Pursuant to Part
Eight of the Capital
Requirements
Regulation (EU) no.
575/2013 on
prudential
requirements for
credit institutions and
investment firms

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1 Introduction

The provisions of the NBR Regulation No. 5/2013 on prudential requirements for credit institutions and Part Eight of Regulation (EU) No. 575/2013 of the Parliament and of the Council of June 2013 on prudential requirements for credit institutions and investment firms, hereinafter referred to as the Capital Requirements Regulation (CRR) apply to BCR Group, hereinafter referred to as BCR Group. This Report is prepared on a consolidated basis (IFRS) according to NBR's Regulations. All information is presented as of September 30th 2020 unless otherwise stated.

Following an overall frequency assessment of all Pillar 3 disclosures this quarterly Pillar 3 Report provides principally an update to the areas mentioned below, which are also in line with the recommendations provided by the European Banking Authority ("EBA") in its "Final Report on the Guidelines on Disclosure Requirements under Part Eight of Regulation (EU) No. 575/2013" ("EBA Guideline", EBA/GL/2016/11, version 2).

Areas which require that quarterly disclosures be provided:

- Information pertaining to own funds and relevant ratios based on Regulation No. 1423/2013, laying down implementing technical standards with regard to disclosure of own funds requirements for institutions;
- Information pertaining to the Leverage Ratio based on Regulation No. 200/2016, laying down implementing technical standards with regard to disclosure of the leverage ratio for institutions;
- Information pertaining to total RWA forming the denominator of the risk-based capital requirements calculated in accordance with Article 92 of the CRR. As per EBA/GL/2016/11, version 2, Template "EU OV1 – Overview of RWAs" will be used in order to disclose the information required.
- Information pertaining to comparison of institutions' own funds and capital and leverage ratios with and without the application
 of transitional arrangements for IFRS 9 or analogous ECLs, according to EBA/GL/2020/12.

For the full set of information required under NBR Regulation No. 5/2013 on prudential requirements for credit institutions and Part Eight of Regulation (EU) No. 575/2013 of the Parliament and of the Council of June 2013 on prudential requirements for credit institutions and investment firms please refer to "BCR GROUP DISCLOSURE REPORT 2019" which is available on the BCR Group website (https://www.bcr.ro/en/investors/transparency-and-public-disclosure/2019)



2 Overview of Non-applicable Disclosures

The following table provides an overview of the CRR Articles which are not covered by the quarterly Disclosure Report alongside an explanation regarding the reason behind their non-applicability.

1 Non-applicable CRR articles

CRR article number	Disclosure requested in the CRR art		Reason for non-applicable disclosure	Non-applicable templates	
438 (d)	Capital requirements	For institutions calculating risk-weighted exposure amounts in accordance with Chapter 3 of Part Three, Title II, 8 % of the risk-weighted exposure amounts for each of the exposure classes specified in Article 147. For the retail exposure class, this requirement applies to each of the categories of exposures to which the different correlations in Article 154(1) to (4) correspond. For the equity exposure class, this requirement applies to: (i) each of the approaches provided in Article 155; (ii) exchange traded exposures, private equity exposures in sufficiently diversified portfolios, and other exposures; (iii) exposures subject to supervisory transition regarding own funds requirements; (iv) exposures subject to grandfathering provisions regarding own funds requirements.	The BCR Group does not apply the internal credit risk model.	Template EU CR8, Template EU CCR7	
444	Use of ECAIs	Information related to ECAIs used for calculation of the RWA exposure amounts.	BCR does not use ECAIs for computing risk weighted exposure amounts.	Template EU CR5	
452	Use of the IRB Approach to credit risk	Information related to the calculation of the risk-weighted exposure amounts under the IRB Approach.	BCR Group calculates the risk-weighted exposure amounts under Standardized approach.	Template EU CR6	
455	Use of Internal Market Risk Models	Information to be disclosed in accordance with Article 363 for capital requirement calculation.	The BCR Group does not apply the internal market risk model.	Template EU MR2-A, Template EU MR2-B	



3 Own Funds

DISCLOSURE REQUIREMENT COVERED BY: ART. 437 CRR

Group Own Funds

Based on the requirements defined by the European Bank Authority in EBA/GL/2016/11, version 2, the information listed below must be provided quarterly:

- Total amount of Common Equity Tier 1 capital, which amounts to 8,098,331 thousands RON before regulatory adjustments and 7,489,977 thousands RON after regulatory adjustments;
- Total amount of Additional Tier 1, which amounts to 0 thousands RON;
- Total amount of Tier 1 capital, which amounts to 7,489,977 thousands RON;
- Total amount of Tier 2 capital, which amounts to 286,162 thousands RON;
- Total amount of capital, which amounts to 7,776,138 thousands RON;
- Total regulatory adjustments to each capital aggregate 608,354 thousands RON and 0 thousands RON;
- Common Equity Tier 1 ratio, which is equal to 19.22%;
- Tier 1 ratio, which is equal to 19.22%;
- Total capital ratio, which is equal to 19.96%.

CRR Statement of financial position

Due to different applicable regulations, BCR Group distinguishes two consolidation perimeters:

- Prudential consolidation perimeter in accordance with articles 18 and 19 from CRR;
- Accounting consolidation perimeter in accordance with IFRS 10 Consolidated Financial Statements.

The table below presents the information regarding the consolidation method applied for each entity according to accounting and prudential perimeters:



2 Template EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)

	Method of accounting consolidation	Method of regulatory consolidation							
Name of the entity		Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	Equity method	Description of the entity		
Banca Comerciala Romana	Full consolidation	Х					Credit institution		
BCR Chisinau	Full consolidation	Х	X Credit institution			Credit institution			
BCR Banca pentru Locuinte	Full consolidation	Х					Credit institution		
BCR Leasing	Full consolidation	Х					Other Financial Corporation - Finance Leasing		
BCR Pensii Full consolidation		Х					Other Financial Corporation - Administrator of Pension Fund		
BCR Suport Colect	Full consolidation	Х					Non Financial Corporation - ancillary services undertaking		
CIT ONE (BCR Procesare) Full consolidation		х					Non Financial Corporation - ancillary services undertaking		
BCR Payments	Full consolidation	Х					Other Financial Corporation		
Fleet Management	Full consolidation			Х			Non Financial Corporation - Operational Leasing		
Fondul de Garantare a Creditului Rural IFN SA	Equity method					х	Other Financial Corporation		
BCR Social Finance	Equity method					х	Other Financial Corporation		

During 2020, the Bank entered with other investors into a transaction involving the share capital increase of CIT One S.R.L. ("CIT One"), pursuant to which the other investors became shareholders in CIT One, with equal shareholding of 33.33%.

Consideration of consolidation methods for the calculation of consolidated own funds according to the CRR

The amounts that are used as the basis for the calculation of own funds are based on the definition of the regulatory scope of consolidation pursuant to the CRR. Amounts that relate to the own share as well as to the minority interest in fully consolidated entities are therefore determined based on the regulatory scope of consolidation according to CRR.

Consideration of non-consolidated financial sector entities and deferred tax assets that rely on future profitability arising from temporary differences within the calculation of consolidated common equity tier 1 of BCR Group

Carrying amounts representing the investments in financial sector entities have to be deducted from the own funds based on the requirements as defined in Articles 36 (1) (h), Article 45 and Article 46 CRR for non-significant investments and Articles 36 (1) (i) CRR, Article 43 and Article 45 CRR for significant investments. For these purposes, non-significant investments are defined as investments in financial sector entities in which the participation is equal to or less than 10% of common equity tier 1 (CET 1) of the relevant financial sector entities, while significant investments are defined as investments that are above 10% of the common equity (CET 1) of the relevant financial sector entities.

To determine the participation in the relevant financial sector entities, these participations are calculated based on the direct, indirect and synthetic holdings in the relevant entities.

According to Article 46 (1) CRR, holdings in non-significant investments have to be deducted only if the total amount for such investments exceeds a defined threshold of 10% in relation to CET1 of the reporting institution. Deduction shall be applied to the



amount that exceeds the 10% threshold. Amounts that are equal to or less than 10% of the CET1 of the reporting institution are considered within the RWAs based on the requirements

For the deduction of significant investments in the CET1 of financial sector entities, a threshold is defined in Article 48 (2) CRR. According to Article 48 (2) CRR, significant investments in the CET1 of financial sector entities shall only be deducted if they exceed 10% of the CET1 of the reporting institution. If the 10% threshold is exceeded, the deduction is limited to the amount by which the defined threshold is exceeded. The remaining amount has to be considered within the calculation of the RWAs. The risk weight (RW) is defined at 250% according to Article 48 (4) CRR.

A 10% threshold related to the CET1 capital of the reporting institution is applied for deferred tax assets that rely on future profitability arising from temporary differences according to Article 48 (3) CRR. In case the amount for deferred tax assets that rely on future profitability that arise from temporary differences exceeds the threshold of 10% of CET1 of the reporting institution the exceeding amount has to be deducted from the CET1 of the reporting institution. The amount that is equal to or less than the threshold as defined in Article 48 (3) CRR has to be considered within the calculation of RWAs with a 250% RW according to Article 48 (4) CRR.

In addition to the aforementioned thresholds, a combined threshold for the deduction of significant investments according to Article 36 (1) (i) CRR and for deferred tax assets that rely on future profitability and arise from temporary differences according to Article 36 (1) (c) CRR as well as according to Article 38 CRR is defined in Article 48 (2) CRR. The combined threshold according to Article 48 (2) CRR is defined at 17.65% of the CET1 of the reporting institution. If the threshold is exceeded, the exceeding amount has to be deducted from the CET1 of the reporting institution. The remaining amount has to be considered within the RWAs. A 250% RW shall be applied for the amount not exceeding the 17.65% threshold according to Article 48 (4) CRR.

At the reporting date, September 30th 2020 BCR Group did not exceed any of the aforementioned thresholds. Hence, direct, indirect and synthetic investments in financial sector entities were not deducted from the consolidated own funds of BCR Group and therefore are considered in RWAs.

Please find below, the information relating to own funds required to be disclosed:



3 Own funds disclosure template

		Sep-20	Regulation (EU) No 575/2013 Article Reference
in RO	N thousands		
Com	mon equity Tier 1 (CET1) capital: instruments and reserves		
1	Common equity Tier 1 (CET1) capital: instruments and reserves	3,348,048	26 (1), 27, 28, 29
	of which: ordinary shares	3,348,048	EBA list 26 (3
2	Retained earnings	3,478,118	26 (1) (c)
3	Accumulated other comprehensive income (and any other reserves)	1,272,165	26 (1
	mon Equity Tier 1 (CET1) capital before regulatory adjustments	8,098,331	
	mon Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	(9,287)	34, 105
8	Intangible assets (net of related tax liability) (negative amount)	(320,995)	36 (1) (b), 37
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	(3)	33 (1) (b) (c
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(608,354)	
29	Common Equity Tier 1 (CET1) capital	7,489,977	
	tional Tier 1 (AT1) capital: instruments		
36	Additional Tier 1 (AT1) capital before regulatory adjustments	-	
	tional Tier 1 (AT1) capital: regulatory adjustments		
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	
	ess of deduction from AT1 items over AT1		
44	Additional Tier 1 (AT1) capital		
45	Tier 1 capital (T1 = CET1 + AT1)	7,489,977	
	2 (T2) capital: instruments and provisions		
46	Capital instruments and the related share premium accounts	286,162	
51	Tier 2 (T2) capital before regulatory adjustment	286,162	
	2 (T2) capital: regulatory adjustments		
57	Total regulatory adjustments to Tier 2 (T2) capital	-	
58	Tier 2 (T2) capital	286,162	
59	Total capital (TC = T1 + T2)	7,776,138	20 (0) 25 20 26
60	Total risk-weighted assets	38,962,289	92 (3), 95, 96, 98
_	tal ratios and buffers	40.000/	00 (0) (-
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	19.22% 19.22%	() ()
62	Tier 1 (as a percentage of total risk exposure amount		- () (-
63	Total capital (as a percentage of total risk exposure amount)	19.96%	92 (2) (c)
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements plus a systemic risk buffer, plus systemically important institution buffer expressed as a percentage of total risk exposure amount)	9.00%	CRD 128, 129, 140
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical buffer requirement	-	
67	of which: systemic risk buffer requirement	1.00%	
67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	2.00%	CRD 131
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	11.96%	CRD 128
Amo	unts below the thresholds for deduction (before risk-weighting)		
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	84,227	36 (1) (h), 45, 46, 472 (10) 56 (c), 59, 60, 475 (4), 66 (c) 69, 70
73	Direct and indirect holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	38,713	36 (1) (i), 45, 48
75	Deferred tax assets arising from temporary difference (amount below 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met)	224,411	36 (1) (c), 38, 48

Note: Row 68 is calculated as the CET 1 capital less any CET 1 items used to meet Tier 1 and Total capital requirements; this is before consideration of Pillar 2 SREP requirements.



4 Template on the comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs

		а	b	С	d	е
		T	T-1	T-2	T-3	T-4
	Available capital (amount		, _	1 2	, 3	
1	CET1 capital	7,489,977	7,574,758	7,682,490	7,727,216	7,528,027
2	CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,489,977	7,574,758	7,682,490	7,727,216	7,528,027
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied	7,489,977	7,574,758	7,682,490	7,727,216	7,528,027
3	Tier 1 capital	7,489,977	7,574,758	7,682,490	7,727,216	7,528,027
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,489,977	7,574,758	7,682,490	7,727,216	7,528,027
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	7,489,977	7,574,758	7,682,490	7,727,216	7,528,027
5	Total capital	7,776,138	7,912,977	8,072,433	8,165,833	8,016,719
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,776,138	7,912,977	8,072,433	8,165,833	8,016,719
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	7,776,138	7,912,977	8,072,433	8,165,833	8,016,719
	Risk-weighted assets (amou	unts)				
7	Total risk-weighted assets	38,962,289	38,548,259	43,746,497	40,493,037	40,698,594
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
	Capital ratios					
9	CET1 (as a percentage of risk exposure amount)	19.22%	19.65%	17.56%	19.08%	18.50%
10	CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.22%	19.65%	17.56%	19.08%	18.50%
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	19.22%	19.65%	17.56%	19.08%	18.50%
11	Tier 1 (as a percentage of risk exposure amount)	19.22%	19.65%	17.56%	19.08%	18.50%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.22%	19.65%	17.56%	19.08%	18.50%
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	19.22%	19.65%	17.56%	19.08%	18.50%
13	Total capital (as a percentage of risk exposure amount)	19.96%	20.53%	18.45%	20.17%	19.70%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.96%	20.53%	18.45%	20.17%	19.70%
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	19.96%	20.53%	18.45%	20.17%	19.70%
	Leverage ratio					
15	Leverage ratio total exposure measure	82,255,261	80,248,442	82,406,156	78,767,340	75,760,566
16		0.440/	9.44%	9.32%	9.81%	9.94%
	Leverage ratio	9.11%	J. T T / U	0.0270		
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair	9.11%		9.32%	9.81%	9.94%

BCR Group does not apply the transitory measures described in article 473a relate to IFRS 9. The full impact related to credit risk provisions calculated in accordance with IFRS 9 requirements is considered in the calculation of own funds, capital ratio and leverage ratio.

BCR Group does not apply the transitory measures described in article 468 related to unrealized gains and losses for financial assets measured at fair value through other comprehensive income. The full impact related to this is considered in the calculation of own funds, capital ratios and leverage ratio.



4 Capital Requirements

DISCLOSURE REQUIREMENTS COVERED: ART. 438 (c) (e) (f) CRR

BCR Group computes its regulatory capital adequacy ratio based on Regulation No. 575/2013 of the European Parliament and of the Council of June 2013 on prudential requirements for credit institutions and investment firms, on a monthly basis for the Bank Standalone, as well as quarterly at BCR Group level (IFRS standards).

The regulatory capital requirements computed as of September 30th 2020, for the credit risk, market risk and operational risk were as follows:

4 Template EU OV1 - Overview of RWAs

RON thousands	RWA	RWAs		Minimum capital requirements		
NON thousands		30.09.2020	30.06.2020	30.09.2020	30.06.2020	
	1 Credit risk (excluding CCR)	30,435,548	30,703,266	2,434,844	2,456,261	
Article 438(c)(d)	2 Of which the standardised approach	30,435,548	30,703,266	2,434,844	2,456,261	
Article 438(c)(d)	3 Of which the foundation IRB (FIRB) approach					
Article 438(c)(d)	4 Of which the advanced IRB (AIRB) approach					
Article 438(d)	Of which equity IRB under the simple risk-weighted approach or the IMA					
Article 107, Article 438(c)(d)	6 CCR	437,583	109,014	35,007	8,721	
Article 438(c)(d)	7 Of which mark to market	74,372	77,362	5,950	6,189	
Article 438(c)(d)	8 Of which original exposure					
	9 Of which the standardised approach	335,971	12,961	26,878	1,037	
	10 Of which internal model method (IMM)					
Article 438(c)(d)	Of which risk exposure amount for contributions to the default fund of a CCP					
Article 438(c)(d)	12 Of which CVA	27,239	18,691	2,179	1,495	
Article 438(e)	13 Settlement risk					
Article 449(o)(i)	14 Securitisation exposures in the banking book (after the cap)					
_	15 Of which IRB approach					
	16 Of which IRB supervisory formula approach (SFA)					
	17 Of which internal assessment approach (IAA)					
	18 Of which standardised approach					
Article 438 (e)	19 Market risk	244,407	182,476	19,553	14,598	
	20 Of which the standardised approach	244,407	182,476	19,553	14,598	
	21 Of which IMA					
Article 438(e)	22 Large exposures					
Article 438(f)	23 Operational risk	7,844,750	7,553,502	627,580	604,280	
	24 Of which basic indicator approach	352,824	352,824	28,226	28,226	
	25 Of which standardised approach					
	26 Of which advanced measurement approach	7,491,926	7,200,678	599,354	576,054	
Article 437(2), Article 48 and Article 60	Amounts below the thresholds for deduction (subject to 250% risk weight)					
Article 500	28 Floor adjustment					
	29 Total	38,962,289	38,548,259	3,116,983	3,083,861	

As of September 30th 2020, the total RWA for BCR Group was 38,962,289 thousand RON, with 414,030 thousands RON higher as compared to June 30th 2020 (38,548,259 thousands RON). The increase in credit risk RWA (including CCR) by 60,852 thousands RON was mainly driven by the increase in the volume of Reverse Repo transactions.



RWA equivalent for market risk increased with 61,931 thousand RON due to increase in trading debt instruments position.

RWA equivalent for operational risk increased with 291,248 thousand RON mainly due to registration of Covid-19 losses in September (according with EBA requirements).



5 Leverage

DISCLOSURE REQUIREMENTS COVERED: ART. 451 CRR

The leverage ratio represents the relationship between core capital (Tier 1) and leverage exposure according to Article 429 CRR. Essentially, the leverage exposure represents the sum of on- and off-balance sheet positions considering valuation and risk adjustments as defined within the CRR.

The scope of consolidation for financial purposes is the same as the regulatory scope of consolidation used for determine the leverage ratio.

Based on the requirements defined by the European Bank Authority as per EBA/GL/2016/11, version 2, the information listed below must be provided quarterly:

- Amount of Tier 1 capital used as a numerator, which amounts to 7,489,977thousands RON (row 20, with the specification required in row EU-23);
- Amount of total exposure used as a denominator, which amounts to 82,255,261 thousands RON (row 21);
- Resulting leverage ratio, which is equal to 9.1% (row 22).

5 LRCom: Leverage ratio common disclosure

RON thousands

Capital and total exposures	
20 Tier 1 capital	7,489,977
21 Total leverage ratio exposures (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	82,255,261
Leverage ratio	
22 Leverage ratio	9.11%
Choice on transitional arrangements and amount of derecognised fiduciary items	
EU-23 Choice on transitional arrangements for the definition of the capital measure	Fully phased-in
EU-24 Amount of derecognised fiduciary items in accordance with Article 429(11) of Regulation (EU) NO 575/2013	



6 Abbreviations

AIRB Advanced Internal Rating-based Approach

AMA Advanced Measurement Approach

AT1 Additional Tier 1 capital

CCP Central Counterparty

CCR Counterparty Credit Risk

CET1 Common Equity Tier-1

CRR Capital Requirement Regulation

CRD Capital Requirement Directive

CVA Credit Valuation Adjustment

EBA European Banking Authority

ECAI External Credit Assessment Institution

EU European Union

FIRB Foundation Internal Rating-based Approach

GL Guideline

IAA Internal Assessment Approach

IFRS International Financial Reporting Standards

IMA Internal Model Approach

IAA Internal Assessment Approach

IMM Internal Model Method

IRB Internal Rating-based Approach

NBR National Bank of Romania

RW Risk Weight

RWA Risk Weighted Assets

T1 Tier 1 capital
T2 Tier 2 capital
LR Leverage Ratio