
APAC	10%	14%
<b>Total</b>	<b>100%</b>	<b>100%</b>

	31 December 2024	31 December 2023
<b>RWA breakdown per counterparty</b>		
Clients	44%	50%
Central counterparties (CCPs)	10%	10%
Other*	46%	40%
<b>Third party exposures</b>	<b>100%</b>	<b>100%</b>
AAB intra-group	0%	0%
<b>Total</b>	<b>100%</b>	<b>100%</b>

\* Included in this item is the current credit risk relating to securities lending and borrowing transactions.

	31 December 2024	31 December 2023
<b>Liquidity ratio's</b>		
Liquidity Coverage Ratio (LCR)	161%	131%
Net Stable Funding Ratio (NSFR)	129%	108%



**Audited Contingency capital management**

A CF&CP is in place to address any capital issues that may arise. It provides a framework to detect capital adequacy stress by setting out various EWIs. The CF&CP also sets out a range of actions that can be undertaken, based on the level of severity and urgency of a particular issue.

**Stress testing**

AACB applies stress testing and scenario analysis for various purposes, including:

- **Capital:** capital stress testing is performed to gain insight into the resilience of AACB capital position under adverse changes in the economic environment and regulatory landscape, as well as into AACB-specific circumstances. As part of capital planning, this stress testing is performed semi-annually.
- **Liquidity:** several liquidity stress tests are performed on a periodic basis (daily and quarterly) to determine the impact of market circumstances and client behaviour on AACB's liquidity position. Both historical and hypothetical market risk stress testing are included in the daily liquidity stress testing.
- The annual and quarterly stress testing of capital and liquidity form an integral part of the regular internal capital and liquidity adequacy assessment process (ICLAAP).
- **Internal risk analysis and monitoring:** the outcome of stress testing is used for setting and monitoring risk appetite limits and checkpoints as well as for daily risk analysis purposes.

In recent years there has been an increase in geopolitical events that could ultimately impact AACB. Several possible scenarios have been included in AACB's stress testing.

**Regulatory risk**

AACB operates in a highly regulated environment. Our home regulators are the European Central Bank (ECB), the Dutch Central Bank (DNB) and the Dutch

Authority for the Financial Markets (AFM). Other AACB offices interact with local regulators such as the UK's Financial Conduct Authority (FCA), the Securities and Exchange Commission (SEC) and Commodity Futures Trading Commission (CFTC) in the US, and the Monetary Authority of Singapore (MAS), among others. AACB also deals with numerous exchanges and central clearing houses that impose their own rules and regulations.

Local compliance and legal departments ensure continual compliance with regulations and liaise with regulators to safeguard AACB from regulatory risk. Our Global Regulatory Affairs department also actively engages with principal regulators and policymakers to protect our interests as well as those of our clients.

**Operational risk**

AACB is exposed to operational risk arising from people, business processes, data, and IT infrastructure. Operational risk is the risk of losses resulting from inadequate or failed internal processes, systems, or human error, caused by internal or external events. Resulting in a financial loss and or a disruption of product or services. Some examples of operational risk are wrongful execution of an order, fraud, litigation for legal non-compliance, natural disasters, and cybercrime.

Operational risk within AACB is monitored and controlled by three complementary departments, in line with ABN AMRO's three lines of defence model as described earlier under 'Risk governance'. AACB, like ABN AMRO, embedded a full operational risk control framework exposed to operational risk arising from business processes and information and IT security. This framework is aligned with the regulatory technical standard approach and based on best market practices.

As part of the control framework, various instruments are used to identify, measure, mitigate, and control risks. Instrument types are strategic risk assessments, risk assessments, change risk assessments, stress testing, monitoring control and testing. All risks are measured against AACB's moderate risk profile, which is clearly stated within our risk appetite statement.

**Business continuity management**

Availability of business processes is a key aspect for the internal and external operations of clearing activities. Therefore, business continuity management (BCM) is embedded throughout AACB, complies with ABN AMRO BCM policies and procedures, and follows ISO 22301 standards.

Business continuity plans are in place for each AACB location, the global crisis team assures global coordination. These aim to limit the impact of unexpected events on the continuity of services. Training for business crisis team members is provided on an ongoing basis. Employee participation in business continuity plan



awareness and e-learning sessions is mandatory. Disaster and recovery sessions are held regularly to test key processes and the resilience of IT infrastructure, and to support training for essential employees.

AACB IT infrastructure is monitored to ensure availability, confidentiality, and integrity. Infrastructure availability is continuously monitored for AACB's critical business chains. AACB performs periodic disaster recovery tests for all core systems to assure resilience and to identify aspects for improvement. AACB actively participates in multiple industry wide crisis teams fire drill like ISIDOOR, a large-scale cyber crisis fire drill organised by Dutch government including different critical industries like banks, telecom and electricity.

### ICT risk

The clearing business is IT and information intensive, requiring a strong control framework to ensure the confidentiality, integrity, and availability of business processes and information. To manage threats and risks effectively, framework of risks and control objectives is used to monitor and test the effectiveness of risk mitigating. AACB continuously monitors (external) threats in terms of IT and cyber security. Continuously improving the control environment is a key activity.

#### **Audited** Information risk monitoring

AACB has developed and implemented an information risk management framework that includes:

- Risk governance
- Monitoring with risk indicators measuring
- Availability of service
- Cyber risk posture
- Risk of data leakage
- Information risk control framework based on best market practices
- IT and Information risk capability maturity measuring
- Stress testing
- Ethical hacking (red teaming)

### 2024 developments in AACB's information risk position

The cyber threat landscape increased in 2024 among others driven by the geopolitical unrest in the world. This led to a large increase of cyber events affecting industry parties and vendors. AACB continuously monitors the performance of IT and information risk capabilities by an extensive list of key risk indicators and key performance indicators. To safeguard the necessary oversight dedicated (risk) committees are installed to ensure governance and scrutiny to the different risk areas, amongst others: Global Clearing Information Risk Committee and Cloud Tower. Strong focus of 2024 was on EU regulation of Digital Operational Resilience Act (DORA), enforced per January 17th, 2025.







## Fraud Risk

Fraud is a complex phenomenon with increasing impact on society, AACB and its clients. It can arise from internal or external events (including cyber fraud) and result in financial loss (including unavailability of services), reputational damage and/or regulatory fines. Within AACB the first and second line closely collaborate to identify potential fraud risks and implement fraud risk management framework when applicable, that enables the AACB to manage and mitigate fraud risk. A fraud risk assessment is an integral part of the AACB Systematic Integrity Risk Assessment (SIRA) as well as operational risk instruments risk assessment and stress testing. The focus has predominantly been on identification of fraud risk, formalizing and improving roles and responsibilities regarding fraud prevention, detection, and response. AACB is guided by the development of a fraud risk reference control library by ABN AMRO. Besides that, improvement of the fraud management information by ABN AMRO and AACB fraud posture resulted in increased insights, quality of risk assessments and steering on the risk.

AACB maintains a zero tolerance to fraud, and acknowledges that fraud is an accelerating risk, especially as the bank is digitalizing and the proliferation of technology presents unprecedented opportunities for fraud (e.g. voice cloning through AI-software). With regards to internal fraud the bank continuously monitors and assesses fraud risks related to employee fraud (insider threat) and bribery and corruption risk.

AACB will continue its effort to prevent fraud. Key actions included the following:

- Executing the fraud risk management framework
- Awareness of staff
- Expertise in conducting fraud investigation

## Sustainability Risk

Sustainability Risk is a risk that influences credit, market, liquidity, and operational risk. The impact of physical- and transition risks can lead to unpredictability and volatility on the financial markets. AACB continuously develops stress scenarios to monitor impact. This is an integral part of AACB's annual capital and liquidity plan.

Besides the impact that ESG-risk can have on AACB's clients' portfolio, ESG-risk can have an impact on the operation and reputation of AACB and its clients. AACB conducts a sustainability assessment in the client lifecycle to review AACB clients' sustainability characteristic. This assessment provides an analysis on whether to start or to continue a client relationship. Corporate Clients are subject to higher ESG-requirements. The Sustainability Watch Group (SWG) is mandated to perform a further assessment and, if needed, provide advice towards the Client Acceptance and Risk Acceptance Committee (CARAC).

AACB implemented relevant sustainable finance regulations, such as the Corporate Sustainability Reporting Directive (CSRD) and the ECB Guide on Climate and Environmental Risks (ECB Guide on CER). Risk Management monitors the implementation of the sustainable finance regulations throughout AACB.



# Annual Financial Statements

Notes to the consolidated annual financial statements	61
Accounting policies	62
Company Financial Statements	105
Accounting principles for the company statement	109
Acquisitions	117
Rules on profit appropriation as set out in the Articles of Association	118
Profit appropriation	119



## Consolidated statement of profit or loss

(x EUR 1,000)

	Note	2024	2023
<b>Income</b>			
Interest income calculated using the effective interest method		2,018,375	1,638,963
Other interest and similar income		15,685	13,514
Interest expenses calculated using the effective interest method		1,684,678	1,346,048
Other interest and similar expense		1,241	686
<b>Net interest income</b>	2	<b>348,141</b>	<b>305,743</b>
Fee and commission income		511,450	457,087
Fee and commission expenses		124,578	110,431
<b>Net fee and commission income</b>	3	<b>386,872</b>	<b>346,656</b>
Net trading income	4	28,527	-11,023
Share of result in equity accounted investments	5	-1	-5
Other operating income	6	5,587	18,509
<b>Operating income</b>		<b>769,126</b>	<b>659,880</b>
<b>Expenses</b>			
Personnel expenses	7	184,880	160,981
General and administrative expenses	8	175,696	195,240
Depreciation and amortisation of (in)tangible assets	9	11,693	7,740
<b>Operating expenses</b>		<b>372,269</b>	<b>363,961</b>
Impairment charges on financial instruments	10	1,533	-3,175
<b>Total expenses</b>		<b>373,802</b>	<b>360,786</b>
<b>Operating profit / (loss) before taxation</b>		<b>395,324</b>	<b>299,094</b>
Income tax expense	11	111,316	67,845
<b>Profit (loss) for the year</b>		<b>284,008</b>	<b>231,249</b>
Attributable to: Owner of the company		284,008	231,249

## Consolidated statement of comprehensive income

(x EUR 1,000)

	Note	2024	2023
<b>Profit for the period</b>		<b>284,008</b>	<b>231,248</b>
Other comprehensive income:			
Items that will not be reclassified to the income statement			
Items that will not be reclassified to the income statement before taxation			
Income tax relating to items that will not be reclassified to the income statement	32		
Items that will not be reclassified to the income statement after taxation			
Items that may be reclassified to the income statement			
(Un)realised gains/(losses) currency translation	32	59,152	38,782
(Un)realised gains/(losses) fair value through OCI	32	38	42
<b>Other comprehensive income for the period before taxation</b>		<b>59,190</b>	<b>38,740</b>
Income tax relating to items that may be reclassified to the income statement	32	19	21
<b>Other comprehensive income for the period after taxation</b>		<b>59,171</b>	<b>38,761</b>
<b>Total comprehensive income/(expense) for the period after taxation</b>		<b>343,179</b>	<b>192,487</b>
Total comprehensive income attributable to:			
<b>Owner of the company</b>		<b>343,179</b>	<b>192,487</b>





## Consolidated statement of financial position

(x EUR 1,000)

	Note	31 december 2024	31 december 2023
<b>Assets</b>			
Cash and balances at central banks	12	71,471	1,080,629
Financial assets held for trading	13	1,653	804
Derivatives	14	40	170
Financial investments	15	548,094	617,468
Securities financing	17	14,973,707	11,506,442
Loans and advances banks	18	1,326,943	1,096,269
Corporate loans at amortised cost	19	8,630,890	8,579,881
Other loans and advances	19	6,189,793	6,043,655
Equity accounted investments	22	285	269
Property and equipment	23	23,785	24,645
Intangible assets	24	2,094	3,177
Tax assets	25	103,096	64,447
Other assets	26	95,666	58,491
<b>Total assets</b>		<b>31,967,517</b>	<b>29,076,347</b>
<b>Liabilities</b>			
Financial liabilities held for trading	13	114	7,039
Derivatives	14	100	118
Securities financing	17	3,465,336	2,416,112
Due to banks	27	15,245,658	14,313,463
Due to customers	28	9,440,204	9,428,628
Issued debt	29	802,789	600,000
Provisions	30	11,184	8,715
Tax liabilities	25	51,748	44,505
Other liabilities	31	476,069	343,414
<b>Total liabilities</b>		<b>29,493,202</b>	<b>27,161,994</b>
<b>Equity</b>			
Share capital		15,000	15,000
Share premium		338,024	5,363
Other reserves (incl. retained earnings/profit for the period)		2,009,697	1,841,563
Accumulated other comprehensive income		111,595	52,426
<b>Equity attributable to owner of the company</b>	<b>32</b>	<b>2,474,316</b>	<b>1,914,352</b>
<b>Total Equity</b>		<b>2,474,316</b>	<b>1,914,352</b>
<b>Total Liabilities and Equity</b>		<b>31,967,518</b>	<b>29,076,346</b>
Committed credit facilities	33	4,469	146,054
Guarantees and other commitments	33	105,650	112,213

## Consolidated statement of changes in equity

(x EUR 1,000)

	Share capital	Share Premium	Other reserves		Accumulated other comprehensive income (note 32)			Total Equity
			Retained earnings	Unappropriated result of the year	Fair value reserve	Currency translation reserve	Net investment hedging reserve	
Balance at 1 January 2023	15,000	5,363	1,422,762	187,768	-32	138,951	-47,732	1,722,080
Total comprehensive income				231,248	21	-38,782		192,487
Transfer			187,768	-187,768				
Other			-215					-215
Balance as at 31 December 2023	15,000	5,363	1,610,315	231,248	-11	100,169	-47,732	1,914,352
Balance at 1 January 2024	15,000	5,363	1,610,315	231,248	-11	100,169	-47,732	1,914,352
Total comprehensive income				284,008	18	59,152		343,178
Transfer			231,248	-231,248				
Dividend payment			-116,000					-116,000
Increase of capital		332,661*						332,661
Other			128					128
Balance as at 31 December 2024	15,000	338,024	1,725,690	284,008	7	159,321	-47,732	2,474,318

\* As part of the US common control transaction, share premium increased by EUR 183 million, due to the addition of the US entities.

Moreover, AACB received EUR 150 million cash as share premium from AAB, to cover for regulatory requirements.



## Consolidated statement of cash flows

(x EUR 1,000)

	Note	2024	2023
<b>Profit after taxation</b>		<b>284,008</b>	<b>231,248</b>
<b>Adjustments on non-cash items included in profit:</b>			
Net (un)realised gains/losses		-209,083	84,936
Income of equity associates and partnerships	5	-1	-5
Depreciation, amortisation of (in)tangible assets	9	11,693	7,740
Provisions and impairments		-104	-5,545
Income tax expenses	11	111,316	67,845
Other non cash adjustments		-248	0
<b>Changes in operating assets and liabilities:</b>			
Loans and advances banks		-124,121	-6,418
Corporate loans		197,836	-2,310,079
Other loans and advances		-2,577	719,952
Financial instruments held for trading and securities transactions		-2,317,869	-977,736*
Due to banks		785,674	-140,404
Due to customers		-186,525	-269,917
Net changes in all other operational assets and liabilities		210,651	-586,603*
Income taxes paid		-44,819	-49,653
<b>Cash flow from operating activities</b>		<b>-1,284,171</b>	<b>-3,234,639</b>
<b>Investing activities:</b>			
Purchases of financial investments	15	-43,549	-81,978
Purchase of subsidiary			-106,919
Addition of subsidiary		42,193	
Proceeds from sales, maturities and redemptions	15	147,202	250,056
Dividend from financial investments	15	4,039	3,337
Purchases of property and equipment	23	-7,438	-12,429
Disposal of property and equipment		1	4,298
Purchases of other (in)tangible assets	24	-926	-3,232
Disposal of other (in)tangible assets		-	334
Other changes		-	-1,584
<b>Cash flow from investing activities</b>		<b>141,523</b>	<b>51,883</b>
<b>Financing activities:</b>			
Capital increase		150,000	
Issuance of debt certificates	29	202,789	600,000
Payment of debt certificates	29	-	-600,000
Dividend paid to shareholders (incl. dividend to minorities)		-116,000	7,235
Payment of lease liabilities		-8,511	-6,219
<b>Cash flow from financing activities</b>		<b>228,278</b>	<b>1,016</b>
<b>Net increase (decrease) of cash and cash equivalents</b>		<b>-914,370</b>	<b>-3,181,740</b>
<b>Cash and cash equivalents as at 1 January</b>		<b>2,070,509</b>	<b>5,272,568</b>
Effect of exchange rate variance on cash and cash equivalents		12,323	-20,319
<b>Cash and cash equivalents as at 31 December</b>		<b>1,168,463</b>	<b>2,070,509</b>
<b>Supplementary disclosures of operating cash flow information</b>			
Interest income received		2,044,187	1,633,031
Interest expense paid		-1,691,101	-1,337,949

\* EUR 359 million is restated in the 2023 Statement of cash flows from Net changes in all other operational assets and liabilities to Financial instruments held for trading and securities transactions.

The cash position decreased with EUR 902 million, including EUR 12 million related to foreign currency translation differences. The non-cash activities were mostly impacted by movements in the fair value reserves, depreciation and amortization and provisions. The operating activities fluctuated as a result of changes in securities financing and corporate loans. The variance in the investing activities was mostly attributable to the sale of financial investments, primarily government bonds and the addition of subsidiaries. The financing activities changed as a result of payments of lease liabilities, a dividend payout, issuance of debt certificates and a capital increase following the addition of subsidiaries.

The addition of subsidiary relates to EUR 42 million in cash and cash equivalents in the US subsidiaries. As part of the common control transaction AACB acquired the following assets and liabilities: securities financing assets (EUR 4,451 million), tax assets (EUR 93 million), other assets (EUR 45 million), Securities financing liabilities (EUR 4,345 million), due to banks (EUR 63 million), provisions (EUR 21 million) and other liabilities (EUR 20 million).

The supplementary disclosure contains interest income or interest expense which is actually received or paid in cash, excluding accruals.



# Notes to the consolidated annual financial statements



# 1. Accounting policies

The notes to the Consolidated Annual Financial Statements, including the audited information in the Risk Management chapter, are an integral part of these Annual Financial Statements. This section describes AACB's material accounting policies and critical accounting estimates or judgements relating to the Annual Financial Statements. If an accounting policy or a critical accounting estimate relates to a specific note, it is included in the relevant note.

The Annual Financial Statements were prepared by the Management Board and authorised for issue by the Supervisory Board and Management Board on 16 May 2025.

For the purpose of its consolidated subsidiaries ABN AMRO has issued notices of liability. Based on this, ABN AMRO is jointly and severally liable for any liability arising from the legal acts performed by AACB.

In principle, AACB is not engaged in any proprietary trading, operates at arm's length of ABN AMRO and therefore, provides clearing services as an independent market participant with its focus on third parties.

Third-party clearing means that AACB guarantees its clients vis-à-vis the exchanges and central counterparties and undertakes the risk management of the (financial) positions of these often globally operating clients. AACB also handles the administration of positions and the financing of these positions for clients. The clients are predominantly on-exchange traders and professional trader groups but AACB also services financial institutions, banks, fund managers and brokers with its product portfolio.

## Statement of compliance

The Consolidated Annual Financial Statements have been prepared in accordance with International Financial Reporting Standards (IFRS), as endorsed by the European Union EU). They also comply with the financial reporting requirements set out in Title 9 of Book 2 of the Dutch Civil Code, where applicable.

## Basis of preparation

The Consolidated Annual Financial Statements have been prepared on a historical cost basis, except for certain items that are measured at fair value. Derivative financial instruments, financial assets and liabilities held for trading or designated as measured at fair value through profit or loss and financial instruments not held in a 'hold to collect' business, are measured at fair value through profit or loss. Certain interest-earning financial investments are valued at fair value through other comprehensive income (FVOCI). As these instruments do not meet the requirements regarding frequency of sales, they are not classified in a 'hold to collect' business model. Associates and joint ventures are accounted for using the equity method.

The Annual Financial Statements are presented in euros, which is the presentation currency of AACB, rounded to the nearest thousand (unless otherwise stated).

The financial statements are prepared on a going concern basis.





## Changes in accounting policies

### Amendments to existing standards

The International Accounting Standards Board (IASB) issued a number of amendments to existing standards (and endorsed by the EU), which became effective for the reporting period beginning 1 January 2024. The standards amended are:

- IAS 1 Presentation of Financial Statements
- IAS 7 Statement of Cash flows and IFRS 7 Financial Instruments: Disclosures: Supplier Finance Arrangements
- IFRS 16 Leases: Lease liability in a sale and leaseback

The impact of these amendments on the consolidated financial statements are insignificant for AACB and have not resulted in major changes to AACB's accounting policies.



### New standards, amendments and interpretations not yet effective

The IASB has issued the following new standards. These new standards will become effective on 1 January 2027 if these standards are endorsed by the EU. AACB will not early adopt these amendments.

### IFRS 18 Presentation and Disclosure in Financial statements

In April 2024 the IASB issued IFRS 18, which is set to replace IAS 1 Presentation and Disclosures in Financial Statements. The main changes introduced by IFRS 18 relate to three areas:

- Presentation of two new defined subtotals in the statement of profit or loss and consistent classification of income and expenses in categories. Five categories have been identified in the standard - operating, investing, financing, income taxes and discontinued operations.
- Disclosure of information about management-defined performance measures in the notes to the financial statements.
- Enhanced requirement for grouping (aggregation and disaggregation) of information.

These changes are focused on the statement of profit or loss and relate solely to presentation and disclosure requirements. The expected impact of these changes on the consolidated financial statements of AACB is still being investigated.

### IFRS 19 Subsidiaries without Public Accountability

In May 2024 the IASB issued IFRS 19, which specifies disclosure requirements that certain entities are allowed to apply instead of the disclosure requirements in other IFRS Accounting standards. Given that AACB is not an entity that can apply IFRS 19, this new standard does not impact AACB.

### Amendments to existing standards not yet effective

The IASB has issued amendments to several standards, which have not yet been endorsed by the EU and are therefore not open for early adoption. These amendments are to take effect on or later than 1 January 2025. The standards amended are:

- IFRS 9 and IFRS 7 Classification and Measurement of Financial Instruments
- IAS 21 The Effects of changes in foreign exchange rates: lack of exchangeability
- Annual Improvements Volume 11
- Contracts Referencing Nature-dependent Electricity – Amendments to IFRS 9 and IFRS 7

AACB is still investigating the impact of these amendments, but preliminary results show that no significant impact is expected.

### Critical accounting estimates and judgements

In preparing the financial statements, management needs to exercise its judgement in the process of applying AACB's accounting policies and make estimates and assumptions concerning the future. Actual results may differ from those estimates and assumptions. Accounting policies for the most significant areas that require management to make judgements and estimates affecting reported amounts and disclosures are made in the following sections:

- Impairment losses on financial assets measured at amortised costs – Note 10



- Income tax expense, tax assets and tax liabilities – Notes 11, 25 and 32
- Fair value of financial instruments – Notes 16 and 20
- Provisions – Note 30

### Assessment of risks, rewards and control

Whenever AACB is required to assess risks, rewards and control, as well as when considering the recognition and de-recognition of assets or liabilities and the consolidation or de-consolidation of subsidiaries, the use of judgement may sometimes be required. Although management uses its best knowledge of current events and actions in making such assessments, the actual risks, rewards and control may ultimately differ.

## Material accounting policies

### Basis of consolidation

The Consolidated Annual Financial Statements of AACB include the financial statements of the parent company and its controlled entities, thus incorporating the assets, liabilities, revenues and expenses of AACB and its subsidiaries.

Subsidiaries are included using the same reporting period and consistent accounting policies. Inter company balances and transactions, as well as any related unrealised gains and losses, are eliminated in preparing the Consolidated Financial Statements.

The Annual Financial Statements of AACB include the following subsidiaries and branches:

### Foreign currency

AACB applies IAS 21 The Effects of Changes in Foreign Exchange Rates. Transactions in foreign currencies are translated into euros at the rate prevailing on the transaction date. Foreign currency balances of monetary items are translated into euros at period-end exchange rates. Exchange gains and losses on such balances are recognised in the income statement.

The Consolidated Annual Financial Statements are stated in euros, which is the presentation and functional currency of AACB. The bank's foreign operations may have different functional currencies. The functional currency is the currency that best reflects the economic substance of the underlying event and circumstances relevant to that entity. Prior to consolidation (or equity accounting), the assets and liabilities of non-euro operations are translated into euros at the closing rate, and items in the income statement and other comprehensive income are translated at the rate prevailing on the transaction dates. Exchange differences arising on the translation of foreign operations are included in the currency translation reserve within equity. These amounts are transferred to the income statement when the bank loses control, joint control or significant influence over the foreign operation.

The following table shows the rates of the relevant currencies for AACB:

Name	Entitlements	Established in the year	Consolidated in the year	Place registered office	Country
ABN AMRO Clearing USA LLC	100%	1994	2009	Chicago	United States
ABN AMRO Clearing Hong Kong Ltd	100%	1995	2008	Hong Kong	Hong Kong
ABN AMRO Clearing Sydney Pty Ltd	100%	1998	2008	Sydney	Australia
ABN AMRO Clearing Bank London Branch	N/A	2004	2004	London	United Kingdom
ABN AMRO Clearing Singapore Pte	100%	2005	2005	Singapore	Singapore
ABN AMRO Clearing Tokyo Co Ltd	100%	2007	2007	Tokyo	Japan
ABN AMRO Clearing Bank Singapore Branch	N/A	2009	2009	Singapore	Singapore
ABN AMRO Clearing Investments BV	100%	2014	2014	Amsterdam	The Netherlands
ABN AMRO Clearing London Ltd	100%	2018	2018	London	United Kingdom
Banco ABN AMRO Clearing S.A.	100%	2005	2023	São Paulo	Brazil
ABN AMRO Corretora de Títulos e Valores Mobiliari	100%	2021	2023	São Paulo	Brazil
ABN AMRO Holdings USA LLC	100%	2009	2024	New York	United States
ABN AMRO Securities USA LLC	100%	2009	2024	New York	United States
AAC IT Services Romania S.R.L.	100%	2024	2024	Iași	Romania

	Rates at year end		Average rates	
	2024	2023	2024	2023
<b>1 Euro =</b>				
<b>Pound Sterling</b>	0.83	0.87	0.85	0.87
<b>Singapore Dollar</b>	1.42	1.46	1.45	1.45
<b>Japanese Yen</b>	163.19	155.79	163.86	151.95
<b>Hong Kong Dollar</b>	8.09	8.63	8.44	8.47
<b>Australian Dollar</b>	1.68	1.62	1.64	1.63
<b>US Dollar</b>	1.04	1.11	1.08	1.08
<b>Brazilian Real</b>	6.43	5.36	5.83	5.40
<b>Romanian Leu</b>	4.97	4.97	4.97	4.95

## Financial assets and liabilities

### Classification and measurement of financial assets

AACB classifies financial assets based on the business model in which they are held in accordance with IFRS 9. The business model is determined at portfolio level. Portfolios are based on how AACB manages financial assets in order to achieve a particular business objective. The business model assessment is based on the level of sales, risk management, performance evaluation and management compensation. Derecognition is used as a condition to determine whether a transaction results in a sale.

Three business models are distinguished:

- ‘Hold to collect’ business model, in which cash flows are primarily generated by collecting contractual cash flows until maturity of the financial instrument. Sales can occur, as long as they are incidental, infrequent and insignificant. The assessment of the frequency and significance of sales is determined for each underlying portfolio. Sales that result from increases in the credit risk of the counterparty or take place close to maturity do not contradict the ‘hold to collect’ business model;
- ‘Hold to collect and sell’ business model, in which the selling of financial assets is integral to achieving the business objective. In this business model, sales take place more frequently and have a greater value than in a ‘hold to collect’ business model;
- Other business models not meeting the criteria of the business models mentioned above, for example business models in which financial assets are managed with the objective of generating cash flows from sales (trading book), are measured at FVTPL.

After the business model has been determined, the contractual cash flows of financial assets are assessed. Debt instruments can be classified at amortised cost or FVOCI only when the contractual cash flows are solely

payments of principal and interest (SPPI). Contractual cash flows that are SPPI are consistent with a basic lending arrangement in which consideration for the time value of money and credit risk are typically the most significant interest elements. Debt instruments that do not meet the SPPI requirements are mandatorily measured at FVTPL. Financial assets are assessed in their entirety, including any embedded derivatives that are not separated from the host contract.

Based on the business model determined and the SPPI assessment, the following measurement categories are identified under IFRS 9:

- Amortised cost – Financial instruments measured at amortised cost are debt instruments within a ‘hold to collect’ business model with fixed or determinable payments which meet the SPPI criteria. These instruments are initially measured at fair value (including transaction costs) and subsequently measured at amortised cost using the effective interest rate method. Financial instruments measured at amortised cost are presented net of credit loss allowances in the statement of financial position.
- FVTPL – Financial instruments measured at FVTPL include instruments held for trading, derivatives, equity instruments for which the FVOCI option has not been elected and instruments whose cash flows do not meet the SPPI requirements. Changes in the fair value of these instruments are directly recognised in the income statement.
- FVOCI – Financial instruments measured at FVOCI are debt instruments which are held in a ‘hold to collect and sell’ business model and which meet the SPPI criteria. They are initially measured at fair value, with subsequent unrealised changes recognised in other comprehensive income. Equity instruments for which the fair value option is elected are also measured at FVOCI.

Reclassifications of financial assets are expected to be very infrequent and occur only when AACB changes its business model for a certain portfolio of financial assets.



## Classification of assets and liabilities held for trading

A financial asset or financial liability is classified as 'held for trading' if it is:

- Acquired or incurred principally for the purpose of selling or repurchasing it in the near term
- Part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit making, or
- A trading derivative (except for a derivative that is a designated and effective hedging instrument)

## Classification and measurement of financial liabilities

Financial liabilities are initially recognised at their fair value minus transaction costs that are directly attributable to the acquisition or issue of the financial liability. Under IFRS 9, financial liabilities are classified as subsequently measured at amortised cost, except for the following instruments:

- Financial liabilities held for trading are measured at fair value through profit or loss
- Financial liabilities that AACB has irrevocably designated as held at fair value through profit or loss at initial recognition, which are held to reduce an accounting mismatch, are managed on the basis of their fair value or include terms that have derivative characteristics by nature.

Under IFRS 9, the changes in fair value attributable

to changes in the credit risk of financial liabilities designated at FVTPL are presented in other comprehensive income. The cumulative amount of changes in fair value attributable to credit risk of such liabilities is presented as liability own credit risk reserve in equity.

Financial liabilities are never reclassified after initial recognition.

## Recognition and de-recognition

Traded instruments are recognised on the trade date, which is defined as the date on which AACB commits to purchase or sell the underlying instrument. If the settlement terms are non-standard, the commitment is accounted for as a derivative between the trade and settlement dates. Loans and advances are recognised when they are acquired or funded AACB and de-recognised when settled. Issued debt is recognised when issued, and deposits are recognised when the cash is deposited with AACB. Other financial assets and liabilities, including derivatives, are recognised when AACB becomes a party to the contractual provisions of the asset or liability.

Financial assets are derecognised when AACB loses control and the ability to obtain benefits from the contractual rights that comprise that asset. This occurs when the rights are realised or expire, or when substantially all risks and rewards are transferred. Financial assets are also derecognised if the bank has neither transferred nor retained substantially all risks and rewards of ownership, but control has passed to the transferee. Financial assets continue to be recognised in the balance sheet, and a liability recognised for the proceeds of any related funding transaction, unless a





## Change in credit quality since initial recognition

Stage 1	Stage 2	Stage 3
<b>Performing</b> (Initial recognition)	<b>Credit quality deteriorated</b> (Assets with significant increase in credit risk since initial recognition)	<b>Default = Impaired</b> (Credit impaired assets)
<b>Recognition of ECL</b>		
<b>12 month ECL</b>	<b>Lifetime ECL</b>	<b>Lifetime ECL</b>
<b>Interest income</b>		
Effective interest on gross carrying amount	Effective interest on gross carrying amount	Effective interest on amortised cost (gross carrying amount less loss allowance)

fully proportional share of all or specifically identified cash flows are transferred to the lender without material delay and the lender's claim is limited to those cash flows, and substantially all the risks, rewards and control associated with the financial instruments, that have been transferred, in which case that proportion of the asset is derecognised.

When the terms and conditions of a financial asset have been renegotiated or otherwise modified to the extent that, substantially, it becomes a new financial asset, AACB derecognises the financial asset, with the difference recognised in the income statement, to the extent that an impairment loss has not already been recorded. The newly recognised financial asset is classified as stage 1 for ECL measurement purposes. AACB assesses, in both qualitative and quantitative terms, whether such modifications are substantial. Generally, a 10% change in the net present value of the cash flows between the initial and new contract results in a derecognition. With regard to substantial modifications, e.g. due to forbearance measures, the derecognition gains or losses are recognised in net gains/(losses) on derecognition of financial assets measured at amortised cost and disclosed separately, if material.

If the modification of the financial asset does not result in derecognition, the gross carrying amount of the financial asset is recalculated, based on the net present value of the new contractual cash flows, and discounted at the financial asset's original effective interest rate. The effect is recognised and disclosed as a modification gain or loss in the income statement. Credit related modification gains or losses (i.e. due to forbearance measures) are recognised in the income statement and presented under impairment charges on financial instruments. Non-credit related modification gains or losses are recognised in the income statement and

presented under interest income calculated using the effective interest method.

Financial liabilities are derecognised when the liability has been settled, has expired or has been extinguished. An exchange of an existing financial liability for a new liability with the same lender on substantially different terms, qualitatively and quantitatively (a 10% difference in the present value of the cash flows), is accounted for as an extinguishment of the original financial liability and recognition of a new financial liability. The difference between the former amortised cost and the consideration paid is recognised in the income statement.

### Measuring allowances for expected credit losses (ECL)

The IFRS 9 impairment requirements are applicable to financial assets measured at amortised cost or fair value through other comprehensive income (FVOCI), loan commitments, lease receivables and contract assets and financial guarantee contracts. At each reporting date, these financial instruments are classified into one of three risk stages, depending on current credit quality.

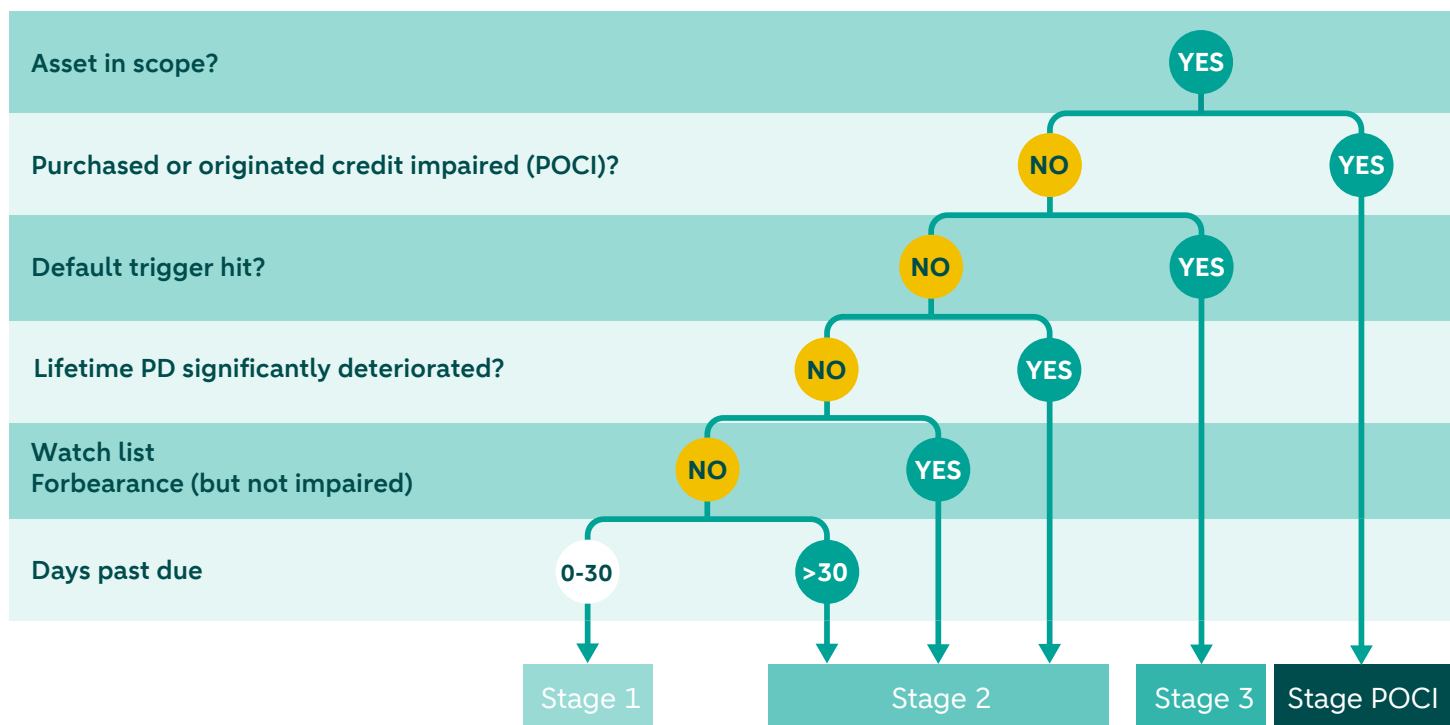
### Classification in stage 2

Quantitative and qualitative stage triggers are used to determine whether a financial instrument should be classified as stage 1 or stage 2.

### Quantitative stage triggers

The key quantitative metric that determines when a financial instrument is transferred from stage 1 to stage 2 is the deterioration in the lifetime probability of default (LPD) from the date of origination to the reporting date, based on internal data. The LPD represents the likelihood that a counterparty will default during the lifetime of the financial instrument and depends on credit risk drivers such as:

## Asset stages



- product characteristics (e.g. repayment and interest terms, term of the product)
- the financial condition of the borrower
- the number of days past due
- expected developments in the economy

The lifetime PD deterioration (LPDD) measures the relative difference between the remaining lifetime PD at reporting (LPDR) and the remaining lifetime PD at origination (LPDO) as  $LPDD = LPDR/LPDO$ . If the LPD deterioration of an exposure is above a predefined threshold, the LPD is considered to be significantly deteriorated. The exposure is then transferred to stage 2 and impairment allowances equal to the lifetime expected credit loss are recognised. If the LPD deterioration subsequently reduces and falls below the threshold, the client is transferred back to stage 1. A specific threshold is calculated based on a statistical method. For Corporate loans, the LPD deterioration threshold that triggered transfers to stage 2 as at 31 December 2024 is 1.3x-5.8x. A range is provided, as each product class uses multiple ECL models and thresholds are determined for each ECL model.

### Qualitative stage triggers

The bank transfers a financial instrument from stage 1 to stage 2 if the instrument meets any one of the following qualitative triggers:

- Forborne status of a borrower;

- Watch status of a borrower. AACB assigns the watch status to counterparties with an increased credit risk. This process comprises intensive monitoring, early detection of deterioration in the credit portfolio and appropriate follow up measures;
- A delinquency-based regulatory backstop is in place, such that the credit risk of financial assets that are more than 30 days past due will be assumed to have significantly increased.

### Reclassification to stage 1

As a general rule, favourable changes in credit risk are recognised consistently with unfavourable changes, and a financial instrument is transferred back to stage 1 if quantitative or qualitative triggers are no longer met. In some cases, a probation period applies:

- Forborne financial instruments are transferred back from stage 2 to stage 1 only after a probation period of at least two years has ended, in line with the ABN AMRO forbearance policy. Stage 3 forborne instruments transfer back to stage 2 after a cure period of at least one year.
- For financial instruments that are 30 days past due, a three-month probation period is applied for transfers from stage 2 to stage 1.

### Classification in stage 3

A transfer to stage 3 will always be the result of the default of a financial instrument. The definition of

default for IFRS 9 is aligned with the regulatory capital definition. A default is deemed to have occurred when:

- the counterparty is past due by more than 90 days on any material financial credit obligation to the bank, or
- the bank considers the borrower to be unlikely to meet its contractual obligations (unlikely to pay, or UTP).

The materiality of a financial obligation past due is assessed against an absolute and a relative threshold, in line with regulatory standards. To determine unlikelihood to pay, the bank has specified both mandatory default triggers (always resulting in the assignment of a default status, whereby no additional expert judgement is allowed) and judgemental triggers (requiring an assessment by credit risk managers to determine whether the UTP indications should result in a default classification).

The mandatory triggers include the reporting of a forbore exposure under probation as non-performing for being 30 days past due or owing to an additional forbearance measure being applied. As a result, the definitions of non-performing and default are materially aligned.

### Reclassification to stage 2

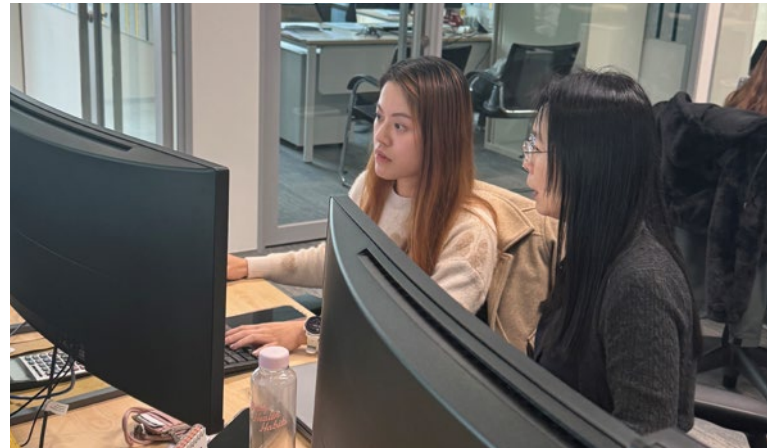
The default classification for non-forborne exposures ends when the default triggers no longer apply and a probation or cure period of at least three months has passed since the default trigger was last applied. For forbore exposures, a twelve-month cure period starts from the moment the last forbearance measure or default trigger was applied. After the cure period, an assessment is performed to establish whether the improvement in the credit quality is factual and permanent (including, for example, no remaining past due amounts).

### Calculation method

AACB recognises loss allowances based on the Expected Credit Loss model (ECL) of IFRS 9, which is designed to be forward-looking. The amount of ECL is based on the probability-weighted present value of all expected cash shortfalls over the remaining life of the financial instrument for both on- and off-balance sheet exposures.

AACB distinguishes between two types of calculation methods for credit loss allowances:

- Individual Lifetime expected credit loss (LECL) for credit-impaired (stage 3) financial. If significant doubts arise regarding a client's ability to meet its contractual obligations and/or one of the default triggers is met.
- 12-month ECL (stage 1) and LECL (stage 2 and 3)



financial instruments are individually assessed for impairment losses. AACB has models to quantify the Probability of Loss (PL), Loss Given Loss (LGL) and Exposure at Loss (EAL) for calculating the individual 12-month ECL and LECL for these financial instruments. The stage is determined per individual financial instrument. Due to the short term and nature of the exposures and the collateralized business model, a credit loss allowance is only calculated on the exposure related to Nostro accounts and debt securities at fair value through OCI and the 12M ECL and LECL are assumed to be equal. For these ECL calculations AACB uses the policies and models of AAB.

### Lifetime expected credit loss

AACB defines the lifetime of credit as the maximum contractual period during which the bank is exposed to credit risk; we do not apply a longer period, even if that longer period is consistent with business practice. For some contracts, such as overdraft facilities or credit cards, no end date is specified or amounts can be contractually withdrawn by the lender at short notice. In these cases, AACB uses behavioural maturity models that rely on historical client behaviour to determine future expected exposures.

### Forward-looking information

For expected credit loss calculations, AACB uses three different scenarios of future economic developments: a baseline (or most likely) scenario, a negative scenario and a positive scenario. The three scenarios are incorporated into the expected credit loss calculation and risk stage determination in a probability-weighted manner. In order to incorporate the latest economic outlook, the scenarios and their weights are reviewed each quarter and adjusted if necessary.

The baseline scenario entails our Group Economics analysts' current macroeconomic base scenario, which usually covers the current year and subsequent year. For the purpose of scenario analysis under IFRS 9, this baseline is extended by three or four additional calendar years, after which it is assumed that



macroeconomic variables (MEVs) gradually move to their potential or equilibrium values. At least once every quarter, Group Economics compares its forecasts with those of institutions like the Netherlands Bureau for Economic Policy Analysis (CPB), the Dutch central bank (DNB), the European Central Bank (ECB), International Monetary Fund (IMF) or the Organisation for Economic Co-operation and Development (OECD), in order to determine possible differences and to analyse whether it can underpin them. This external benchmarking exercise is a standard input to the Scenario Booklet that is presented to the bank's Scenario and Stress Testing Committee for approval. Group Economics also develops a negative and a positive scenario. These scenarios are designed to give an impression of the bandwidth within which the economy, interest and FX rates, and other relevant variables are likely to move in the next four to five years, with a probability of around 85% (roughly corresponding to a standard deviation of plus and minus one and a half). Hence, these scenarios produce upper and lower boundaries, with a resulting bandwidth between the outcomes of the negative ('bad weather' in terms of financial results of the bank) and positive ('good weather') scenarios. To determine these boundaries, Group Economics may look at historical developments, medium-term (non-baseline) scenarios made by the above institutions, and other relevant developments.

## Management overlays and other adjustments

Where necessary to reflect the credit risk dynamics not captured by our models, management judgement is applied via a management overlay or other IFRS 9 adjustment. A management overlay is a temporary adjustment in a loss allowance until a long-term solution (e.g. model adjustment) is effective and must be an amount commensurate to the model limitation. All overlays require a decision of the Impairment and Provision Committee (IPC). The main types of management overlays that AACB distinguishes are: post-model adjustments (adjustments to model outcomes), adjustments in the weightings of macroeconomic scenarios and stage overrides. Other adjustments such as adjustments to model parameters or input data are not considered management overlays but follow the same internal approval process.

## Climate and environmental risks in ECL

In this developing discipline we are working to incorporate CER risk explicitly into ECL models. Following our roadmap, we are taking steps to gain deeper insight into how climate and environmental risks affect our clients, and to eventually embed them into our IFRS 9 ECL models.

Although the impact of climate risk on ECL can only be estimated with a high degree of uncertainty regarding amounts of losses and the time horizon on which it will materialise, it is partially embedded into our ECL estimates through our macroeconomic forecasts. Climate scenarios are included in Group Economics' baseline, positive and negative macroeconomic scenarios. These are underpinned by and compared to public and non-public climate scenarios such as those of the Network for Greening of Financial Services (NGFS). To capture climate and environmental risks in ECL and related scenario processes, each macroeconomic scenario is accompanied by an overview that illustrates which of these risks are included in the various projected macroeconomic indicators.

For identifiable events with no or insufficient provisioning, ECL-related management overlays can be taken. Given the combination of macroeconomic scenarios and these management overlays, we consider the bank adequately provisioned for climate and environmental risks.

## Cured financial assets

When a credit impaired financial asset cures, the interest that was previously unrecognised is reported as an impairment release in the impairment charge rather than as a credit to the interest income calculated using the effective interest method.

## Write-off

Under IFRS 9, 'write-off' refers to the process of recognising that a financial asset, or a portion of it, is uncollectible and should be removed from an entity's balance sheet. This typically happens when there is no reasonable expectation of recovering the asset, indicating that the entity has exhausted all practical recovery efforts.

Such loans are written off after all the necessary procedures have been completed and the amount of the loss has been determined. Subsequent recoveries of amounts previously written off are credited to impairment charges on loans and advances in the income statement.



## Client clearing

As a general clearing member, AACB provides clearing and settlement services to its clients for, among other things, exchange-traded derivatives.

In its capacity as a clearing member, AACB guarantees the fulfilment of obligations towards central counterparty clearing houses (CCPs) of clients' transactions. AACB is not liable to clients for the non-performance of the CCP. In the event of a client defaulting, AACB has the legal obligation to settle all the client's positions with the relevant CCPs, possibly at a loss. Possible losses arising from this guarantee might relate not only to a client's current positions, but also to the client's future trades. AACB receives and collects (cash) margins from clients and remits these margins to the relevant CCP in whole or in part. Given the stringent margin requirements set by the CCPs, possible future outflows of resources for new clearing transactions are considered close to zero.

AACB does not reflect the exchange-traded derivatives cleared on behalf of clients in its financial statements. Under normal circumstances, the guarantee has no fair value and is not recognised in the financial statements. Any loss recognised in the event of non-performance of a client is in line with our contingent liabilities policy.

## Offsetting

The bank offsets financial assets and liabilities and the net amount reported in the statement of financial position if it is legally entitled to set off the recognised amounts and intends to settle on a net basis, or to realise the asset and settle the liability simultaneously.

## Statement of cash flows

For the purposes of the statement of cash flows, cash and cash equivalents comprise cash in hand, freely available balances with central banks and other banks, and net balances on current accounts with other banks with a maturity of less than three months from the date of acquisition. The statement of cash flows, based on the indirect method of calculating operating cash flows, gives details of the source of cash and cash equivalents which became available during the year and the application of these cash and cash equivalents over the course of the year. The cash flows are categorised into cash flows from operations, including banking activities, investment activities and financing activities. Movements in loans and advances and interbank deposits are included in the cash flow from operating activities. Investment activities are comprised of acquisitions, sales and redemptions in respect of financial investments, as well as investments in, and sales of, subsidiaries and associates, property and equipment. The issuing of shares and the borrowing and repayment of long-term funds are treated as financing activities. Cash flows arising from foreign currency transactions are translated into euros using the exchange rates at the date of the cash flows.

## Levies and other regulatory charges

AACB recognises a liability arising from levies and similar charges when it becomes legally enforceable (i.e. when the obligating event arises).



## Overview of financial assets and liabilities by measurement base

(x EUR 1.000)

31 December 2024

	Amortised cost	Fair value through profit or loss - trading	Fair value through profit or loss - other	Fair value through other comprehensive income	Total
<b>Financial Assets</b>					
Cash and balances at central banks	71,471				71,471
Financial assets held for trading		1,653			1,653
Derivatives		40			40
Financial investments			119,433	428,661	548,094
Securities financing	14,973,707				14,973,707
Loans and advances banks	1,326,943				1,326,943
Corporate loans	8,630,890				8,630,890
Other loans and advances	6,189,793				6,189,793
<b>Total financial assets</b>	<b>31,192,805</b>	<b>1,692</b>	<b>119,433</b>	<b>428,661</b>	<b>31,742,591</b>
<b>Financial Liabilities</b>					
Financial liabilities held for trading		114			114
Derivatives		100			100
Securities financing	3,465,336				3,465,336
Due to banks	15,245,658				15,245,658
Due to customers	9,440,204				9,440,204
Issued debt	802,789				802,789
<b>Total financial liabilities</b>	<b>28,953,987</b>	<b>214</b>			<b>28,954,201</b>

(x EUR 1.000)

31 December 2023

	Amortised cost	Fair value through profit or loss - trading	Fair value through profit or loss - other	Fair value through other comprehensive income	Total
<b>Financial Assets</b>					
Cash and balances at central banks	1,080,629				1,080,629
Financial assets held for trading		804			804
Derivatives		170			170
Financial investments			79,986	537,482	617,468
Securities financing	11,506,442				11,506,442
Loans and advances banks	1,096,269				1,096,269
Corporate loans	8,579,881				8,579,881
Other loans and advances	6,043,655				6,043,655
<b>Total financial assets</b>	<b>28,306,876</b>	<b>974</b>	<b>79,986</b>	<b>537,482</b>	<b>28,925,318</b>
<b>Financial Liabilities</b>					
Financial liabilities held for trading		7,039			7,039
Derivatives		118			118
Securities financing	2,416,112				2,416,112
Due to banks	14,313,463				14,313,463
Due to customers	9,428,628				9,428,628
Issued debt	600,000				600,000
<b>Total financial liabilities</b>	<b>26,758,204</b>	<b>7,157</b>			<b>26,765,361</b>



## Notes to the consolidated income statement

### 2. Net fee and commission income

#### Accounting policy for net interest income and interest expense

Interest income and expenses is recognised in the income statement on an accrual basis for financial instruments using the effective interest rate method, except for those financial instruments measured at fair value through profit or loss. The effective interest rate method allocates interest, amortisation of any discount or premium, or other differences including transaction costs and qualifying fees and commissions over the expected lives of the assets and liabilities. The effective interest rate is the rate that exactly discounts estimated future cash flows to the net carrying amount of the asset.

Interest paid on assets with a negative interest yield is classified as interest expense. Interest received from liabilities with a negative interest yield is classified as interest income.

The interest income is a result of current account balances, (exchange) margins and securities financing.

This item includes interest income and interest expense from banks and customers.

(x EUR 1.000)	2024	2023
<b>Interest Income</b>		
<b>Of the interest income items the following amounts were related to:</b>		
Interest income from ABN AMRO group companies	77,488	71,392
Interest income from third party customers/banks	1,956,572	1,581,085
<b>Total interest income</b>	<b>2,034,060</b>	<b>1,652,477</b>

The interest income of 2024 includes an amount of EUR 12.83 million (2023: EUR12.69 million) concerning financial instruments that are at fair value through other comprehensive income. The remaining EUR 2,021 million (2023: EUR 1,639 million) relates to financial instruments carried at amortised cost. No interest income amounts relate to financial instruments measured at fair value through profit or loss.

(x EUR 1.000)	2024	2023
<b>Interest Expense</b>		
<b>Of the interest expense items the following amounts were related to:</b>		
Interest expense to ABN AMRO group companies	1,010,978	808,423
Interest expense to third party customers/banks	674,941	538,311
<b>Total interest expense</b>	<b>1,685,919</b>	<b>1,346,734</b>

All interest expense amounts in 2024 and 2023, relate to financial instruments carried at amortised cost. No interest expense amounts relate to financial instruments measured at fair value through profit or loss.

<b>Net interest income</b>	<b>348,141</b>	<b>305,743</b>
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### 3. Net fee and commission income

#### Accounting policy for net fee and commission income

AACB applies IFRS 15 when recognising revenue from contracts with customers, all of which is included in net fee and commission income. After identifying contracts and their performance obligations, revenue is recognised as an amount that reflects the consideration to which the bank expects to be entitled in exchange for transferring promised services to customers. The transaction price is allocated to each performance obligation. Revenue is measured at the fair value of the consideration received, taking into account discounts and rebates. The amount of revenue recognised is discounted to the present value of consideration due, if payment extends beyond normal credit terms.

Revenue is recognised when a promised service is transferred to the customer. Fees and commissions are recognised at a point in time: the fee is a reward for a service provided at a moment in time.

(x EUR 1.000)	2024	2023
Fee and commission income	511,450	457,087
Fee and commission expense	124,578	110,431
<b>Net fee and commission income</b>	<b>386,872</b>	<b>346,656</b>

**Fee and Commission Income**

(x EUR 1.000)

**2024****2023****Fee and commission income from:**

Payment services	1,105	925
Securities and derivatives	510,070	454,596
Other fees and commissions	275	1,566
<b>Total fee and commission income</b>	<b>511,450</b>	<b>457,087</b>

**Of the fee and commission income item, the following amounts were with:**

ABN AMRO group companies	255	1,012
Third party customers/banks	511,195	456,075
<b>Total fee and commission income</b>	<b>511,450</b>	<b>457,087</b>

All fee and commission income amounts in 2024 and 2023 relate to financial instruments carried at amortised cost and fair value through profit or loss.

**Fee and Commission Expense**

(x EUR 1.000)

**2024****2023****The components of fee and commission expense are:**

Payment services	7,879	6,596
Securities and derivatives	116,948	101,963
Other fees and commissions	-249	1,872
<b>Total fee and commission expense</b>	<b>124,578</b>	<b>110,431</b>

**Of the fees and commission expense item, the following amounts were with:**

ABN AMRO group companies	1,163	1,075
Third party customers/banks	123,415	109,356
<b>Total net fee and commission expense</b>	<b>124,578</b>	<b>110,431</b>

All fee and commission expense amounts in 2024 and 2023 relate to financial instruments carried at amortised cost and fair value through profit or loss.

**4. Net trading income****Accounting policy for net trading income**

In accordance with IFRS 9, trading positions are held at fair value, and net trading income includes gains and losses arising from changes in the fair value of such financial assets and liabilities. The latter comprises gains and losses from trading financial assets and liabilities, interest income and expenses related to trading financial assets and liabilities, and dividends received from trading instruments.

(x EUR 1.000)

**2024****2023**

<b>Foreign exchange trading</b>	<b>28,527</b>	<b>-11,023*</b>
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\* Due to the addition of a separate note on net trading income an amount of -11,023 thousand in 2023 has been reclassified from other income.

**5. Share of result in equity accounted investments**

(x EUR 1.000)

**2024****2023**

<b>Total realised result on equity accounted investments</b>	<b>-1</b>	<b>-5</b>
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Refer to note 22 for more information on the equity accounted investments.

## 6. Other operating income

### Accounting policy for other operating income

Other operating income includes all other activities such as, foreign exchange transaction result, market access services and results on disposal of assets. It also includes the fair value changes relating to assets and liabilities measured at fair value through profit or loss.

(x EUR 1.000)	2024	2023
Foreign exchange transaction result	-30,252	-16
Dividend	4,108	3,293
Realised gain on financial transactions	28,206	12,513
Other	3,524	2,718
<b>Total other operating income</b>	<b>5,586</b>	<b>18,509*</b>

\* Due to the addition of a separate note on net trading income an amount of -11,023 thousand in 2023 has been reclassified from other income to net trading income.

## 7. Personnel expenses

### Accounting policy for personnel expenses

Salaries and wages, social security charges and other salary-related costs are recognised over the period in which the employees provide the services to which the payments relate.

### Defined contribution plans

For defined contribution plans, AACB pays annual contributions that have been determined by a fixed method and has no legal or constructive obligation to pay any further contributions. Contributions are recognised directly in the income statement in the year to which they relate. Actuarial and investment risk are for the account of the participants in the plan.

(x EUR 1.000)	2024	2023
<b>Personnel expenses are specified as follows:</b>		
Salaries and wages	142,449	124,000
Social security charges	16,171	13,149
Pension expenses	17,227	14,514
Other	9,033	9,318
<b>Total personnel expenses</b>	<b>184,880</b>	<b>160,981</b>

On a monthly basis the personnel expenses (including pension costs), concerning the employees of the Netherlands, are accrued and aligned with ABN AMRO. On a quarterly basis the payable amounts are settled. In 2024 ABN AMRO charged 76.4 million for employees working in the Netherlands (2023: EUR 67.6 million)

The pension expenses are mainly related to the defined contribution plans of the subsidiaries. Contributions are paid annually and determined by a fixed method. AACB has no legal or constructive obligation to pay any further contributions. Contributions are recognised directly in the income statement in the year to which they relate. Actuarial and investment risk are for the account of the participants of the plan.

The Dutch defined contribution plan is a Collective Defined Contribution (CDC) plan, based on an average salary plan. The normal retirement age is set at 68 years. The contribution payable by pension fund participants is 5.5% (2023: 5.5%).

The other category consist of restructuring provision expenses, commuting expenses, dismissal payments, insurance and other short term employee benefits.

For the disclosure of the remuneration of the Management and Supervisory Board Members, refer to the note 35 on related parties.

(x EUR 1.000)	2024	2023
<b>The average number of FTEs:</b>		
Netherlands*	506	464
United Kingdom	97	91
Germany*	11	10
Singapore	82	74
Japan	30	26
Australia	74	68



Hong Kong	36	33
United States	243	219
Brazil	29	27
Romania	1	
<b>Total</b>	<b>1,109</b>	<b>1,011</b>

\* These employees have a contract with AAB with the respective expenses being charged by AAB to AACB.

## 8. General and administrative expenses

### Accounting policy general and administrative expenses

General and administrative expenses are recognised in the period in which the services were provided and to which the payment relates.

### Banking tax

In 2012 the Dutch government introduced a banking tax that becomes payable on 1 October of every year. Banking tax is a levy that is charged to the income statement at the moment it becomes payable. AACB is liable for the tax, however the payment is made by AAB and charged to AACB.

(x EUR 1.000)	2024	2023
<b>General and administrative expenses can be broken down as follows:</b>		
Information technology costs	71,188	70,959
Agency staff, contractors and consultancy costs	51,946	50,279
Recharges from ABN AMRO group companies	9,260	24,551
Dutch banking tax	20,798	17,856
Staff related costs	6,113	4,450
Financial statement audit fees	1,764	1,848
Housing	1,485	1,662
Post, telephone and transport	1,240	1,271
Marketing and public relations costs	957	699
Audit related fees	310	449
Other	10,635	21,213
<b>Total general and administrative expenses</b>	<b>175,696</b>	<b>195,240</b>

Audit related fees consists of fees paid for the audit of financial statements and other assurance engagements. No non-assurance services were provided to AACB by their auditors in 2024 and 2023.

## 9. Depreciation and amortisation of (in)tangible assets

The accounting policy for depreciation and amortisation is described in notes 23 and 24.

This item refers to the depreciation and amortisation of equipment and software.

(x EUR 1.000)	2024	2023
Leasehold improvements – depreciation	726	603
Equipment – depreciation	215	141
IT equipment – depreciation	1,732	688
Purchased software - amortisation	350	336
Internal software - amortisation	964	874
Right of use assets - depreciation	3,979	3,902
<b>Depreciation and amortisation expenses</b>	<b>7,966</b>	<b>6,544</b>
IT equipment – depreciation rebilled by ABN AMRO group	808	364
Purchased software - amortisation rebilled by ABN AMRO group	1,216	160
Internal software - amortisation rebilled by ABN AMRO group	1,611	516
Right of use assets - depreciation rebilled by ABN AMRO group	92	156
<b>Total depreciation and amortisation expenses</b>	<b>11,693</b>	<b>7,740</b>

## 10. Impairment charges on financial instruments le assets

For details on the impairments, refer to the loans and advances from banks and customers items in the balance sheet, notes 18 and 19.

(x EUR 1.000)

	2024	2023
Stage 1 - twelve month expected credit loss	1,258	-2,367
Stage 2 - lifetime expected credit loss		
Stage 3 - lifetime expected credit loss	275	-808
<b>Total impairment charges on financial instruments</b>	<b>1,533</b>	<b>-3,175</b>

## 11. Income tax expenses

### Accounting policy for Income tax expenses, tax assets and tax liabilities

AACB is subject to income taxes in numerous jurisdictions. Income tax expense consists of current and deferred tax. Income tax is recognised in the income statement in the period in which profits arise, except to the extent that it arises from a transaction that is recognised directly in equity.

The Dutch operations of AACB form part of a fiscal unity with AAB for corporate income tax purposes. As a consequence AACB receives a tax allocation from the head of the fiscal unity who pays the tax. Such fiscal unity is also in place for value added tax. Abroad, the local operations form part of a tax grouping when possible under local legislation. Otherwise, it is seen as a separate taxpaying entity. If the entity is part of a fiscal unity the tax is calculated as if it was a separate taxpaying entity.

Due to the fiscal unity, the tax on Dutch deductible losses will be recognised in the income statement as far as the total AAB result is a profit.

(x EUR 1.000)

	2024	2023
<b>The details of the current and deferred income tax expense are presented below:</b>		
Current tax	68,317	64,818
Deferred tax	42,999	3,026
<b>Total income tax expenses</b>	<b>111,316</b>	<b>67,845</b>

The table below shows a reconciliation between the expected income tax expense and the actual income tax expense. The expected income tax expense has been calculated by multiplying the profit before tax to the weighted average rate from branches and subsidiaries.

Profit before taxation	395,324	299,093
Weighted applicable tax rate	27.37%	26.12%
<b>Expected income tax expense</b>	<b>108,206</b>	<b>78,135</b>
<b>Change in taxes resulting from:</b>		
Tax exemptions	1,125	-9,236
Tax loss utilization	-28,377*	532
Adjustments for tax of prior periods	-2,719	2,525
Change in tax rate	-224	-1,382
Loss carry forwards	34,894*	-1,355
Other	-1,588	-1,373
Actual income tax expenses	111,317	67,846
<b>Total</b>	<b>1,109</b>	<b>1,011</b>

### Effective tax rate

28.16%

22.68%

See also tax note 25 in the notes to the consolidated statement of financial position.

\* The loss carry forwards were acquired as part of the common control transaction of the US entities. Part of the deferred tax asset is utilized during 2024 and a recalibration of the remaining amount took place, resulting in a loss carry forward adjustment.

### Country by Country reporting 2024

The following table provides an overview of total operating income, average number of FTEs and net profit/(loss) for the year per country.

Country	Principal subsidiary	Total Operating Income	Average number of FTEs	Profit/(loss) before taxation	Income tax expense	Profit (loss) for the year
		(x EUR 1.000)		(x EUR 1.000)	(x EUR 1.000)	(x EUR 1.000)
Netherlands	ABN AMRO Clearing Bank N.V.	294,392	506	41,129	16,238	24,950
- international activities						
Great Britain	ABN AMRO Clearing Bank London Branch	19,891	97	23,515	5,300	18,215
United States	ABN AMRO Clearing USA LLC	259,662	243	181,213	67,865	113,348
Singapore	ABN AMRO Clearing Bank Singapore Branch	75,612	82	67,695	10,076	57,618
Japan	ABN AMRO Clearing Tokyo Co Ltd	21,861	30	8,596	2,596	6,000
Hong Kong	ABN AMRO Clearing Hong Kong Ltd	69,877	36	58,118	3,939	54,179
Australia	ABN AMRO Clearing Sydney Pty Ltd	14,560	74	2,791	1,234	1,557
Brazil	Banco ABN AMRO Clearing S.A.	13,276	29	12,199	4,065	8,134
Romania	ABN AMRO Clearing IT Services Romania S.R.L.	-1	1	7	2	5
Other			11			
<b>Total</b>		<b>769,130</b>	<b>1,109</b>	<b>395,263</b>	<b>111,315</b>	<b>284,006</b>

### Country by Country reporting 2023

The following table provides an overview of total operating income, average number of FTE's and net profit/(loss) for the year per country.

Country	Principal subsidiary	Total Operating Income	Average number of FTEs	Profit/(loss) before taxation	Income tax expense	Profit (loss) for the year
		(x EUR 1.000)		(x EUR 1.000)	(x EUR 1.000)	(x EUR 1.000)
Netherlands	ABN AMRO Clearing Bank N.V.	279,007	464	34,128	14,860	19,267
- international activities						
Great Britain	ABN AMRO Clearing Bank London Branch	7,435	91	10,875	2,075	8,800
United States	ABN AMRO Clearing USA LLC	199,856	219	130,812	34,110	96,702
Singapore	ABN AMRO Clearing Bank Singapore Branch	57,518	74	41,387	5,980	35,407
Japan	ABN AMRO Clearing Tokyo Co Ltd	18,461	26	6,835	1,988	4,847
Hong Kong	ABN AMRO Clearing Hong Kong Ltd	66,883	33	55,320	2,991	52,329
Australia	ABN AMRO Clearing Sydney Pty Ltd	15,569	68	4,817	1,478	3,339
Brazil	Banco ABN AMRO S.A.	15,150	27	14,921	4,362	10,559
Other			10			
<b>Total</b>		<b>659,879</b>	<b>1,011</b>	<b>299,095</b>	<b>67,844</b>	<b>231,250</b>



## Notes to the consolidated statement of financial position

### 12. Cash and balances at central banks

#### Accounting policy for cash and balances at central banks

Cash and balances at central banks are held at amortised cost. This item includes cash on hand and available demand balances with central banks. Mandatory reserve deposits are disclosed in note 18, loans and advances - banks.

All cash and cash equivalents are available for use in AACB's day-to-day operations.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>Total cash and balances at central banks</b>	<b>71,471</b>	<b>1,080,629</b>

### 13. Financial assets held for trading

#### Accounting policy for financial assets held for trading

In accordance with IFRS 9, all assets held for trading are held at fair value through profit or loss, with gains and losses in the changes of the fair value taken to 'net trading income' in the income statement.

#### Financial assets held for trading

The following table shows the composition of assets held for trading.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>The trading assets consists of the following financial instruments:</b>		
Equity instruments held for trading*	1,653	804
<b>Total financial assets held for trading</b>	<b>1,653</b>	<b>804</b>

\* These shares are held in connection with portfolio swaps.

#### Financial liabilities held for trading

The following table shows the composition of liabilities held for trading.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>The financial liabilities held for trading consist of the following:</b>		
Equity instruments held for trading*	114	7,039
<b>Total financial liabilities held for trading</b>	<b>114</b>	<b>7,039</b>

\* These shares are held in connection with portfolio swaps.

### 14. Derivatives

#### Accounting policy for derivatives

Derivatives comprise portfolio swaps and foreign exchange contracts, which are derivatives held for trading. Portfolio swaps are swap agreements in which one party makes payments based on a reference rate, while the other party makes payments based on the return of an portfolio of underlying assets.

#### Derivative assets

The following table shows the composition of derivative assets.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>The table below shows the components of derivatives:</b>		
FX contracts	40	169
Portfolio swaps		1
<b>Total derivatives assets</b>	<b>40</b>	<b>170</b>

#### Derivative liabilities

The following table shows the composition of derivative liabilities.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>The table below shows the components of derivatives:</b>		
FX contracts	64	91
Portfolio swaps	36	27
<b>Total derivatives liabilities</b>	<b>100</b>	<b>118</b>

## 15. Financial investments

### Accounting policy for financial investments

Financial investments include instruments measured at fair value through other comprehensive income (FVOCI) and instruments measured at fair value through profit or loss (FVTPL).

Accounting policy for instruments at fair value through other comprehensive income

Unrealised gains and losses of FVOCI assets are recognised directly in other comprehensive income, net of applicable taxes. Interest earned, premiums, discounts and qualifying transaction costs of interest earning FVOCI debt instruments are amortised to income on an effective interest rate basis. When FVOCI debt instruments are sold, the cumulative gain or loss recognised in other comprehensive income is transferred to other operating income in the income statement. Fair value changes of equity instruments which are irrevocably designated at FVOCI upon initial recognition are recognised in other comprehensive income and not subsequently reclassified to the income statement. The impairment loss resulting from the ECL on FVOCI debt instruments is recognised in the impairment charges on financial instruments in the income statement. The related loss allowance is recognised in other comprehensive income and does not reduce the carrying amount of the FVOCI debt instruments.

### Accounting policy for instruments at fair value through profit and loss

Financial investments at fair value through profit or loss are either designated upon initial recognition or are mandatorily required to be measured at fair value applying IFRS 9. Financial investments managed on a fair value through profit or loss basis are at initial recognition designated at fair value through profit or loss when the instruments:

- are held to reduce an accounting mismatch; or
- are managed on the basis of its fair value.

See also Note 16 for the accounting policy relating to the fair value of financial instruments for more information about the measurement of financial investments.

(x EUR 1.000)	2024	2023
<b>Debt securities held at fair value through other comprehensive income</b>	428,661	537,482
Held at fair value through profit or loss	119,433	79,986
<b>Total financial investments</b>	<b>548,094</b>	<b>617,468</b>

(x EUR 1.000)	2024	2023
Profit before taxation	395,324	299,093
Weighted applicable tax rate	27.37%	26.12%
<b>Expected income tax expense</b>	<b>108,206</b>	<b>78,135</b>

(x EUR 1.000)	2024	2023
<b>Movements in the financial investments were as follows:</b>		
<b>Opening balance as at 1 January</b>	<b>617,468</b>	<b>788,784</b>
Sales to third parties	-147,202	-250,056
Additions	43,548	81,978
Gross revaluation to equity	53	23
Gross revaluation to income	32,123	15,806
Dividends received	-4,039	-3,337
Exchange rate differences	6,143	-15,729
<b>Closing balance as at 31 December</b>	<b>548,094</b>	<b>617,468</b>

(x EUR 1.000)	2024	2023
<b>Interest-earning securities:</b>		
United States	258,363	387,555
European Union	70,330	68,279
Brazil	99,968	81,648
<b>Subtotal</b>	<b>428,661</b>	<b>537,482</b>
Equity instruments	119,433	79,986
<b>Closing balance as at 31 December</b>	<b>548,094</b>	<b>617,468</b>

**An analysis of changes in the carrying amount in relation to Debt securities measured as FVOCI is as follows:**

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2024	537,482			537,482
Change in carrying amount due to purchase	35,283			35,283
Change in carrying amount due to repayment	-147,202			-147,202
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Unrealised gains and losses	53			53
Foreign exchange adjustments	3,046			3,046
<b>At 31 December 2024</b>	<b>428,661</b>			<b>428,661</b>

During the year, there were no transfers from Stage 1. The ECL for 2024 is nil.

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2023	724,252			724,252
Change in carrying amount due to purchase	77,828			77,828
Change in carrying amount due to repayment	-250,056			-250,056
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Unrealised gains and losses	23			23
Foreign exchange adjustments	-14,564			-14,564
<b>At 31 December 2023</b>	<b>537,482</b>			<b>537,482</b>

During the year, there were no transfers from Stage 1. The ECL for 2023 is nil.

**16. Fair value of financial instruments carried at fair value**

The classification of financial instruments is determined in accordance with the accounting policies set out in note 13 financial assets and liabilities held for trading and note 15 financial investments.

**Accounting policy for fair value of financial instruments**

Fair value is defined as the price that would be received when selling an asset or paid when transferring a liability in an orderly transaction between market participants at the measurement date. To determine a reliable fair value, where appropriate, management applies valuation adjustments to the pricing information from the following sources:

**Level 1:** the unadjusted quoted market price for financial instruments that are actively traded.

**Level 2:** based primarily on observable market data. Valued using a recent market transaction or a variety of valuation techniques referring to a similar instrument for which market prices do exist.

**Level 3:** using a valuation technique where at least one input, which has a significant effect on the instrument's valuation, is not based on observable market data. A significant effect on the instrument's valuation is considered to be present when the unobservable input accounts for at least 10% of the total instrument's fair value.

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

We believe our estimates of the fair values are adequate. However, the use of different models or assumptions could result in changes to our reported results.

AACB analyses financial instruments held at fair value into the three categories as describe above. The level 3 instruments have been valued using a valuation technique where at least one input, which could have a significant effect on the instrument's valuation, is not based on observable market data.



### Valuation techniques

A number of methodologies are used to determine the fair value of financial instruments for which observable prices in active markets for identical instruments are not available. Values between and beyond available data points are obtained by interpolation and/or extrapolation. When using valuation techniques, the fair value can be significantly impacted by the choice of valuation model and underlying assumptions made concerning factors such as the amount and timing of cash flows, discount rates and credit risk.

### Derivatives

This category includes interest rate swaps, cross currency swaps, options and forward rate agreements. These products are valued by estimating future cash flows and discounting those cash flows using appropriate interest rate curves. Except for interest option contracts which are valued using market standard option pricing models. The inputs for the discounting cash flow models are principally observable benchmark interest rates in active markets such as the interbank rates and quoted interest rates in the swap, bond and futures markets. The inputs for credit spreads – where available – are derived from prices of credit default swaps or other credit-based instruments, such as debt securities. For others, credit spreads are obtained from pricing services. The additional inputs for the option pricing models are price volatilities and correlations which are obtained from broker quotations, pricing services or derived from option prices. Because of the observability of the inputs used in the valuation models, the majority of the interest rate derivative contracts are classified as Level 2. If adjustments to interest rate curves, credit spreads, correlations or volatilities are based on significant unobservable inputs, the contracts are classified as Level 3. Exchange traded options and futures are valued using quoted market prices and hence classified as Level 1.

### Government debt securities

Government debt securities, reported under Financial investments consist of government bonds and bills with both fixed or floating rate interest payments issued by sovereign governments. These instruments are traded in active markets and prices can be derived directly from those markets. Therefore the instruments are classified as level 1.

### Equity instruments

Equity instruments related to the Synthetics product offering are reported as Financial assets held for trading. The equity instruments which are related to ownership in other companies are reported under financial investments. Equity securities that are actively traded on public stock exchanges are valued using the readily available quoted prices and therefore classified as Level 1. For equity instruments that are not actively traded a valuation model is used and are classified as Level 3. For the valuation model an assessment is made to what extent the observable input can be maximized and unobservable input minimized. The model is mainly based on dividend growth model and where applicable the latest transaction price.

AACB refines and modifies its valuation techniques as markets and products develop and as the pricing for individual product becomes more or less readily available. While AACB believes its valuation techniques are appropriate and consistent with other market participants, the use of different methodologies or assumptions could result in different estimates of the fair value at the reporting date.

The following table presents the carrying value of the financial instruments held and or disclosed at fair value across the three levels of the fair value hierarchy.

(x EUR 1.000)

	Level 1 - Quoted prices in active market	Level 2 - Valuation technique observable market data	Level 3 - Valuation technique unobservable market data	Total
<b>At 31 December 2024</b>				
Financial assets held for trading	1,653			1,653
Derivatives	40			40
Financial investments	490,915		57,180	548,094
<b>Total financial assets</b>	<b>492,607</b>		<b>57,180</b>	<b>549,787</b>
Financial liabilities held for trading	114			114
Derivatives	64	36		100
<b>Total financial liabilities</b>	<b>178</b>	<b>36</b>		<b>214</b>

(x EUR 1.000)

At 31 December 2023	Level 1 - Quoted prices in active market	Level 2 - Valuation technique observable market data	Level 3 - Valuation technique unobservable market data	Total
Financial assets held for trading	804			804
Derivatives	169	1		170
Financial investments	583,547		33,920	617,468
<b>Total financial assets</b>	<b>584,520</b>		<b>33,920</b>	<b>618,442</b>
Financial liabilities held for trading	7,039	-	-	7,039
Derivatives	91	27		118
<b>Total financial liabilities</b>	<b>7,130</b>	<b>27</b>		<b>7,157</b>

**Level 3 sensitivity information**

Within financial investments AACB owns shares of exchanges and strategical investments. These shares are classified in the table above as Level 3; Valuation technique utilizes unobservable market data. The valuation price is based on a valuation model containing multiple of valuation techniques, based on the latest available transaction price and the dividend growth model. The dividend growth model is a valuation model that calculates the fair value of stock, assuming that the dividends grow either at a stable rate in perpetuity or at a different rate during the period at hand. AACB makes assumptions in determining fair value and to perform sensitivity testing. These are assumptions regarding sustainable growth rate, return on equity and liquidity discount rate. Performing a sensitivity analysis as a possible alternative assumption of 10% of the fair value results in a fair value deviation of minimum -5.7 million to maximum +5.7 million.

**Transfers between levels 1 and 2**

There were no material transfers between levels 1 and 2.

**Transfers from levels 1 and 2 into 3**

There were no material transfers from levels 1 and 2 into 3.

**Movements in level 3 financial instruments measured at fair value**

The following table shows a reconciliation of the opening and closing amounts of level 3 financial assets that are recorded at fair value.

(x EUR 1.000)

**Financial investments**

<b>Balance at 1 January 2023</b>	<b>24,327</b>
Purchases	4,741
Dividends	-3,266
Gains/(losses) recorded in profit and loss	8,917
Unrealised gains/(losses)	92
Other movements	-890
<b>Balance at 31 December 2023</b>	<b>33,920</b>
Purchases	1,934
Dividends	-3,790
Gains/(losses) recorded in profit and loss	24,764
Unrealised gains/(losses)	351
Other movements	
<b>Balance at 31 December 2024</b>	<b>57,180</b>

## 17. Securities financing

### Accounting policy for securities financing

Securities financing is measured at amortised cost. Securities financing consists of securities borrowing and lending and sale and repurchase transactions. Securities borrowing and securities lending transactions are generally entered into on a collateralised basis, with securities usually advanced or received as collateral. The transfer of the securities themselves is not reflected in the statement of financial position unless the risks and rewards of ownership are also transferred. If cash is advanced or received, securities borrowing and lending activities are recorded at the amount of cash advanced or received. The market value of the securities borrowed or lent is monitored on a daily basis and the collateral levels are adjusted in accordance with the underlying transactions. Fees and interest received or paid are recognised on an effective interest basis and recorded as interest income or interest expense.

Sale and repurchase transactions involve purchases (or sales) of investments with agreements to resell (or repurchase) substantially identical investments at a certain date in the future at a fixed price. Investments purchased subject to commitments to resell them at future dates are not recognised. The amounts paid are recognised in securities financing and are shown as collateralised by the underlying security.

Investments sold under repurchase agreements continue to be recognised in the statement of financial position. The proceeds from the sale of the investments are reported as liabilities to either banks or customers. The difference between the sale and repurchase price is recognised over the period of the transaction and recorded as interest income or interest expense, using the effective interest method. If borrowed securities are sold to third parties, the proceeds from the sale and a liability for the obligation to return the collateral are recorded at fair value.

The receivables relating to the securities financing refers to the (cash) collateral requirements of counterparties or the cash settlement of the securities transactions. The payables relating to the securities financing refers to the (cash) collateral requirements of counterparties or the cash settlement of the securities transactions.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>Assets</b>		
Reverse repurchase agreements***	5,072,734	2,427,719
Securities borrowing transactions	8,024,923	6,901,934
Transactions related to securities*	1,876,050	2,176,790
<b>Total securities financing</b>	<b>14,973,707</b>	<b>11,506,442</b>
<b>Liabilities</b>		
Repurchase agreements***	2,842,110	-
Securities lending transactions	18,007	185,365
Transactions related to securities**	605,219	2,230,747
<b>Total securities financing</b>	<b>3,465,336</b>	<b>2,416,112</b>

\* These transactions relate to the settlement of the sale of securities under the practice of Delivery versus Payment.

\*\* These transactions relate to the settlement of the purchase of securities under the practice of Delivery versus Payment.

\*\*\* As result of the addition of NY subsidiaries, reverse repurchase agreements increased by 2.6bn and the repurchase agreements increased by 2.8bn.

Of the securities financing the following counterparties were involved:

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>Assets</b>		
ABN AMRO group companies	1,587,609	1,352,505
Banks	4,120,434	4,797,283
Customers	9,265,664	5,356,654
<b>Total securities financing</b>	<b>14,973,707</b>	<b>11,506,442</b>
<b>Liabilities</b>		
ABN AMRO group companies	823,943	-
Banks	261,337	550,140
Customers	2,380,056	1,865,973
<b>Total securities financing</b>	<b>3,465,336</b>	<b>2,416,112</b>



**An analysis of changes in the carrying amount in relation to Securities financing is as follows:**

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2024	11,506,442			11,506,442
Change in carrying amount due to origination and repayment (excluding write offs)	2,935,080			2,935,080
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	532,185			532,185
<b>At 31 December 2024</b>	<b>14,973,707</b>			<b>14,973,707</b>

During the year, there were no transfers from Stage 1. The ECL for 2024 is nil.

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2023	9,008,397			9,008,397
Change in carrying amount due to origination and repayment (excluding write offs)	2,720,494			2,720,494
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	-222,449			-222,449
<b>At 31 December 2023</b>	<b>11,506,442</b>			<b>11,506,442</b>

During the year, there were no transfers from Stage 1. The ECL for 2023 is nil.

**18. Loans and advances banks****The accounting policy for loans and advances**

Under IFRS 9 Financial Instruments, loans and advances from banks and customers are held in a hold to collect business model. Loans and advances of which the contractual cash flows are solely payments of principal and interest (SPPI) are measured at amortised cost, i.e. fair value at initial recognition adjusted for repayment and amortisation of coupon, fees and expenses to represent the effective interest rate of the asset. Loans and advances that do not pass the SPPI test are measured at fair value through profit or loss. For the impairment loss policy, please refer to the accounting policies note.

This item includes all accounts receivable from credit institutions that relate to business operations and own bank accounts and does not consist of trade and other receivables.

As of 31 December 2024, no amount has a maturity of more than 12 months (2023: nil).

(x EUR 1.000)	31 December 2024	31 December 2023
<b>Loans and advances - banks consists of the following:</b>		
Demand receivables	1,320,454	1,075,501
Interest bearing deposits	1,947	2,051
Mandatory reserve deposits with central banks	6,538	19,450
Less: loan impairment allowance	-1,996	-733
<b>Net loans and advances - banks</b>	<b>1,326,943</b>	<b>1,096,269</b>

None of the amounts in the loans and advances - banks items were subordinated in 2024 or 2023.

(x EUR 1.000)

31 December 2024

31 December 2023

**Of the loans and advances - banks item the following amounts were due from:**

ABN AMRO group companies

672,756

317,409

Third parties

654,187

778,860

**Total loans and advances - banks****1,326,943****1,096,269****An analysis of changes in the carrying amount in relation to loans and advances bank is as follows:**

(x EUR 1.000)

Stage 1

Stage 2

Stage 3

Total

Carrying amount as at 1 January 2024

1,059,485

36,784

1,096,267

Change in carrying amount due to origination and repayment

215,838

215,838

(excluding write offs)

Transfers to Stage 1

Transfers to Stage 2

-95

95

Transfers to Stage 3

Amounts written off

Foreign exchange adjustments

14,836

14,836

**At 31 December 2024****1,290,064****36,879****1,326,943**

(x EUR 1.000)

Stage 1

Stage 2

Stage 3

Total

ECL allowance as at 1 January 2024

-733

-733

New assets originated or purchased

-1,258

-1,258

Assets derecognised or repaid

(excluding write offs)

Transfers to Stage 1

Transfers to Stage 2

Transfers to Stage 3

Amounts written off

Foreign exchange adjustments

-5

-5

**At 31 December 2024****-1,996****-1,996**

(x EUR 1.000)

Stage 1

Stage 2

Stage 3

Total

Carrying amount as at 1 January 2023

1,299,363

36,784

1,336,147

Change in carrying amount due to origination and repayment

-211,140

-211,140

(excluding write offs)

Transfers to Stage 1

Transfers to Stage 2

Transfers to Stage 3

Amounts written off

Foreign exchange adjustments

-28,738

-28,738

**At 31 December 2023****1,059,485****1,096,269**

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1 January 2023	-3,104			-3,104
New assets originated or purchased	2,368			2,368
Assets derecognised or repaid (excluding write offs)				
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	3			3
<b>At 31 December 2023</b>	<b>-733</b>			<b>-733</b>

### 19. Loans and advances customers

The accounting policy for loans and advances is included in note 18

As of 31 December 2024, EUR 55,152 has a maturity of more than 3 months but less than one year (2023: EUR 5,221).

(x EUR 1.000)	31 December 2024	31 December 2023
<b>Loans and advances customers consists of the following:</b>		
Corporate loans, gross	8,631,165	8,579,881
Less: loan impairment allowances - corporate loans	-275	-
<b>Corporate loans</b>	<b>8,630,890</b>	<b>8,579,881</b>

<b>Government and official institutions</b>	10,650	10,650
Receivables from central counterparties	6,180,305	6,034,167
Less: loan impairment allowances - other	-1,162	-1,162
<b>Other loans and advances</b>	<b>6,189,793</b>	<b>6,043,655</b>

<b>Loans and advances customers</b>	<b>14,820,683</b>	<b>14,623,536</b>
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All corporate loans are fully collateralised (e.g. cash, equities, bonds).

(x EUR 1.000)	31 December 2024	31 December 2023
<b>Of the loans and advances customers item, the following amounts were due from:</b>		
ABN AMRO group companies	657	-
Third parties	14,820,026	14,623,536
<b>Loans and advances customers</b>	<b>14,820,683</b>	<b>14,623,536</b>

An analysis of changes in the carrying amount in relation to Corporate loans at amortised cost is as follows:

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2024	8,533,554	46,32		8,579,88
Change in carrying amount due to origination and repayment (excluding write offs)	-229,443	29,102		-200,341
Transfers to Stage 1	5,624	-5,624		0
Transfers to Stage 2	-4	4		0
Transfers to Stage 3		-635	635	0
Amounts written off				
Foreign exchange adjustments	251,350			251,350
<b>At 31 December 2024</b>	<b>8,561,082</b>	<b>69,175.83</b>	<b>634.51</b>	<b>8,630,891</b>

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1 January 2024				
New assets originated or purchased			-275	-275
Assets derecognised or repaid (excluding write offs)				
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments				
<b>At 31 December 2024</b>			<b>-275</b>	<b>-275</b>

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2023	6,314,591	115,010	8,917	6,438,517
Change in carrying amount due to origination and repayment	2,377,328	-68,323	-1,312	2,307,693
-excluding write offs				
Transfers to Stage 1	8,126	-8,126		0
Transfers to Stage 2	-162	162	-7,605	-7,605
Transfers to Stage 3		7,605		7,605
Amounts written off				
Foreign exchange adjustments	-166,329			-166,329
<b>At 31 December 2023</b>	<b>8,533,554</b>			<b>8,579,881</b>

An analysis of changes in the carrying amount in relation to Other loans and advances is as follows:

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2024	6,042,493		1,162	6,043,65
Change in carrying amount due to origination and repayment	3,485			3,485
(excluding write offs)				
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	142,653			142,653
<b>At 31 December 2024</b>	<b>6,188,631</b>		<b>1,161.92</b>	<b>6,189,793</b>



(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
"ECL allowance as at 1 January 2024"			-1,162	-1,162
New assets originated or purchased				
Assets derecognised or repaid (excluding write offs)				
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments				
<b>At 31 December 2024</b>			<b>-1,161.92</b>	<b>-1,162</b>

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2023	6,853,240		1,970	6,855,210
Change in carrying amount due to origination and repayment (excluding write offs)	-710,260		-808	-711,068
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	-100,487			-100,487
<b>At 31 December 2023</b>	<b>6,042,493</b>		<b>1,161.92</b>	<b>6,043,655</b>

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1 January 2023			-1,970	-1,970
New assets originated or purchased				
Assets derecognised or repaid (excluding write offs)			808	808
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments				
<b>At 31 December 2023</b>			<b>-1,161.92</b>	<b>-1,162</b>

## 20. Fair value of financial instruments not carried at fair value

The categorisation and valuation of financial instruments is determined in accordance with the accounting policies set out in note 16.

### Valuation methodologies

The methods and assumptions described below have been applied to estimate the fair value of financial instruments not carried at fair value. These fair values were calculated for disclosure purposes only. Note that the fair value can be significantly impacted by the choice of valuation model and underlying assumptions.

- The fair value of variable rate financial instruments and financial instruments with a fixed rate maturing within six months of the reporting date are assumed to be a reasonable approximation of their carrying amounts, which are net of impairment;
- The fair value of cash and balances at central banks are classified as Level 1 as these instruments have a short term nature, prices from an active market are available and no fair value adjustments are made to the carrying amounts.
- Securities financing includes repurchase and reverse repurchase agreements and securities borrowing and lending transactions. Due to the short-term characteristics of these instruments and the value and liquidity of available collateral, the carrying amounts are considered to approximate the fair value. Securities financing amounts are classified as Level 2.
- The fair value of demand deposits with no specific maturity are assumed to be the amount payable on demand at the reporting date;
- The fair value of the other loans to customers and loans to banks that are repriced frequently and have had no significant changes in credit risk are estimated using carrying amounts that are assumed to be a reasonable representation of the fair value. The fair value of other loans are estimated by discounted cash flow models based on interest rates that apply to similar instruments;
- The fair values of issued debt securities are based on quoted prices. If these are not available, the fair value based on a market approach in which independent quotes from market participants are used for the debt issuance spreads above average interbank offered rates (over a range of tenors) that the market would demand when purchasing new debt from AACB.
- Issued debt securities are valued using discounted cash flow models, based on current interest rate curves that incorporate observable inputs. These instruments are classified as level 2. When there are no, or only limited, publicly quoted prices available for these instruments and unobservable inputs have a significant effect on the fair value calculation, these instruments are classified as level 3.
- AACB refines and modifies its valuation techniques as markets and products develop and as the pricing for individual products becomes more or less readily available. While AACB believes its valuation techniques are appropriate and consistent with other market participants, the use of different methodologies or assumptions could result in different estimates of the fair value at the reporting date.

The following table presents the type of valuation techniques used in determining the fair value of financial instruments carried at amortised cost. In addition, the carrying amount of these financial assets and liabilities recorded at amortised cost is compared with their estimated fair value based on the assumptions mentioned above.

(x EUR 1.000)

At 31 December 2024

At 31 December 2024	Carrying Value	Quoted prices in active market	Valuation technique observable market data	Valuation technique unobservable market data	Total fair value
Cash and balances at central banks	71,471	71,471			71,471
Securities financing	14,973,707		14,560,908	412,799	14,973,707
Loans and receivables - banks	1,326,943		1,326,943		1,326,943
Corporate loans	8,630,890		8,630,890		8,630,890
Other loans and advances customers	6,189,793		6,189,738	55	6,189,793
<b>Total financial assets</b>	<b>31,192,805</b>	<b>71,471</b>	<b>31,121,279</b>	<b>412,854</b>	<b>31,192,805</b>
Securities financing	3,465,336		3,465,336		3,465,336
Due to banks	15,245,658		5,382,107	9,863,551	15,245,658
Due to customers	9,440,204		9,440,204		9,440,204
Issued debt	802,789	802,789			802,789
<b>Total financial liabilities</b>	<b>28,953,987</b>	<b>802,789</b>	<b>18,287,647</b>	<b>9,863,551</b>	<b>28,953,987</b>

(x EUR 1.000)

At 31 December 2023

At 31 December 2023	Carrying Value	Quoted prices in active market	Valuation technique observable market data	Valuation technique unobservable market data	Total fair value
Cash and balances at central banks	1,080,629	1,080,629			1,080,629
Securities financing	11,506,442		11,506,442		11,506,442
Loans and receivables - banks	1,096,269		1,096,269		1,096,269
Corporate loans	8,579,881		8,579,876	5	8,579,881
Other loans and advances customers	6,043,655		6,043,655		6,043,655
<b>Total financial assets</b>	<b>28,306,876</b>	<b>1,080,629</b>	<b>27,226,242</b>	<b>5</b>	<b>28,306,876</b>
Securities financing	2,416,112		2,416,112		2,416,112
Due to banks	14,313,463		7,482,243	6,831,220	14,313,463
Due to customers	9,428,628		9,428,599	29	9,428,628
Issued debt	600,000	600,000			600,000
<b>Total financial liabilities</b>	<b>26,758,204</b>	<b>600,000</b>	<b>19,326,954</b>	<b>6,831,249</b>	<b>26,758,204</b>

## 21. Group structure

### Accounting policy for business combinations

All items representing consideration, including contingent consideration, transferred by AACB are measured and recognised at fair value as at the acquisition date. Transaction costs incurred by AACB in connection with the business combination, other than those associated with the issuance of debt and equity securities, do not form part of the cost of the business combination transaction but are expensed as incurred. The excess of the purchase consideration over AACB's share of the fair value of the identifiable net assets acquired, including certain contingent liabilities, is recorded as goodwill. AACB measures the identifiable assets acquired and the liabilities assumed at the fair value at the date of acquisition.

A gain or loss is recognised in profit or loss for the difference between the fair value of the previously held equity interest in the acquiree and its carrying amount. Changes in interests in subsidiaries that do not result in a change of control are treated as transactions between equity holders and are reported in equity.

For common control transactions, AACB's accounting policy is to use the pooling of interest method, without restatement of prior periods and with reset of equity balances and history.

The general requirements for the pooling of interest method are:

- (a) The assets and liabilities of the combining entities are reflected at their carrying amounts;
- (b) No goodwill is recognised; and
- (c) The income statement reflects the results of the combining entities.

On the 1st of January 2024 AACB received via a common control transaction with equity reset the entities ABN AMRO Holdings USA LLC and ABN AMRO Securities USA LLC from AAB. This following the decision of ABN AMRO to wind down their activities outside Europe.

As a result of this transaction AACB received, via a contribution in kind, 100% of the shares of these entities. The assets received include EUR 42 million in cash and cash equivalents, EUR 4,451 million in securities financing assets, EUR 93 million in tax assets and EUR 45 million other assets. The liabilities received include 4,345 million in securities financing liabilities, EUR 63 million in due to banks, EUR 21 million in provisions and EUR 20 million other liabilities. Part of the EUR 93 million in tax assets is EUR 77 million in deferred tax asset in ABN AMRO Holdings USA. This deferred tax receivable can be recovered when future taxable profit arise in the United States of America.

This transaction resulted in a share premium increase per 1st of January 2024 of EUR 333 million. EUR 183 million due to the addition of the entities via a contribution in kind and an increase of EUR 150 million in cash, received from AAB, to cover for regulatory requirements.

AACB acquired the Brazil entity Banco ABN AMRO SA from ABN AMRO Bank NV on January 1st 2023, which is accounted for as a transaction under common control with reset of equity. For this transaction a cash consideration of EUR 107 million was paid, with no impact on equity.

### Accounting policy for subsidiaries

AACB's subsidiaries are those entities which it directly or indirectly controls. Control over an entity is evidenced by AACB's ability to exercise its power in order to affect the variable returns that AACB is exposed to through its involvement with the entity. The existence and effect of potential voting rights that are currently exercisable are taken into account when assessing whether control exists.

The assessment of control is based on the consideration of all facts and circumstances. AACB reassesses whether it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control (power, exposure to variability in returns and a link between the two).

The financial statements of subsidiaries are included in the consolidated financial statements from the date on which control commences until the date on which control ceases.

#### Accounting policy for associates and joint ventures

Associates are those entities in which AACB has significant influence, but no control or joint control, over the operating and financial policies. Significant influence is generally presumed when AACB holds between 20% and 50% of the voting rights. Potential voting rights that are currently exercisable are considered in assessing whether AACB has significant influence. Amongst other factors that are considered to determine significant influence, representation on the board of directors, participation in policy-making process and material transactions between the entity and the investee are considered.

A joint venture is an investment in which two or more parties have contractually agreed to share control over the investment. Joint control exists only when decisions about the relevant activities require the unanimous consent of the parties sharing control.

Investments in associates and joint ventures are accounted for using the equity method. Under this method the investment is initially recorded at cost of recognition and subsequently increased (or decreased) for post-acquisition net income (or loss), other movements impacting the equity of the investee and any adjustments required for impairment. AACB's share of the profit or loss of the investee is recognised in Share of result in equity accounted investments in the income statement. When AACB's share of losses exceeds the carrying amount of the investment, the carrying amount is reduced to zero, including any other unsecured receivables, and recognition of further losses is discontinued except if AACB has incurred obligations or made payments on behalf of the investee.

Equity investments held without significant influence which are not held for trading or not designated at fair value through profit or loss are classified as financial investments.

## 22. Equity accounted investments

#### Accounting policy for equity accounted investments

Equity accounted investments comprise associates and joint ventures. Associates are those entities in which AACB has significant influence (this is generally assumed when AACB holds between 20% and 50% of the voting rights), but no control or joint control over the operating and financial policies. Joint ventures are investments in which two or more parties have contractually agreed to share control over the investment.

Investments in associates and joint ventures are accounted for using the equity method.

Refer to note 21 for more accounting policies on equity accounted investments.

(x EUR 1.000)

31 December 2024

31 December 2023

#### Equity accounted investments consist of the following:

ABN AMRO Investments USA LLC

285

269

#### Total equity accounted investments

285

269

#### ABN AMRO Investments USA LLC (AAIU)

On 13 January 2016, ABN AMRO Bank N.V. (AAB) and ABN AMRO Clearing USA LLC (AAC-USA), a wholly owned subsidiary of ABN AMRO Clearing Bank N.V. (AACB), each acquired 50% of the investment in AAIU. The two entities together have joint control over AAIU and its relevant activities as a Digital Asset House incorporated in the State of Delaware, the United States of America. The shareholding has not changed in the 2024 financial year.

AAIU's registered office is located in the State of Delaware, the United States of America, at Corporation Service Company, 2711 Centerville Road, Suite 400, City of Wilmington, Country of New Castle 19808.

The shares of AAIU are not quoted on any market and no dividends were declared.



The following is a summary of the combined financial information of the associates and joint ventures, including the aggregated amounts of assets, liabilities, income and expenses, in accordance with IAS 28.37:

(x EUR 1.000)	31 December 2024 Joint ventures	31 December 2023 Joint ventures
Financial investments	530	499
Other assets	102	96
<b>Total assets</b>	<b>632</b>	<b>595</b>
Accrued interest, expenses and other liabilities	62	58
<b>Total liabilities</b>	<b>62</b>	<b>58</b>
<b>Total Equity</b>	<b>570</b>	<b>537</b>
Expenses		11
<b>Total comprehensive income</b>		<b>-11</b>
(x EUR 1.000)	31 December 2024 Joint ventures	31 December 2023 Joint ventures
<b>Equity accounted investment</b>	<b>285</b>	<b>269</b>

## 23. Property and equipment

### Accounting policy for property and equipment and leases

Property and equipment are stated at cost less accumulated depreciation and any amount for impairment. At each balance sheet date, an assessment is performed to determine whether there is any indication of impairment. Subsequent costs are capitalised if these result in an enhancement to the asset. Depreciation is charged to the income statement on a straight-line basis over the estimated useful lives of items of property and equipment, and of major components that are accounted for separately.

AACB generally applies the following useful lives to calculate depreciation:

- The useful life for property and equipment is a maximum of 10 years;
- The useful life for leasehold improvements is the lesser of 10 years or the lease term; and
- The useful life for IT equipment is a maximum of 5 years.

Depreciation rates and residual values are reviewed at least periodically to take into account any change in circumstances. Capitalised leasehold improvements are depreciated in a manner that takes into account the term and renewal conditions of the related lease.

### Accounting policy for leases

All leases, except for low-value leases and leases with a duration of less than one year, are recognised on the balance sheet as a right of use (ROU) asset and lease liability. As a lessee, AACB enters into various lease contracts, mainly for office buildings and cars that the bank leases for its own use. When accounting for the contracts as a lessee, AACB separates non-lease components from lease components. Payments such as variable lease payments that do not depend on an index or a rate and non-lease components are not included in the lease liability. The ROU asset is initially measured at cost, which reflects the initial lease liability, adjusted for upfront lease payments, received incentives and initial direct costs. The initial lease liability is equal to the sum of the fixed lease payments, discounted by the incremental borrowing rate. Given that AACB cannot readily determine the interest rate implicit in the lease, it uses the incremental borrowing rate to measure lease liabilities.

The ROU asset is depreciated over the period of the lease, using the straight-line method.

Adjustments to the ROU asset and corresponding lease liability result from remeasurement and/or modification. Remeasurement occurs when there is a change in the lease term or discount rate, a change in lease payments due to a change in an index or rate, or when AACB changes its assessment regarding purchase, extension or termination options. A lease modification is a change in the scope of the lease, or the consideration of a part of a lease that was not in the original terms and conditions of the lease. A lease modification results in either a separate additional lease or a change in the accounting for the existing lease. In the case of a lease modification not resulting in an additional lease, the lease liability is remeasured by adjusting the carrying amount of the ROU asset and, to reflect the partial or full termination of the lease, recognising any gain or loss in the statement of profit and loss.

Expenses related to short-term leases with a term of less than 12 months and leases of low-value are recognised in the income statement. ROU assets are included in the line item Property and equipment, while the lease liabilities are included in Other liabilities. Depreciation of the ROU assets is included in the line item for depreciation and amortisation of tangible and intangible assets in the income statement, and interest expense on lease liabilities is included in the line item Other interest and similar expense.

(x EUR 1.000)

31 December 2024

31 December 2023

**Total property and equipment**

23,785

24,645

(x EUR 1.000)

2024

	Leasehold improvements	IT equipment	Other property and equipment	Right of use assets	Total
Acquisition costs as at 1 January 2024	11,435	37,140	2,489	27,777	78,841
Investment of subsidiary*	10,681	4,322	2,086	27,836	44,925
Additions	154	6,205	241	838	7,438
Disposals	-10,910	-6,469	-2,143	-29,615	-49,137
Foreign exchange differences	714	798	16	1,603	3,131
<b>Acquisition costs as at 31 December 2024</b>	<b>12,074</b>	<b>41,996</b>	<b>2,689</b>	<b>28,439</b>	<b>85,198</b>
Accumulated depreciation as at 1 January 2024	-8,327	-32,610	-1,498	-11,763	-54,196
Investment of subsidiary*	-6,952	-2,461	-1,533	-6,431	-17,377
Depreciation expense	-726	-1,732	-215	-3,979	-6,652
Disposals	7,102	3,057	1,576	7,069	18,804
Foreign exchange differences	-569	-824	-45	-552	-1,990
<b>Accumulated depreciation as at 31 December 2024</b>	<b>-9,472</b>	<b>-34,570</b>	<b>-1,715</b>	<b>-15,656</b>	<b>-61,413</b>
<b>Property and equipment as at 31 December 2024</b>	<b>2,603</b>	<b>7,426</b>	<b>975</b>	<b>12,782</b>	<b>23,785</b>

\* Assets acquired through the common control acquisition of the US entities.

(x EUR 1.000)

2023

	Leasehold improvements	IT equipment	Other property and equipment	Right of use assets	Total
Acquisition costs as at 1 January 2023	11,017	35,275	1,844	23,860	71,996
Investment of subsidiary**		976	196	548	1,720
Additions	1,563	3,654	577	6,635	12,429
Disposals	-717	-1,132	-69	-2,374	-4,292
Foreign exchange differences	-428	-1,633	-59	-892	-3,012
<b>Acquisition costs as at 31 December 2023</b>	<b>11,435</b>	<b>37,140</b>	<b>2,489</b>	<b>27,777</b>	<b>78,841</b>
Accumulated depreciation as at 1 January 2023	-8,777	-32,724	-1,430	-9,070	-52,001
Investment of subsidiary**		-710	-33	-229	-972
Depreciation expense	-595	-721	-149	-3,902	-5,367
Disposals	717	125	69	1,111	2,023
Foreign exchange differences	328	1,420	45	327	2,121
<b>Accumulated depreciation as at 31 December 2023</b>	<b>-8,327</b>	<b>-32,610</b>	<b>-1,498</b>	<b>-11,763</b>	<b>-54,196</b>
<b>Property and equipment as at 31 December 2023</b>	<b>3,109</b>	<b>4,530</b>	<b>992</b>	<b>16,013</b>	<b>24,645</b>

\*\* Assets acquired through the common control acquisition of the Brazil entity.

### Leasing

AACB leases offices and other premises under non-cancellable operating lease arrangements. The leases have various terms, escalation and renewal rights. There are no contingent rents payable or variable lease payments in lease contracts. AACB also leases equipment under non-cancellable lease arrangements. In 2024, interest expense on lease liabilities amounts to EUR 1.2 million (2023: EUR 0.7 million).

(x EUR 1,000)

31 December 2024

31 December 2023

Where AACB is the lessee, the future minimum lease payments under IFRS 16 are as follows:

Within 3 months	1,226	1,309
More than 3 months but within 1 year	2,644	3,195
More than 1 year but within 5 years	19,464	8,224
More than 5 years	6,877	7,666
<b>Total operating lease agreements</b>	<b>30,211</b>	<b>20,394</b>

### 24. Intangible assets

#### Accounting policy for intangible assets

The accounting policy for software and other intangible assets is determined by IAS 38 Intangible assets. Software is amortised over a period of three years, unless it is classified as core application software, which is depreciated over its estimated useful life, set at a maximum of seven years. Only the development phase is capitalised for own-developed software.

(x EUR 1,000)

2024

2023

<b>Acquisition costs as at 1 January</b>	<b>19,848</b>	<b>16,620</b>
Investment of subsidiary	275	793
Additions	926	3,232
Disposals	-801	-334
Foreign exchange differences	753	-463
<b>Acquisition costs as at 31 December</b>	<b>21,001</b>	<b>19,848</b>

<b>Accumulated amortisation 1 January</b>	<b>-16,671</b>	<b>-15,808</b>
Investment of subsidiary	-275	-419
Amortisation expense	-1,314	-1,210
Disposals	104	322
Foreign exchange differences	-752	444
<b>Accumulated amortisation as at 31 December</b>	<b>-18,908</b>	<b>-16,671</b>

<b>Total intangible assets as at 31 December</b>	<b>2,094</b>	<b>3,177</b>
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No impairments to intangible assets have been recorded in 2024 or 2023.

### 25. Tax assets and liabilities

#### Accounting policy for tax assets and liabilities

AACB applies IAS 12 Income Taxes in accounting for taxes on income. Deferred tax is recognised for qualifying temporary differences. Temporary differences represent the differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts utilised for taxation purposes. The amount of deferred tax provided is based on the expected manner of realisation or settlement of the carrying amount of assets and liabilities, using tax rates enacted at the balance sheet date.

A deferred tax asset is recognised for deductible temporary differences, unused tax losses and unused tax credits to the extent that it is probable that taxable profit will be available against which the deductible temporary differences can be utilised, unless the deferred tax asset arises from the initial recognition of an asset or liability other than in a business combination which, at the time of the transaction, does not affect accounting profit or taxable profit.

Deferred tax assets and liabilities are offset on the balance sheet when there is a legally enforceable right to offset current tax assets against current tax liabilities and an intention to settle on a net basis.

AACB is part of a fiscal unity with AAB for corporate income tax purposes. All members of the fiscal unity are jointly and severally liable for the corporate income tax liabilities of the fiscal unity. Taxes are settled within this tax group as if each company were an autonomous taxpayer.

The current tax asset is the calculated tax position based on actual income over the year less the prepayments made during the year based on the profit estimations.

(x EUR 1.000)

31 December 2024

31 December 2023

<b>Total current tax assets</b>	<b>31,093</b>	<b>39,008</b>
The deferred tax assets can be categorised into:		
Net investment hedge	10,987	10,987
Property and equipment	1,566	1,497
Financial investments		
Deferred income, accrued expenses and other	15,248	6,177
Loans and advances	67	58
Right of use assets	315	380
Carry forward benefits	43,821	6,340
<b>Total deferred tax assets</b>	<b>72,003</b>	<b>25,439</b>

Of the deferred tax assets as per 2024 an amount of EUR 61 million is recorded through the income statement and an amount of EUR 11 million is recorded through equity.

<b>Total tax assets</b>	<b>103,096</b>	<b>64,447</b>
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(x EUR 1.000)

As at 1 January 2024\*

Income statement

As at 31 December 2024

<b>Deferred tax assets</b>			
Financial investments			
Net investment hedges - forex contracts	10,987		10,987
Loans and advances	58	9	67
Deferred income, accrued expenses and other	19,076	-3,829	15,247
Property and equipment	1,754	-188	1,566
Right of use assets	380	-65	315
Carry forward benefits	76,761	-32,940	43,821
<b>Total deferred tax assets</b>	<b>109,017</b>	<b>-37,013</b>	<b>72,004</b>

(x EUR 1.000)

As at 1 January 2023

Income statement

As at 31 December 2023\*

<b>Deferred tax assets</b>			
Financial investments			
Net investment hedges - forex contracts	10,987		10,987
Loans and advances	60	-2	58
Deferred income, accrued expenses and other	4,232	1,945	6,177
Property and equipment	1,721	-224	1,497
Right of use assets	1,645	-1,265	380
Carry forward benefits	2,077	4,263	6,340
<b>Total deferred tax assets</b>	<b>20,722</b>	<b>4,717</b>	<b>25,439</b>

\* The differences between the closing balances of 2023 and opening balances of 2024 are due to the addition of US entities via the common control transaction.

The current tax liability is the calculated tax position based on actual income over the year less the prepayments made during the year based on profit estimations. However, as the entities based in the Netherlands form part of a local tax unity, prepayments are made and booked at central level. Therefore, at year-end the full year amount of the Dutch tax is still considered to be paid for these entities.

(x EUR 1.000)

31 December 2024

31 December 2023

<b>Total current tax liabilities</b>	<b>40,685</b>	<b>36,387</b>
The deferred tax liabilities can be categorised into:		
Property and equipment	-	482
Financial investments	10,691	7,178
Other	371	458
<b>Total deferred tax liabilities</b>	<b>11,062</b>	<b>8,118</b>
<b>Total tax liabilities</b>	<b>51,748</b>	<b>44,505</b>



(x EUR 1.000)	As at 1 January 2024	Income statement	As at 31 December 2024
<b>Deferred tax liabilities</b>			
Financial investments	7,178	3,513	10,691
Property and equipment	482	-482	
Other	458	-87	371
<b>Total deferred tax liabilities</b>	<b>8,118</b>	<b>2,944</b>	<b>11,062</b>

(x EUR 1.000)	As at 1 January 2023	Income statement	As at 31 December 2023
<b>Deferred tax liabilities</b>			
Financial investments	3,265	3,913	7,178
Property and equipment	473	9	482
Other	433	25	458
<b>Total deferred tax liabilities</b>	<b>4,171</b>	<b>3,947</b>	<b>8,118</b>

## 26. Other assets

(x EUR 1.000)	31 December 2024	31 December 2023
<b>The table below shows the components of other assets at 31 December:</b>		
Related to securities transactions*	56,634	27,140
VAT and other tax receivable	9,067	10,031
Other	10,099	4,890
Prepayments	7,187	3,630
Accrued other income	12,678	12,799
<b>Total other assets</b>	<b>95,666</b>	<b>58,491</b>

\* These include transitory amounts related to securities transactions.

## 27. Due to banks

### Accounting policy for due to banks and due to customers

Amounts due to banks and customers are held at amortised cost. That is, fair value at initial recognition, adjusted for repayment and amortisation of coupon, fees and expenses to represent the effective interest rate of the instrument.

(x EUR 1.000)	2024	2023
<b>The table below shows the components of due to banks:</b>		
Demand deposits	1,199,429	472,792
Time deposits	13,805,601	13,840,671
Other deposits	240,628	
<b>Total due to banks</b>	<b>15,245,658</b>	<b>14,313,463</b>
<b>Of the due to banks item the following amounts were with:</b>		
Demand deposits due to banks ABN AMRO group	740,247	169,430
Time deposits due to banks ABN AMRO group	13,735,533	13,838,510
Other deposits due to banks ABN AMRO group	240,628	-
<b>Total ABN AMRO group companies</b>	<b>14,716,408</b>	<b>14,007,940</b>
Demand deposits due to third party banks	459,182	303,362
Time deposits due to third party banks	70,068	2,161
<b>Total third party banks</b>	<b>529,250</b>	<b>305,523</b>
<b>Total due to banks</b>	<b>15,245,658</b>	<b>14,313,463</b>

As of 31 December 2024, an amount of EUR 4.9 billion has a maturity of more than 3 months but less than one year (2023: EUR 5.8 billion, restated).

**28. Due to customers**

The accounting policy for due to customers is included in note 27

(x EUR 1.000)

31 December 2024

31 December 2023

The table below shows the components of due to customers:

Demand deposits	9,439,983	8,121,216
Time deposits	221	1,307,412
<b>Total due to customers</b>	<b>9,440,204</b>	<b>9,428,628</b>

The due to customers item can be split between ABN AMRO group customers and third party customers as follows:

Demand deposits due to customers ABN AMRO group	2,269	10
<b>Total ABN AMRO group companies</b>	<b>2,269</b>	<b>10</b>

Demand deposits due to customers third party	9,437,714	8,121,206
Time deposits due to customers third party	221	1,307,412
<b>Total third party customers</b>	<b>9,437,935</b>	<b>9,428,618</b>

<b>Closing balance as at 31 December</b>	<b>9,440,204</b>	<b>9,428,628</b>
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As at 31 December 2024, there is no amount that has a maturity of more than 3 months but less than one year (2023: EUR 29 thousand).

**29. Issued debt****Accounting policy for issued debt**

Issued debt securities are initially recorded at amortised cost using the effective interest rate method. AACB applies IAS 32 Financial instruments: Presentation to determine whether funding is either a financial liability or equity. Issued financial instruments or their components are classified as financial liabilities where the substance of the contractual arrangement results in AACB having a present obligation to deliver either cash or another financial asset or to satisfy the obligation other than by the exchange of a fixed number of equity shares.

(x EUR 1.000)

31 December 2024

31 December 2023

The issued debt consists of the following:

Bonds and notes issued	802,789*	600,000
<b>Total issued debt</b>	<b>802,789</b>	<b>600,000</b>

\* 200mln additional notes were issued in 2024 for regulatory purposes. Any redemption prior to the final redemption date is subject to regulatory approval of the Resolution Authority. Maturity of the issued debt (at inception) is 2.5 years. The interest rate is the compounded Euro Short-Term Rate over a 1-month period, a fixed liquidity spread (51bps) and a fixed capital spread (52bps).

**30. Provisions****Accounting policy for provisions**

A provision is recognised in the balance sheet when AACB has a legal or constructive obligation as a result of a past event, and it is more likely than not, that an outflow of economic benefits will be required to settle the obligation, and a reliable estimate of the amount of the obligation can be made. If the effect of time value is material, provisions are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market rates and, where appropriate, the risk specific to the liability.

A provision for restructuring is recognised when an obligation exists. An obligation exists when AACB has approved a detailed plan and has raised a valid expectation in those affected by the plan by starting to implement the plan or by announcing its main features. Future operating costs are not provided for.

(x EUR 1.000)

31 December 2024

31 December 2023

<b>Total provisions</b>	<b>11,184</b>	<b>8,715</b>
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The other provision amount mainly relates to a provision related to the potential claim from clients on unpaid stamp duty on securities borrowing transactions between AACB and its clients (EUR 4.2 million). On the basis of information currently available, AACB determines with reasonable certainty that the full amount represents the expected cash outflow of the provisions for the 2025 financial year.

(x EUR 1.000)

	Restructuring provisions	Other Staff provisions	Tax provisions	Other provisions	Total
<b>Balance at 1 January 2023*</b>	<b>1,800</b>			<b>4,346</b>	<b>6,146</b>
Increase due to acquisition subsidiary	3,742	74		8	3,824
Additions		7			7
Release	-1,364				-1,364
Used provision	-79				-79
FX translation	192	4		-15	181
<b>Balance at 31 December 2023</b>	<b>4,291</b>	<b>85</b>		<b>4,339</b>	<b>8,716</b>
Increase due to acquisition subsidiary	19,108		2,011		21,119
Additions		98	144		242
Release	-972				-972
Used provision	-16,114		-120	-97	-16,331
FX translation	-97	-2	115	-17	-1
Transfer	-2,143	555			-1,588
<b>Balance at 31 December 2024</b>	<b>4,073</b>	<b>736</b>	<b>2,150</b>	<b>4,225</b>	<b>11,184</b>

\* The 2023 table is recategorised.

**31. Other liabilities**

(x EUR 1.000)

31 December 2024

31 December 2023

**The table below shows the components of other liabilities at 31 December:**

Related to securities transactions*	283,470	185,447
Rebilling cost by ABN AMRO group	65,875	62,340
Accounts payable	35,962	24,764
Lease liabilities	30,211	20,394
Accrued expenses	17,190	16,462
VAT and other tax payable	3,290	1,829
Other	40,071	32,179
<b>Total other liabilities</b>	<b>476,069</b>	<b>343,414</b>

\* These include transitory amounts related to securities transactions.

**32. Equity attributable to owner of the company****Accounting policy for equity**

Share capital and other components of equity

**Other reserves**

The other reserves mainly comprise retained earnings and the profit for the period.

**Currency translation reserve**

The currency translation reserve represents the cumulative gains and losses on the translation of the net investment in foreign operations, net of the effect of hedging.

**Net investment hedging reserve**

The net investment hedging reserve is comprised of the currency translation differences arising on translation of the currency of these instruments to euros, for the extent they are effective.

**Fair value reserves**

Under IFRS 9 the fair value reserve includes the gains and losses, net of tax, resulting from a change in the fair value of debt instruments measured at FVOCI. When the instruments are sold or otherwise disposed of, the related cumulative gain or loss recognised in equity is recycled to the income statement.

**Dividends**

Dividends on ordinary shares and preference shares classified as equity are recognised as a distribution of equity in the period in which they are approved by shareholders.

The issued and paid-up share capital of AACB did not change in the 2024 financial year. Authorised share capital amounts to EUR 50.000.000 distributed over 50.000 shares each having a par value of EUR 1.000. Of this authorised share capital, 15.000 shares have been issued at a par value of EUR 1.000. At year-end 2024, all shares were held by ABN AMRO.

(x EUR 1.000)

	31 December 2024	31 December 2023
Share capital	15,000	15,000
Share premium	338,024*	5,363
Other reserves (incl. retained earnings/profit for the period)	2,009,697	1,841,563
Other comprehensive income	111,595	52,426
<b>Equity attributable to owner of the company</b>	<b>2,474,316</b>	<b>1,914,352</b>

\* As part of the US common control transaction, share premium increased by EUR 183 million, due to the addition of the US entities. Moreover, AACB received EUR 150 million cash as share premium from AAB, to cover for regulatory requirements.

For the details on the changes in shareholder's equity we refer to the consolidated statement of changes in shareholder's equity.

(x EUR 1.000)

	31 December 2024	31 December 2023
Gross fair value reserve	43	5
Related tax	-35	-16
<b>Fair value reserve</b>	<b>8</b>	<b>-11</b>
Gross currency translation reserve	163,384	104,232
Related Tax	-4,063	-4,063
<b>Currency translation reserve</b>	<b>159,321</b>	<b>100,169</b>
Gross net investment hedge reserve	-64,229	-64,229
Related tax	16,496	16,496
<b>Net investment hedge reserve</b>	<b>-47,733</b>	<b>-47,733</b>
<b>Total other comprehensive income</b>	<b>111,595</b>	<b>52,426</b>

The currency translation reserve contains the equity revaluation of the subsidiaries.

The gross revaluation reserve contains the Net Investment Hedge (NIH) which is defined as the hedge of AACB net investment in foreign operations by matching the foreign currency gains or losses on a derivative or liability against the revaluation of a foreign operation based on period end exchange rates. The gain or loss on the hedging instrument is recorded in equity to offset the translation gains and losses on the net investment, to the extent that the hedge is highly effective. The ineffective portion of the hedge relationship is recognised in profit or loss. This NIH policy was applied until 31 December 2010. From that point onwards, revaluation of foreign currency amounts are directly included in the currency translation reserve.

The tax on revaluation reserve can be split in two categories. From the total amount of EUR 16.5 million an amount of EUR 11 million is related to the deferred tax asset of the NIH (see note 25). The remaining amount of EUR 5.5 million is related to the changes in the NIH up to and including 2009. Until that year the tax amount of the NIH was already settled with the tax authorities.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>Unrealised gains as at 1 January</b>	<b>52,426</b>	<b>91,185</b>
Unrealised gains during the year	38	42
Unrealised currency translation differences	59,152	-38,780
Related tax	-20	-21
<b>Other comprehensive income as at 31 December</b>	<b>111,595</b>	<b>52,426</b>



### 33. Commitments and contingent liabilities

#### Accounting policy for commitments and contingent liabilities

##### Contingencies

Contingent liabilities are possible obligations whose existence will be confirmed only by uncertain future events, and present obligations where the transfer of economic resources is uncertain or cannot be reliably measured. Contingent liabilities are not recognised on the balance sheet but are disclosed if the likelihood of an outflow of economic resources is not more likely than not, or if the likelihood of an outflow of economic resources is more likely than not, but cannot be reliably estimated.

##### Committed credit facilities

Commitments to extend credit take the form of approved but undrawn loans and revolving facilities. New loan offers have a commitment period that does not extend beyond the normal underwriting and settlement period.

##### Guarantees

AACB provides guarantees and letters of credit to guarantee the performance of subsidiaries, associates and customers to third parties. AACB expects most transactions to be settled simultaneously with the reimbursement from customers.

(x EUR 1,000)

31 December 2024

31 December 2023

The committed credit facilities consist of the following:

<b>Total committed credit facilities</b>	<b>4,469</b>	<b>146,054</b>
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The guarantees and other commitments consist of the following:

Guarantees	95,000	101,563
Irrevocable payment commitment	10,650	10,650
<b>Total guarantees and other commitments</b>	<b>105,650</b>	<b>112,213</b>

The guarantees have been given to third parties and are divided as follows:

Guarantees given to exchanges	-	5,700
Guarantees given to customers	95,000	95,863
<b>Total Guarantees</b>	<b>95,000</b>	<b>101,563</b>

##### Irrevocable payment commitment

In April 2016, the Single Resolution Board (SRB) in Brussels provided credit institutions with the option to fulfil part of the obligation to pay the annual ex-ante contributions to the Single Resolution Fund (SRF) through irrevocable payments commitments (IPCs). To secure full and punctual payment, when called by the SRB, credit institutions need to constitute cash collateral and fully transfer (legal) ownership to the SRB.

(x EUR 1,000)

31 December 2024

	Less than one year	Between one and three years	Between three and five years	After five years	Total
Guarantees given to exchanges					-
Guarantees given to customers				95,000	95,000
<b>Total Guarantees</b>				<b>95,000</b>	<b>95,000</b>

(x EUR 1,000)

31 December 2023

	Less than one year	Between one and three years	Between three and five years	After five years	Total
Guarantees given to exchanges				5,700	5,700
Guarantees given to customers	563	300		95,000	95,863
<b>Total Guarantees</b>	<b>563</b>	<b>300</b>		<b>95,000</b>	<b>101,563</b>

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2024	241,917			241,917
Change in carrying amount due to origination and repayment (excluding write offs)	-189,000			-189,000
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	46,552			46,552
<b>At 31 December 2024</b>	<b>99,469</b>			<b>99,469</b>

(x EUR 1.000)	Stage 1	Stage 2	Stage 3	Total
Carrying amount as at 1 January 2023	249,258			249,258
Change in carrying amount due to origination and repayment (excluding write offs)	-4,213			-4,213
Transfers to Stage 1				
Transfers to Stage 2				
Transfers to Stage 3				
Amounts written off				
Foreign exchange adjustments	-3,128			-3,128
<b>At 31 December 2023</b>	<b>241,917</b>			<b>241,917</b>

### Other contingencies

In the normal course of business, AACB is subject to litigation and regulatory proceedings. Management of AACB, after consultation with legal counsel, believes that the outcome of such proceedings will not have a material adverse effect on the company's financial position.

In presenting the Consolidated Annual Financial Statements, management estimates the outcome of legal, regulatory and arbitration matters, and takes provisions to the income statement when losses with respect to such matters are more likely than not. Provisions are not recognised for matters for which an expected cash outflow cannot be reasonably estimated or that are not more likely than not to lead to a cash outflow. Some of these matters may be regarded as a contingency. In particular, the following matter is regarded as contingent liability:

### Facilitation of equity trading in Germany

German authorities are conducting investigations into the involvement of individuals from various banks and other parties in equity trading extending over dividend record dates in Germany, including several forms of tainted dividend arbitrage (i.e. tainted dividend stripping including so-called cum/ex and cum/cum transactions). ABN AMRO's legal predecessor, Fortis Bank (Nederland) N.V., ABN AMRO and several (former) subsidiaries were directly or indirectly involved in these transactions in the past in various capacities. Criminal investigation proceedings relating to the activities of these entities and individuals involved at the time were instigated. AACB (and its legal predecessor) has been the custody and/or clearing bank in respect of ABN AMRO (and its legal predecessor and subsidiaries) and other parties that performed these transactions and is cooperating with these investigations.

AACB also frequently receives information requests from German authorities and authorities in other jurisdictions in relation to investigations into alleged dividend arbitrage of its clients. AACB cooperates and provides the requested information to the fullest extent possible and as permitted by applicable law.

### Related civil claims

One third party allegedly involved in cum/ex transactions with respect to certain German funds filed a joint and several liability civil law claim with the German court against AACB and 29 other parties for amounts of withholding tax recovered by the German tax authorities from this third party.

Another third party filed a claim against AACB and ABN AMRO (in first instance and in appeal) with the Dutch court for breach of contracts and for not being able to execute its planned trades in equity in various jurisdictions. The Court of Appeal partially overturned the positive ruling of the lower court and awarded the claim of the third party against AACB. AACB filed an appeal with the Supreme Court. On the 16th of May 2025, the Supreme Court annulled the ruling of the Court of Appeal in favour of AACB. The matter is referred to another Court of Appeal. Although AACB considers it not probable that any further claim will be successful, the possibility that they will succeed cannot be ruled out.

Overall, it cannot be excluded that AACB will be faced with financial consequences as a result of its role as execution provider, depository and/or clearing bank for parties involved in dividend stripping transactions, in particular corporate administrative fines, forfeiture orders and civil law claims. It is currently unclear, however, how and when the German authorities' investigations will impact AACB and if and to what extent corporate administrative fines or forfeiture orders will be imposed. It is also uncertain whether tax authorities or any third parties will successfully claim amounts from AACB in (secondary) tax liability or civil law cases. Therefore, the financial impact cannot be reliably estimated at this time and no provision has been made in this respect.

### 34. Pledged, encumbered and restricted assets

#### Accounting policy for pledged, encumbered and restricted assets

Pledged assets are assets pledged as collateral for liabilities or contingent liabilities and the terms and conditions relating to its pledge. Encumbered assets are those that are pledged or other assets which we believed to be restricted to secure, credit-enhance or collateralise a transaction.

In principle, pledged assets are encumbered assets.

Significant restrictions on assets can arise from statutory, contractual or regulatory requirements such as:

- Those that restrict the ability of the parent or its subsidiaries to transfer cash or other assets to (or from) other entities within AACB.
- Guarantees or other requirements that may restrict dividends and other capital distributions being paid, or loans and advances being made or repaid to other entities within AACB.
- Protective rights of non-controlling interests might also restrict the ability of AACB to access and transfer assets freely to or from other entities within AACB and to settle liabilities of AACB.

AACB only has restrictions due to the prevailing regulatory requirements per region.

Pledged and encumbered assets are assets given as security to guarantee payment of a debt or fulfilment of an obligation. Predominantly, the following activities conducted by AACB are related to pledged assets:

- Cash provided as collateral to secure trading transactions;
- Cash pledged to secure lending in reverse repurchase transactions and securities borrowing transactions;
- Cash and securities pledged to secure CFD or OTC transactions.

AACB has a clearing member contract with various CCP's. Such contracts contain the rules and regulations in relation to cash provided as collateral.

(x EUR 1.000)

31 December 2024

31 December 2023

#### Assets pledged:

Securities financing assets	13,097,657	9,329,653
Derivatives		1
Financial assets held for trading	1,653	804
Financial investments	9,370	14,800
Loans and advances- banks	183,902	254,452
Other loans and advances customers	6,189,793	6,043,655
<b>Total assets pledged as security</b>	<b>19,482,375</b>	<b>15,643,365</b>

Off balance sheet collateral is held as security for assets mainly as part of professional securities transactions. AACB obtains securities on terms which permit it to re-pledge the securities to others.

### 35. Related parties

Parties related to AACB include the parent ABN AMRO Bank N.V. with significant influence, associates, the Management Board, the Supervisory Board, close family members of any person referred to above, entities controlled or significantly influenced by any person referred to above and any other related entities.

#### Transactions

As part of its business operations, AACB frequently enters into transactions with related parties. Normal banking transactions relate to transactions, loans and deposits and are entered into under the same commercial and market terms that apply to non-related parties. ABN AMRO owns all the shares of AACB.

#### Labour contract employees Amsterdam

Every employee of AACB in the Netherlands has a labour contract with ABN AMRO. The total salary costs including pensions and social security charges in 2024 was EUR 76.37 million (2023: EUR 67.63 million). The salary costs are paid by ABN AMRO and rebilled to AACB.

**Balances with Related Parties**

(x EUR 1.000)

**Associates****Parent****Other Related Parties****For the period ending 31 December 2024**

Assets		2,272,525	119,781
Liabilities		16,411,220	70
Collateral received		561,120	

**2024**

Income received		77,726	17
Expenses paid		1,203,905	681

**For the period ending 31 December 2023**

Assets		1,670,388	80,415
Liabilities		14,672,835	45
Collateral received		628,421	

**2023**

Income received		62,213	10,190
Expenses paid		978,097	527

There were no transactions between AACB and the joint venture, ABN AMRO Investments USA LLC during 2023 or 2024.

**Remuneration of the Management Board and Supervisory Board**

The remuneration of the Management board members, which consists of 4 FTE's (2023: 4 FTE's) is stated in the table below. The remuneration of the Supervisory Board members in 2024 was EUR 102 thousand (2023: 88 thousand).

As long as the Dutch state holds an interest in ABN AMRO, the bonus prohibition prohibits the payment of variable remuneration and individual salary increases to the AACB Management Board.

(x EUR 1.000)

**Base salary****Total pension related contributions****Total**

<b>Total in 2024</b>	1,530	367	<b>1,897</b>
<b>Total in 2023</b>	1,476	351	<b>1,827</b>

**36. Cash flow statement****Accounting policy for Cash flow statement**

For the purposes of the cash flow statement, cash and cash equivalents comprise cash on hand, freely available balances with central banks and other banks and net credit balances on current accounts with other banks, which have a maturity of less than three months from the date of acquisition. The statement of cash flows, based on the indirect method of calculation, provides details of the source of cash and cash equivalents, which became available during the year and the application of these cash and cash equivalents over the course of the year. The cash flows are analysed into cash flows from operations, including clearing activities, investment activities and financing activities. Movements in loans and receivables and interbank deposits are included in the cash flow from operating activities. Investment activities are comprised of acquisitions, sales and redemptions in respect of financial investments, as well as investments in, and sales of, subsidiaries, associates, property and equipment. The issuing of shares and the borrowing and repayment of long-term funds are treated as financing activities.

The following table shows the determination of cash and cash equivalents at 31 December:

(x EUR 1.000)

**31 December 2024****31 December 2023**

Cash and balances at central banks	71,471	1,080,629
Loans and advances banks*	1,096,993	989,880
<b>Total cash and cash equivalents</b>	<b>1,168,464</b>	<b>2,070,509</b>

\* These are nostro accounts, with credit balance, that AACB holds with other credit institutions.

**37. Post-balance sheet date events**

There have been no significant events between the year-end date and the date of approval of these financial statements which would require a change or disclosure in the financials.



# Company Financial Statements

## Company statement of profit or loss

(x EUR 1.000)

	Note	2024	2023
<b>Income</b>			
Interest income		1,506,006	1,413,509
Interest expense		1,327,976	1,247,567
Other interest and similar expense		117	-15
<b>Net interest income</b>	<b>1</b>	<b>177,913</b>	<b>165,957</b>
Fee and commission income		324,831	278,921
Fee and commission expense		144,438	113,733
<b>Net fee and commission income</b>		<b>180,393</b>	<b>165,188</b>
Share of result in equity accounted investments	2	188,126	171,113
Other operating income	3	25,131	8,300
<b>Operating income</b>		<b>571,563</b>	<b>510,558</b>
<b>Expenses</b>			
Personnel expenses	4	106,784	93,779
General and administrative expenses		143,640	164,752
Depreciation and amortisation of (in)tangible assets		5,629	2,320
<b>Operating expenses</b>		<b>256,053</b>	<b>260,851</b>
Impairment charges on financial instruments		1,494	-3,185
<b>Total expenses</b>		<b>257,547</b>	<b>257,666</b>
<b>Operating profit / (loss) before taxation</b>		<b>314,016</b>	<b>252,892</b>
Income tax expense		30,008	21,642
<b>Profit (loss) for the year</b>		<b>284,008</b>	<b>231,250</b>



## Company statement of financial position

(x EUR 1.000)

	Note	2024	2023
<b>Assets</b>			
Cash and balances at central banks	5	71,379	1,080,609
Short term government paper	6	70,330	68,279
Loans and advances banks	7	4,933,807	4,779,676
Loans and advances customers	8	16,755,359	17,988,455
Equity securities	9	47,873	26,219
Participating interest in group companies	10	1,716,889	1,299,393
Intangible assets	11	1,021	1,706
Property and equipment	12	3,042	1,596
Other assets	13	90,536	68,295
<b>Total assets</b>		<b>23,690,236</b>	<b>25,314,228</b>
<b>Liabilities</b>			
Due to banks	14	13,077,118	14,619,550
Due to customers	15	7,084,600	7,969,219
Issued debt	16	802,789	600,000
Provisions	17	3,684	4,518
Other liabilities	18	247,767	206,587
<b>Total liabilities</b>		<b>21,215,958</b>	<b>23,399,874</b>
<b>Equity</b>			
Share capital		15,000	15,000
Share premium		338,024	5,363
Revaluation reserves		7	-11
Currency translation reserves		111,588	52,436
Legal reserves		33,248	17,718
Other reserves		1,707,932	1,597,086
Profit/(loss) for the period		268,477	226,759
<b>Total Equity</b>	<b>19</b>	<b>2,474,276</b>	<b>1,914,351</b>
<b>Total Liabilities and Equity</b>		<b>23,690,234</b>	<b>25,314,225</b>
Committed credit facilities	20	49,203	147,162
Guarantees and other commitments	20	489,748	606,968

## Company statement of changes in equity

(x EUR 1.000)

	Share capital	Share Premium	Retained earnings	Unappropriated result of the year	Legal reserves	Fair value reserve	Currency translation reserve	Net investment hedging reserve	Total
Balance as at 1 January 2023	15,000	5,363	1,409,456	187,849	13,227	-32	138,951	-47,732	1,722,082
Total comprehensive income				231,250		21	-38,782		192,489
Transfer			187,849	-187,849					
Transfer to legal reserve				-4,491	4,491				
Other			-219						-219
Balance as at 31 December 2023	15,000	5,363	1,597,086	226,759	17,718	-11	100,169	-47,732	1,914,351
Balance as at 1 January 2024	15,000	5,363	1,597,086	226,759	17,718	-11	100,169	-47,732	1,914,351
Total comprehensive income				284,008		18	59,152		343,178
Transfer			226,759	-226,759					0
Transfer to legal reserve				-15,530	15,530				0
Dividend payment			-116,000						-116,000
Increase of capital		332,661*							332,661
Other			128						128
Balance as at 31 December 2024	15,000	338,024	1,707,973	268,478	33,248	7	159,321	-47,732	2,474,318

\* As part of the US common control transaction, share premium increased by EUR 183 million, due to the addition of the US entities. Moreover, AACB received EUR 150 million cash as share premium from AAB, to cover for regulatory requirements.





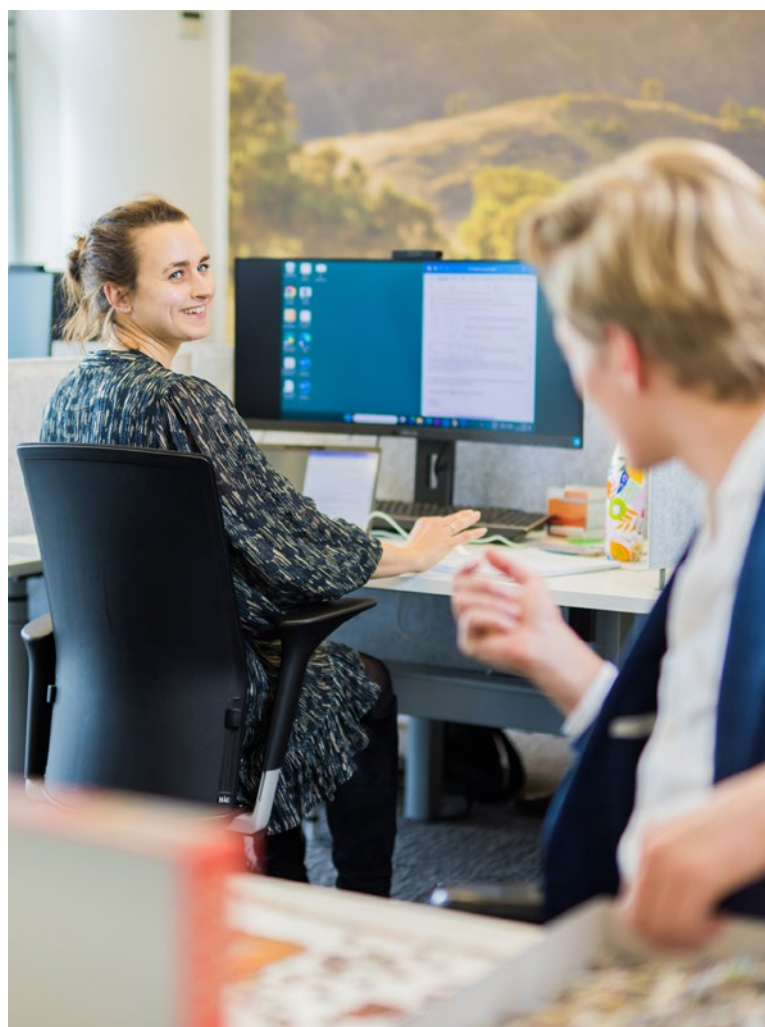
# Accounting principles for the company statement

## Basis of preparation

AACB's company financial statements have been prepared in accordance with Title 9, Book 2 of the Dutch Civil Code, applying the same accounting policies as for the Consolidated Financial Statements. The Company Financial Statements are compiled taking into account ABN AMRO Clearing Bank N.V. and the legal entities and companies that form part of the Company. The registered offices are at Gustav Mahlerlaan 10, 1082 PP Amsterdam, the Netherlands (Chamber of Commerce number 33170459).

## Principles for the measurement of assets and liabilities and determination of the result

For setting the principles for the recognition and measurement of assets and liabilities and determination of the result for its company financial statements, ABN AMRO Clearing Bank N.V. applies the option provided in section 2:362(8) of the Dutch Civil Code. By making use of this option, reconciliation is maintained between the consolidated and the company's equity. This means that the principles for the recognition and measurement of assets and liabilities and determination of the result (hereinafter referred to as principles for recognition and measurement) of the company financial statements of ABN AMRO Clearing Bank N.V. are the same of those applied for the consolidated IFRS financial statements. Participating interests, over which significant influence is exercised, are stated on the basis of the equity method. The consolidated IFRS financial statements are prepared according to the standards laid down by the International Accounting Standards Board and adopted by the European Union.



## Notes to the company income statement

### 1. Net interest income and interest expense

This item includes interest income and interest expense from banks and customers.

(x EUR 1.000)

	2024	2023
Total interest income	1,506,006	1,413,509
Total interest expense	1,328,093	1,247,552
<b>Net interest income</b>	<b>177,913</b>	<b>165,957</b>

Net interest income for 2024 amounted to EUR 1.506 million, an increase of EUR 92 million compared to EUR 1.413 million. Net interest income is comprised of interest income from loans, investments and other lending, interest expense on borrowings by AACB and client accounts.

### 2. Share of result in equity accounted investments

(x EUR 1.000)

	2024	2023
<b>Total realised result on equity accounted investments</b>	<b>188,126</b>	<b>171,113</b>

Net interest income for 2024 amounted to EUR 1.506 million, an increase of EUR 92 million compared to EUR 1.413 million. Net interest income is comprised of interest income from loans, investments and other lending, interest expense on borrowings by AACB and client accounts.

### 3. Other operating income

(x EUR 1.000)

	2024	2023
Foreign exchange transaction result	701	-1,017
Dividend	3,860	3,222
Realised gain/(loss) on financial transactions	20,383	6,053
Other	187	42
<b>Total other operating income</b>	<b>25,131</b>	<b>8,300</b>

### 4. Personnel expenses

(x EUR 1.000)

	2024	2023
<b>Personnel expenses are specified as follows:</b>		
Salaries and wages	88,469	77,044
Salaries and wages	370	339
Pension expenses	13,072	11,398
Other	4,873	4,998
<b>Total personnel expenses</b>	<b>106,784</b>	<b>93,779</b>

### 5. Cash and balances at central banks

All cash and cash equivalents are available for use in AACB's day-to-day operations.

(x EUR 1.000)

	31 December 2024	31 December 2023
<b>Total cash and balances at central banks</b>	<b>71,379</b>	<b>1,080,609</b>

### 6. Short term government paper

(x EUR 1.000)

	31 December 2024	31 December 2023
Short-term government paper held at fair value through other comprehensive income	70,330	68,279
<b>Total short term government paper</b>	<b>70,330</b>	<b>68,279</b>

(x EUR 1.000)

31 December 2024

31 December 2023

Movements in short term government paper are as follows:

Opening balance as at 1 January	68,279	69,608
Sales to third parties		
Transferred to another group company		
Additions	120	2
Gross revaluation to equity	-8	-7
Exchange rate differences	1,938	-1,325
Closing balance as at 31 December	70,330	68,279

**7. Loans and advances banks**

This item includes all accounts receivable from credit institutions that relate to business operations and own bank accounts and does not consist of trade and other receivables.

(x EUR 1.000)

31 December 2024

31 December 2023

Of the loans and advances banks item, the following amounts were due from:

ABN AMRO group companies	1,874,016	426,904
Third parties	3,059,791	4,352,772
<b>Total loans and advances banks</b>	<b>4,933,806</b>	<b>4,779,676</b>

(x EUR 1.000)

31 December 2024

31 December 2023

Loans and advances banks consists of the following:

Securities financing	3,809,973	4,066,710
Demand receivables	1,119,141	694,142
Mandatory reserve deposits with central banks	6,538	19,450
Less: loan impairment allowance	-1,846	-626
<b>Net loans and advances banks</b>	<b>4,933,806</b>	<b>4,779,676</b>

None of the amounts in the loans and receivables - banks items were subordinated in 2024 or 2023.

**8. Loans and advances customers**

As of 31 December 2023, there is no amount with a maturity of more than 3 months but less than one year (2023: EUR 24 thousand).

(x EUR 1.000)

31 December 2024

31 December 2023

Of the loans and advances customers item, the following amounts were due from:

ABN AMRO group companies	4,098,130	7,565,875
Third parties	12,657,229	10,422,580
<b>Total loans and advances customers</b>	<b>16,755,359</b>	<b>17,988,455</b>

(x EUR 1.000)

31 December 2024

31 December 2023

Loans and advances customers consists of the following:

Corporate loans	11,497,281	14,035,097
Other loans and advances	3,619,657	3,043,709
Securities financing	1,638,421	909,649
<b>Loans and advances customers</b>	<b>16,755,359</b>	<b>17,988,455</b>

All commercial loans are fully collateralised (e.g. cash, equities, bonds).

**9. Equity Securities**

(x EUR 1.000)

**31 December 2024****31 December 2023****The equity securities consists of the following financial instruments:**

Equity securities held at fair value through profit or loss

46,220

25,415

Equity instruments held for trading\*

1,653

804

**Total equity securities****47,873****26,219**

\* These shares are used for hedging portfolio swaps.

**10. Participating interest in group companies**

The movements in the participating interest in group companies, which are accounted for using the equity method, were as follows:

(x EUR 1.000)

**31 December 2024****31 December 2023****Balance as at 1 January****1,299,393****1,106,185**

Increase of capital

18,307

5,399

Unrealised gains/losses

33

16

Dividend paid out

-29,182

-44,261

Foreign exchange differences

57,552

-38,394

Result for the year

188,126

171,113

Investment in subsidiary

182,661

99,335

**Balance as at 31 December****1,716,889****1,299,393****11. Intangible assets**

(x EUR 1.000)

**31 December 2024****31 December 2023****Acquisition costs as at 1 January****5,300****3,321**

Additions

476

1,998

Disposals

-521

-

Foreign exchange differences

179

-19

**Acquisition costs as at 31 December****5,434****5,300****Accumulated amortisation 1 January****-3,594****-3,071**

Amortisation expense

-683

-540

Foreign exchange differences

-136

17

Accumulated amortisation as at 31 December

-4,413

-3,594

**Acquisition costs as at 31 December****5,434****5,300****Total intangible assets as at 31 December****1,021****1,706****12. Property and equipment**

(x EUR 1.000)

**31 December 2024****31 December 2023****Total property and equipment****3,042****1,596**



The tables below shows the categories of property and equipment at 31 December 2024 against net book value, and the comparatives.

(x EUR 1.000)

2024

	Leasehold improvements	IT equipment	Other property and equipment	Right of use assets	Total
<b>Acquisition costs as at 1 January 2024</b>	<b>587</b>	<b>6,675</b>	<b>326</b>	<b>2,188</b>	<b>9,775</b>
Additions		3,131	21	23	3,175
Disposals		-762		-1,115	-1,877
Foreign exchange differences	17	273	9	41	340
<b>Acquisition costs as at 31 December 2024</b>	<b>603</b>	<b>9,317</b>	<b>356</b>	<b>1,137</b>	<b>11,413</b>
<b>Accumulated depreciation 1 January 2023</b>	<b>-587</b>	<b>-6,395</b>	<b>-322</b>	<b>-876</b>	<b>-8,179</b>
Depreciation expense		-741	-2	-476	-1,219
Disposals		762		533	1,295
Foreign exchange differences	-17	-218	-9	-24	-268
<b>Accumulated depreciation as at 31 December 2024</b>	<b>-603</b>	<b>-6,592</b>	<b>-333</b>	<b>-843</b>	<b>-8,371</b>
<b>Property and equipment as at 31 December 2024</b>	<b>-0</b>	<b>2,725</b>	<b>23</b>	<b>294</b>	<b>3,042</b>

(x EUR 1.000)

2023

	Leasehold improvements	IT equipment	Other property and equipment	Right of use assets	Total
<b>Acquisition costs as at 1 January 2023</b>	<b>598</b>	<b>6,506</b>	<b>332</b>	<b>2,434</b>	<b>9,869</b>
Additions		204		2,072	2,276
Disposals				-2,273	-2,273
Foreign exchange differences	-11	-35	-6	-45	-97
<b>Acquisition costs as at 31 December 2023</b>	<b>587</b>	<b>6,675</b>	<b>326</b>	<b>2,188</b>	<b>9,775</b>
<b>Accumulated depreciation 1 January 2023</b>	<b>-598</b>	<b>-6,332</b>	<b>-324</b>	<b>-1,447</b>	<b>-8,701</b>
Depreciation expense		-95	-4	-486	-585
Disposals				1,032	1,032
Foreign exchange differences	11	32	6	25	74
<b>Accumulated depreciation as at 31 December 2023</b>	<b>-587</b>	<b>-6,395</b>	<b>-322</b>	<b>-876</b>	<b>-8,179</b>
<b>Property and equipment as at 31 December 2023</b>		<b>280</b>	<b>4</b>	<b>1,312</b>	<b>1,596</b>

### 13. Other assets

(x EUR 1.000)

31 December 2024

31 December 2023

Other	71,746	49,312
Tax assets	18,790	18,983
<b>Total other assets</b>	<b>90,536</b>	<b>68,295</b>

**14. Due to banks**

(x EUR 1.000)

**31 December 2024****31 December 2023****The table below shows the components of due to banks:**

Demand deposits	1,190,964	466,448
Time deposits	11,828,727	13,840,651
Securities financing	57,427	312,451
<b>Total due to banks</b>	<b>13,077,118</b>	<b>14,619,550</b>

**Of the due to banks item the following amounts were with:**

Demand deposits due to banks ABN AMRO group	740,247	169,430
Time deposits due to banks ABN AMRO group	11,828,709	13,838,489
<b>Total ABN AMRO Group companies</b>	<b>12,568,956</b>	<b>14,007,919</b>

Demand deposits due to third party banks	450,717	297,018
Time deposits due to third party banks	17	2,162
Securities financing due to third party banks	57,427	312,451
<b>Total third party banks</b>	<b>508,161</b>	<b>611,631</b>

<b>Total due to banks</b>	<b>13,077,117</b>	<b>14,619,550</b>
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As of 31 December 2024, an amount of EUR 9.864 million has a maturity of more than 3 months (2023: EUR 6.831 million).

**15. Due to customers**

This item is comprised of amounts due to non-banking customers.

(x EUR 1.000)

**31 December 2024****31 December 2023****The table below shows the components of due to customers:**

Demand deposits	6,857,688	6,904,432
Time deposits		729,868
Securities financing	226,912	334,919
<b>Total due to customers</b>	<b>7,084,601</b>	<b>7,969,219</b>

**The due to customers item can be split up between ABN AMRO group customers and third party customers as follows:**

Demand deposits due to customers ABN AMRO group	1,042,933	844,988
<b>Total ABN AMRO Group companies</b>	<b>1,042,933</b>	<b>844,988</b>

Demand deposits due to customers third party	5,814,755	6,059,444
Time deposits due to customers third party		729,868
Securities financing due to customers third party	226,912	334,919
<b>Total third party customers</b>	<b>6,041,668</b>	<b>7,124,231</b>

<b>Closing balance as at 31 December</b>	<b>7,084,601</b>	<b>7,969,219</b>
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As of 31 December 2023, there is no amount with a maturity of more than 3 months but less than one year (2023: EUR 29 thousand).

**16. Issued debt**

(x EUR 1.000)

**31 December 2024****31 December 2023****The issued debt consists of the following:**

Bonds and notes issued

802,789\*

600,000

**Total issued debt****802,789****600,000**

\* 200mln additional notes were issued in 2024 for regulatory purposes. Any redemption prior to the final redemption date is subject to regulatory approval of the Resolution Authority. Maturity of the issued debt (at inception) is 2.5years. The interest rate is the compounded Euro Short-Term Rate over a 1-month period, a fixed liquidity spread (51bps) and a fixed capital spread (52bps).

**17. Provisions**

(x EUR 1.000)

**31 December 2024****31 December 2023****Total Provisions****3,684****4,518**

The provision amount mainly relates to a provision related to the potential claim from clients on unpaid stamp duty on securities borrowing transactions between AACB and its clients (EUR 4.2 million). On the basis of information currently available, AACB determines with reasonable certainty that the full amount represents the expected cash outflow of the provisions for the 2024 financial year.

(x EUR 1.000)

**31 December 2024****31 December 2023****Opening balance as at 1 January****4,518****5,576**

Additions

Used

-97

Currency translation result

2

2

Releases

-740

-1,060

**Closing balance as at 31 December****3,684****4,518****18. Other liabilities**

(x EUR 1.000)

**31 December 2024****31 December 2023**

Derivatives

35

27

Financial liabilities held for trading

114

7,039

Tax liabilities

36,202

25,569

Other

211,416

173,952

**Total other liabilities****247,767****206,587****19. Equity**

(x EUR 1.000)

**31 December 2024****31 December 2023****Total equity****2,474,276****1,914,351**

The issued and paid-up share capital of AACB did not change in the 2024 financial year. Authorised share capital amounts to EUR 50.000.000 distributed over 50.000 shares each having a par value of EUR 1.000. Of this authorised share capital, 15.000 shares have been issued at a par value of EUR 1.000. At year-end 2024, all shares were held by ABN AMRO.

(x EUR 1.000)

**31 December 2024****31 December 2023****Legal reserves consists of the following:**

Unrealised revaluation results of equity securities through PL

33,248

17,718

**Legal reserves****33,248****17,718**

**20. Commitments and contingent liabilities**

(x EUR 1.000)

**31 December 2024****31 December 2023****The committed credit facilities consist of the following:****Total committed credit facilities****49,203****147,162****The guarantees and other commitments consist of the following:**

Securities borrowing

Guarantees

479,098

596,318

Irrevocable payment commitment

10,650

10,650

**Total guarantees and other commitments****489,748****606,968****The guarantees have been given to third parties and are divided as follows:**

Guarantees given to subsidiaries

384,098

494,755

Guarantees given to clients

95,000

95,863

Guarantees given to exchanges

5,700

**Total guarantees****479,098****596,318**

Many of the guarantees and other commitments are expected to expire without being advanced in whole or in part. This means that the amounts stated do not represent expected future cash flows.



# Acquisitions

AACB acquired via common control the entities ABN AMRO Holdings USA LLC and ABN AMRO Securities USA LLC from ABN AMRO Bank NV on January 1st, 2024.

Amsterdam, 16 May 2025

## Management Board

R.V.C Schellens

J.B.M. de Boer

L.M.R. Vanbockrijck

J.F.E ten Veen

# Rules on profit appropriation as set out in the Articles of Association

The profit shown in the income statement as adopted by the General Meeting of Shareholders has been placed at the disposal of the General Meeting of Shareholders.

# Profit appropriation

The ABN AMRO group policy is to upstream dividends from subsidiaries where appropriate. The dividend 2024 will be based on our current and projected consolidated capital ratios and local regulatory and exchange requirements in combination with our growth strategy. AACB currently proposes to pay a dividend of EUR 142 million. In addition, AACB proposes a capital repayment of EUR 50 million in share premium. The final amounts will be decided at the General Meeting of Shareholders in May 2025.

# Other Information

Independent auditor's report	121
Address	125







# Independent auditor's report

To: the shareholders and supervisory board of ABN AMRO Clearing Bank N.V.

## Report on the audit of the annual financial statements 2024 included in the annual report

### Our opinion

We have audited the accompanying financial statements for the financial year ended 31 December 2024 of ABN AMRO Clearing Bank N.V. (hereinafter: AACB or the Company, and together with its consolidated subsidiaries: the Group) based in Amsterdam, the Netherlands. The annual financial statements comprise the consolidated and company financial statements.

#### In our opinion:

- The consolidated financial statements give a true and fair view of the financial position of AACB as at 31 December 2024 and of its result and its cash flows for 2024 in accordance with International Financial Reporting Standards as adopted in the European Union (EU-IFRSs) and with Part 9 of Book 2 of the Dutch Civil Code
- The company financial statements give a true and fair view of the financial position of AACB as at 31 December 2024 and of its result for 2024 in accordance with Part 9 of Book 2 of the Dutch Civil Code

The consolidated annual financial statements comprise:

- The consolidated statement of financial position as at 31 December 2024
- The following statements for 2024: the consolidated statement of profit or loss, the consolidated statements of comprehensive income, changes in equity and cash flows
- The notes comprising material accounting policy information and other explanatory information

The company financial statements comprise:

- The company statement of financial position as at 31 December 2024
- The company statement of profit or loss for 2024
- The notes comprising a summary of the accounting policies and other explanatory information

### Basis for our opinion

We conducted our audit in accordance with Dutch law, including the Dutch Standards on Auditing.

Our responsibilities under those standards are further described in the Our responsibilities for the audit of the annual financial statements section of our report.

We are independent of AACB in accordance with the EU Regulation on specific requirements regarding statutory audit of public-interest entities, the Wet toezicht accountantsorganisaties (Wta, Audit firms supervision act), the Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. Furthermore, we have complied with the Verordening gedrags- en beroepsregels accountants (VGBA, Dutch Code of Ethics for professional accountants). We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Information in support of our opinion

We designed our audit procedures in the context of our audit of the annual financial statements as a whole and in forming our opinion thereon. The following information in support of our opinion and any findings were addressed in this context, and we do not provide a separate opinion or conclusion on these matters.

### Our understanding of the business

AACB is a globally active multi-asset prime broker, custodian and general clearing member.

These activities are mainly conducted in Europe, Asia-

Pacific, Brazil and the United States with coverage on major exchanges and execution venues. We paid specific attention in our audit to a number of areas driven by the operations of the group and our risk assessment.

We determined materiality and identified and assessed the risks of material misstatement of the annual financial statements, whether due to fraud or error in order to design audit procedures responsive to those risks and to obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion.

Materiality

Materiality	€17.5 million (2023: €15 million)
Benchmark applied	Approximately 4.5% of operating profit before taxation (2023: 5% of operating profit before taxation)
Explanation	Based on our professional judgment, a benchmark of 4.5/5% of operating profit before taxation is an appropriate quantitative indicator of materiality and it best reflects the financial performance of the company. We determined materiality consistent with previous financial year.

We have also taken into account misstatements and/or possible misstatements that in our opinion are material for the users of the annual financial statements for qualitative reasons.

We agreed with the supervisory board that misstatements in excess of €875,000, which are identified during the audit, would be reported to them, as well as smaller misstatements that in our view must be reported on qualitative grounds.

Scope of the group audit

AACB is at the head of a group of entities. The financial information of this group is included in the annual financial statements.

We are responsible for planning and performing the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the components within the group as a basis for forming an opinion on the annual financial statements. We are also responsible for the direction, supervision, review and evaluation of the audit work performed for purposes of the group audit. We bear the full responsibility for the auditor’s report.

Based on our understanding of the group and its environment, the applicable financial framework and the group’s system of internal control, we identified and assessed risks of material misstatement of the

annual financial statements and the significant accounts and disclosures. Based on this risk assessment, we determined the nature, timing and extent of audit work performed, including the entities or business units within the group (components) at which to perform audit work. For this determination we considered the nature of the relevant events and conditions underlying the identified risks of material misstatements for the annual financial statements, the association of these risks to components and the materiality or financial size of the components relative to the group. We communicated the audit work

to be performed and identified risks through instructions for component auditors as well as requesting component auditors to communicate matters related to the financial information of the component that is relevant to identifying and assessing risks.

Our group audit mainly focused on the relevant components of AACB in the Netherlands, Brazil, Japan, Singapore, Hong-Kong, United Kingdom, Australia and the United States. We have:

- Performed audit procedures ourselves at the components in the Netherlands and United Kingdom
- Used the work of other auditors from EY Global member firms when auditing the components in Brazil, Japan, Singapore, Hong-Kong, Australia and the United States

This resulted in a coverage of 98 % of total assets and 90% of the profit before tax. For other components, we performed specified audit procedures and analytical procedures to corroborate that our risk assessment and scoping remained appropriate throughout the audit.

Based on our risk assessment, we determined the level of involvement in component audits. We have visited the component teams in the United States, discussed the group risk assessment and risks of material misstatements, reviewed key local working papers and conclusions, met with local management teams and obtained an understanding of key processes. We interacted regularly with the component teams during various stages of the audit. During these meetings and calls, amongst others, the planning, procedures performed based on risk assessments, findings and observations were discussed and any further work deemed necessary by the primary or component team was then performed. We reviewed key working papers of component auditors using the EY electronic audit file platform, screen sharing or copies of work papers submitted to the group audit team. Our procedures of the larger foreign component team in United States included a site visit.

By performing the audit work mentioned above at the components within the group, together with additional

work at group level, we have been able to obtain sufficient and appropriate audit evidence about the group's financial information to provide an opinion on the annual financial statements.

### Teaming and use of specialists

We ensured that the audit teams both at group and at component level included the appropriate skills and competences which are needed for the audit of a clearing bank. We included team members with specialized knowledge in the areas of IT audit, forensics and have made use of our own specialists in the areas of income tax, valuation of financial instruments, financial investments and compliance and legal.

### Our focus on climate-related risks and the energy transition

Climate change and the energy transition high on the public agenda and lead to significant change for many businesses and society. The management board has reported in its annual report how the company is addressing risk related to climate change, energy transition and the environment, thereby taking into account related regulatory and supervisory guidance and recommendations.

Furthermore, we refer to the section Corporate Social Responsibility in the annual report where the management board discloses its assessment and plans in connection to climate-related risks and the effects of energy transition.

As part of our audit of the financial statements, we evaluated the extent to which climate-related risks and the effects of the energy transition and the company's plans, are taken into account in estimates and significant assumptions as well as in the design of relevant internal control measures. Furthermore, we read the annual report and considered whether there is any material inconsistency between the sustainability information and the financial statements.

Based on the audit procedures performed, we do not deem climate-related risks to have a material impact on the financial reporting judgements, estimates or significant assumptions as at 31 December 2024.

### Our focus on fraud and non-compliance with laws and regulations

#### Our responsibility

Although we are not responsible for preventing fraud or non-compliance and we cannot be expected to detect non-compliance with all laws and regulations, it is our responsibility to obtain reasonable assurance that the annual financial statements, taken as a whole, are free from material misstatement, whether caused by fraud or error. 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.

### Our audit response related to fraud risks

We identified and assessed the risks of material misstatements of the financial statements due to fraud. During our audit we obtained an understanding of the company and its environment and the components of the system of internal control, including the risk assessment process and the management board's process for responding to the risks of fraud and monitoring the system of internal control and how the supervisory board exercises oversight, as well as the outcomes.

We refer to the section Risk Management of the annual report for the management board's (fraud) risk assessment.

We evaluated the design and relevant aspects of the system of internal control and in particular the fraud risk assessment, as well as the code of conduct, whistle blower procedures and incident registration in close co-operation with our forensic specialists. We evaluated the design and the implementation and, where considered appropriate, tested the operating effectiveness, of certain internal controls designed to mitigate fraud risks.

As part of our process of identifying fraud risks, we evaluated fraud risk factors with respect to financial reporting fraud, misappropriation of assets and bribery and corruption in close co-operation with our forensic specialists. We evaluated whether these factors indicate that a risk of material misstatement due to fraud is present.

We incorporated elements of unpredictability in our audit. We also considered the outcome of our other audit procedures and evaluated whether any findings were indicative of fraud or non-compliance.

We addressed the risks related to management override of controls, as this risk is present in all organizations, and we considered the presumed risk of fraud in revenue recognition:

- For the risks related to management override of controls we have performed procedures among other things to evaluate key accounting estimates for management bias that may represent a risk of material misstatement due to fraud, in particular relating to important judgment areas and significant accounting estimates as disclosed in the Critical accounting estimates and judgments section of the accounting policies in the notes to the consolidated annual financial statements. We have also used data analysis to identify and address high-risk journal entries and evaluated the business rationale (or the

lack thereof) of significant extraordinary transactions, including those with related parties.

- With regards to the presumed risk of fraud in revenue recognition, based on our risk assessment procedures, we evaluated that this risk is present in areas that are complex or with higher subjectivity in meeting revenue recognition criteria, more specifically related to tailored European fee schedules of AACB. We describe the audit procedures responsive to the presumed risk of fraud in revenue recognition in the description of our audit approach for the key audit matter Complexity and diversity of the European fee schedules.

We considered available information and made enquiries of relevant functions (including risk management, compliance, internal audit and legal), business line management, the management board, and the supervisory board.

The fraud risks we identified, enquiries and aforementioned procedures we performed and other available information available to us did not lead to specific indications for fraud or suspected fraud potentially materially impacting the view of the annual financial statements.

### **Our audit response related to risks of non-compliance with laws and regulations**

AACB is subject to laws and regulations that directly affect the annual financial statements, including financial reporting standards, corporate tax law and various banking supervisory regulations.

Also, AACB is subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the annual financial statements, for instance through the imposition of fines or instructions. We refer to section Regulatory Environment and Compliance for the areas identified by the management board with a risk of non-compliance with regulations and heightened regulatory scrutiny.

We performed appropriate audit procedures regarding compliance with the provisions of those laws and regulations that have a direct effect on the determination of material amounts and disclosures in the annual financial statements. Furthermore, we assessed factors related to the risks of non-compliance with laws and regulations that could reasonably be expected to have a material effect on the annual financial statements from our general industry experience, through discussions with the management board, inspection of the systematic integrity risk analysis (SIRA), reading minutes, inspection of reports from risk management, compliance and internal audit and performing substantive tests of details of classes of transactions, account balances or disclosures.

We also inspected lawyers' letters and correspondence with regulatory authorities and remained alert to any indication of (suspected) non-compliance throughout the audit. In case of potential non-compliance with laws and regulations that may have a material effect on the annual financial statements, we assessed whether AACB has an adequate process in place to evaluate the impact of non-compliance for its activities and financial reporting and, where relevant, whether AACB implemented remediation plans.

Finally, we obtained written representations that all known instances of non-compliance with laws and regulations have been disclosed to us. Specifically with regard to the progress on the dividend arbitrage, we make reference to the key audit matter on "Legal claims and contingencies".

### **Our audit response related to going concern**

As disclosed in "Basis of preparation" of the notes to the consolidated annual financial statements, the annual financial statements have been prepared on a going concern basis. When preparing the annual financial statements, the management board made a specific assessment of AACB's ability to continue as a going concern and to continue its operations for the foreseeable future.

We discussed and evaluated the specific assessment with the management board exercising professional judgment and maintaining professional skepticism. We considered whether the management board's going concern assessment, based on our knowledge and understanding obtained through our audit of the annual financial statements or otherwise, contains all relevant events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the annual financial statements or, if such disclosures are inadequate, to modify our opinion.

Based on our procedures performed, we did not identify material uncertainties about going concern. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause a company to cease to continue as a going concern.

### **Our key audit matters**

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the annual financial statements. We have communicated the key audit matters to the supervisory board. The key audit matters are not a comprehensive reflection of all matters discussed. In comparison with previous year, besides the additional key audit matter related to the 'Legal Claims and Contingencies', the nature of our key audit matters did not change.



## Complexity and diversity of the European fee schedules

<b>Risk</b>	<p>Clients' fee schedules are customized and depend on a variety of factors including the kind of transaction, volume, the investment type and the related exchanges. As the larger clients in Europe typically have the most tailored fee schedules, we deem the risk to be inherent in the European fee schedules. As the net fee and commission income represents one of the major sources of income and considering our presumed fraud risk related to revenue recognition, we consider this a key audit matter.</p> <p>Please refer to note 3 Net fee and commission income in the consolidated annual financial statements.</p>
<b>Our audit approach</b>	<p>Our audit procedures included, amongst others, evaluating the appropriateness of the company's accounting policies related to revenue recognition, determination of transaction prices and satisfaction of performance obligations in accordance with IFRS 15 "Revenue from contracts with customers" and whether the accounting policies have been applied consistently or whether changes, if any, are appropriate in the circumstances.</p> <p>We evaluated the design and implementation and tested operating effectiveness of the key controls over fee schedules origination and changes, data input and recording in source systems, automated calculation of fees and reconciliation controls with external parties. We applied data-analytics on net fee and commission income stemming from security transactions to recalculate the fees and commissions recorded, thereby verifying their completeness and accuracy.</p> <p>We reconciled the appropriate fee schedules in the subledger to the clients' clearing agreements. In addition, we obtained confirmations from a selection of customers confirming their year-end cash balances in clearing accounts to which fees are charged.</p>
<b>Key observations</b>	<p>Based on our procedures performed we consider the fee and commission income to be reasonably and in compliance with EU-IFRS.</p>

## Estimation and related disclosures of provisions and contingent liabilities for Legal Claims

<b>Risk</b>	<p>In accordance with IAS 37 "Provisions, contingent liabilities and contingent assets", AACB provides for liabilities related to, among others, legal claims and compliance matters when an outflow of resources is probable and reliably estimable. When an outflow of resources is not probable, but possible, or the amount of the outflow cannot be reliably estimated no provision is recognized but is disclosed as a contingent liability.</p> <p>As disclosed in note 30 of the consolidated annual financial statements, AACB recognized at 31 December 2024 total provisions of €11 million (2023: €9 million). In note 33, the commitments and contingent liabilities are disclosed. This includes contingent liabilities in respect of prosecution authorities' investigations and legal proceedings related to dividend arbitrage and certain other claims. Furthermore, developments with regard to legal and compliance risks, including regulatory matters, are disclosed in the annual report.</p> <p>The estimation process in relation to provisions and contingent liabilities is inherently complex. This specifically impacts the determination of whether outflows of resources are probable and can be reliably estimated and the appropriateness of assumptions and judgments used in the estimation of the provisions and disclosure of contingent liabilities. Therefore, we considered the provisions and the disclosures on provisions and contingent liabilities for legal claims to be a key audit matter.</p>
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## Estimation and related disclosures of provisions and contingent liabilities for Legal Claims

<b>Our audit approach</b>	<p>We evaluated AACB's accounting policies related to provisions and contingent liabilities in accordance with IAS 37, and whether assumptions and the methods for making estimates are appropriate and have been applied consistently. We also obtained an understanding of the internal controls and the legal and regulatory framework of the Company. Further, we evaluated the design and implementation of controls by AACB to identify, monitor provisions for obligations and disclose contingent liabilities, and to assess the completeness and accuracy of data used to estimate provisions.</p> <p>For material provisions we challenged the provisioning methodology and tested the underlying data and assumptions used. In respect of legal claims, we examined among others (interim) court rulings and external legal assessments to evaluate management's assessment of the probability of outflows. For the prosecution investigations on dividend arbitrage we considered the status of the investigations and challenged management's assessment and position as per 31 December 2024.</p> <p>We examined the relevant internal reports, minutes of management board and supervisory board meetings, as well as regulatory and legal correspondence to assess developments. We performed follow-up procedures to examine the Company's assessment of the impact on the annual financial statements and the adequacy of risk management disclosures. We obtained legal letters from external counsel and, where appropriate, involved internal legal specialists.</p> <p>Furthermore, we evaluated whether the disclosures provided on the provisions and contingent liabilities with regard to legal and compliance matters as included in note 30 and note 33 to the consolidated annual financial statements are in accordance with EU-IFRSs requirements. In particular, we assessed whether they adequately convey the degree of estimation uncertainty and the estimate of the financial effect.</p>
<b>Key observations</b>	<p>Based on our procedures performed we consider the provisions and the disclosures on provisions and contingent liabilities to be reasonable and in compliance with EU-IFRSs.</p>

## Reliability and continuity of IT environment

<b>Risk</b>	<p>The activities and financial reporting of AACB are highly dependent on the reliability and continuity of the IT environment. Effective general IT controls with respect to change management, logical access, infrastructure, cybersecurity and operations, support the integrity and continuity of the electronic data processing as well as the operating effectiveness of the automated controls.</p> <p>As described in the "Risk management" section in the annual report, the IT environment and the IT organization of AACB continues to be strengthened. There is a risk that the general IT control measures may not always operate as intended and, as a result, internal controls are ineffective. Therefore, we identified the reliability and continuity of the IT environment as a key audit matter.</p>
<b>Our audit approach</b>	<p>IT audit specialists are an integral part of the engagement team and assess the reliability and continuity of the IT environment to the extent necessary for the scope of our audit of the annual financial statements. In this context, we evaluated the design of the IT processes including cybersecurity and tested the operating effectiveness of general IT controls, as well as application controls over data processing, data feeds and interfaces relevant for the financial reporting.</p>

Reliability and continuity of IT environment	
Key observations	<p>We evaluated the design and tested the operating effectiveness of IT general controls related to Access Management, Change Management and IT operations, and we tested the relevant automated controls as embedded in the company’s core transaction processing systems, where we relied upon for financial reporting. Due to ineffectiveness of certain general IT controls, we performed additional substantive procedures on logical user access management and IT continuity for the related systems.</p>
	<p>We also assessed the possible impact of changes in IT applications during the year resulting from the internal transformation activities and remedial measures on the operating effectiveness of general IT controls and the automated controls. Where applicable, we tested internal controls related to cloud computing and third-party service providers.</p>
	<p>Based on our procedures performed we consider the provisions and the disclosures on provisions and contingent liabilities to be reasonable and in compliance with EU-IFRSs.</p>

## Report on other information included in the annual report

The annual report contains other information in addition to the annual financial statements and our auditor’s report thereon.

Based on the following procedures performed, we conclude that the other information:

- Is consistent with the annual financial statements and does not contain material misstatements
- Contains the information as required by Part 9 of Book 2 of the Dutch Civil Code for the management report and the other information as required by Part 9 of Book 2 of the Dutch Civil Code

We have read the other information. Based on our knowledge and understanding obtained through our audit of the annual financial statements or otherwise, we have considered whether the other information contains material misstatements. By performing these procedures, we comply with the requirements of Part 9 of Book 2 of the Dutch Civil Code and the Dutch Standard 720.

The scope of the procedures performed is substantially less than the scope of those performed in our audit of the annual financial statements.

The management board is responsible for the preparation of the other information, including the management report in accordance with Part 9 of Book 2 of the Dutch Civil Code and other information required by Part 9 of Book 2 of the Dutch Civil Code.

## Report on other legal and regulatory requirements

### Engagement

We were engaged by the supervisory board as auditor of AACB on 11 September 2015, as of the audit for the year 2016 and have operated as statutory auditor ever since that date.

### No prohibited non-audit services

We have not provided prohibited non-audit services as referred to in Article 5(1) of the EU Regulation on specific requirements regarding statutory audit of public-interest entities.

### Description of responsibilities regarding the annual financial statements

#### Responsibilities of the management board and the supervisory board for the annual financial statements

The management board is responsible for the preparation and fair presentation of the annual financial statements in accordance with EU-IFRSs and Part 9 of Book 2 of the Dutch Civil Code. Furthermore, the management board is responsible for such internal control as the management board determines is necessary to enable the preparation of the annual financial statements that are free from material misstatement, whether due to fraud or error.

As part of the preparation of the annual financial statements, the management board is responsible for assessing the Company’s ability to continue as a going concern. Based on the financial reporting framework

mentioned, the management board should prepare the annual financial statements using the going concern basis of accounting unless the management board either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so. The management board should disclose events and circumstances that may cast significant doubt on the Company's ability to continue as a going concern in the annual financial statements.

The supervisory board is responsible for overseeing the Company's financial reporting process.

### **Our responsibilities for the audit of the annual financial statements**

Our objective is to plan and perform the audit engagement in a manner that allows us to obtain sufficient and appropriate audit evidence for our opinion.

Our audit has been performed with a high, but not absolute, level of assurance, which means we may not detect all material misstatements, whether due to fraud or error during our audit.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements. The materiality affects the nature, timing and extent of our audit procedures and the evaluation of the effect of identified misstatements on our opinion.

We have exercised professional judgment and have maintained professional skepticism throughout the audit, in accordance with Dutch Standards on Auditing, ethical requirements and independence requirements. The Information in support of our opinion section above includes an informative summary of our responsibilities and the work performed as the basis for our opinion. Our audit further included among others:

- Performing audit procedures responsive to the risks identified, and obtaining audit evidence that is sufficient and appropriate to provide a basis for our opinion
- Obtaining 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 Company's internal control
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the management board
- Evaluating the overall presentation, structure and content of the annual financial statements, including the disclosures

- Evaluating whether the annual financial statements represent the underlying transactions and events in a manner that achieves fair presentation

### **Communication**

We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant findings in internal control that we identify during our audit. In this respect we also submit an additional report to the audit committee of the supervisory board in accordance with Article 11 of the EU Regulation on specific requirements regarding statutory audit of public-interest entities. The information included in this additional report is consistent with our audit opinion in this auditor's report.

We provide the supervisory board with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the supervisory board, we determine the key audit matters:

those matters that were of most significance in the audit of the annual financial statements. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, not communicating the matter is in the public interest.

**Amsterdam, 16 May 2025**

**EY Accountants B.V.**

**signed by N. van der Klauw**



# Address

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