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Wednesday, 7 May 2025

ASX ANNOUNCEMENT

NAB 2025 Half Year Pillar 3 Report

National Australia Bank Limited (NAB) today released its 2025 Half Year Pillar 3 Report, as required under the Australian Prudential Regulation Authority Prudential Standard APS 330 *Public Disclosure*.

The report is attached to this announcement and available at:

<http://www.nab.com.au/about-us/shareholder-centre/regulatory-disclosures>

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The release of this announcement was authorised by Shaun Dooley, Group Chief Financial Officer.

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Pillar 3 Report — 2025

as at 31 March 2025

Incorporating the requirements of APS 330

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Introduction

National Australia Bank Limited (NAB) is an authorised deposit-taking institution (ADI) subject to regulation by the Australian Prudential Regulation Authority (APRA) under the authority of the *Banking Act 1959* (Cth). This document has been prepared in accordance with APRA Prudential Standard APS 330 *Public Disclosure*, which requires disclosure of key prudential information to the market to contribute to the transparency of financial markets and to enhance market discipline.

This document has also been prepared in accordance with the Group External Reporting Policy, which has been adopted by the Board to assist in discharging its oversight of the integrity of external reporting. The Group External Reporting Policy sets out the approach the Group, being NAB and its controlled entities, takes to managing compliance with APS 330, as well as other Australian statutory and regulatory external reporting obligations.

This is the first disclosure prepared under the revised APS 330 which took effect on 1 January 2025. The revised APS 330 requires prudential disclosures to be made as set out in the standard made by the Basel Committee on Banking Supervision (BCBS) titled *Disclosure Requirements*, as exists from time to time, subject to modifications made by APRA specified in Attachment A of APS 330.

While the BCBS *Disclosure Requirements* standard requires limited comparative period disclosures, it is NAB's intention to generally provide comparative period disclosures to enhance the useability of this report. The reporting frequency, as set out in the disclosure requirements index, drives the comparative period to accompany the current period disclosure. Comparative period disclosures have been provided where practicable in this first disclosure since the revised APS 330 took effect.

Amounts are presented in Australian dollars unless otherwise stated, and have been rounded to the nearest million dollars (\$m) except where indicated.

Quantitative information contained in this document is available in Microsoft Excel format at nab.com.au/about-us/shareholder-centre/regulatory-disclosures.

Capital adequacy methodologies

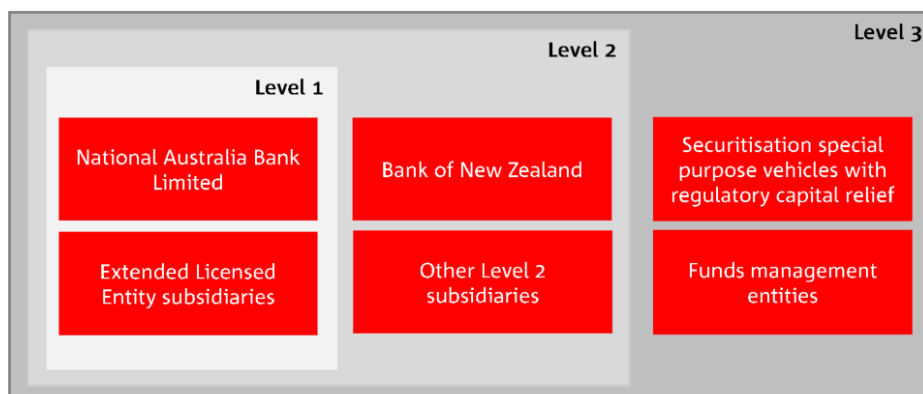
The Group uses the following approaches to measure capital adequacy.

Credit risk	Operational risk	Non-traded market risk	Traded market risk
Internal ratings-based (IRB) approach ⁽¹⁾	Standardised measurement approach (SMA)	Internal model approach (IMA)	Internal model approach (IMA) and standard method

(1) The Group has received IRB accreditation from APRA and applies the advanced IRB (A-IRB), foundation IRB (F-IRB), supervisory slotting and standardised approaches to different portfolios. Risk-weighted assets (RWA) and expected loss for the Group's banking subsidiary regulated by the Reserve Bank of New Zealand (RBNZ), Bank of New Zealand (BNZ), are calculated using RBNZ prudential requirements, with the exception of scaling factors which are applied under APRA requirements. BNZ has received internal ratings-based accreditation from the RBNZ and applies the internal ratings-based approach, supervisory slotting approach and standardised approach to different portfolios.

Scope of application

APRA measures the Group's capital adequacy by assessing financial strength at three levels as illustrated below.



Level 1 comprises NAB and its subsidiaries that have been approved by APRA as part of its Extended Licensed Entity.

Level 2 comprises NAB and the entities it controls, excluding securitisation special purpose vehicles to which assets have been transferred in accordance with the requirements for regulatory capital relief in APS 120 *Securitisation* and funds management entities. Level 2 controlled entities include BNZ, National Australia Bank Europe S.A. and other financial entities such as broking, wealth advisory and leasing companies.

Level 3 comprises the consolidation of NAB and all of its subsidiaries.

This report applies to the Level 2 Group, headed by NAB, unless otherwise stated.

Introduction (cont.)

Regulatory reform

Key reforms that may affect the Group's capital and liquidity include:

Increased loss-absorbing capacity for ADIs

Under their loss-absorbing capacity framework, APRA has required domestic systemically important banks (D-SIBs) to hold incremental Total capital equal to 3% of RWA since 1 January 2024. The requirement increases by 1.5% (to a total of 4.5%) of RWA on 1 January 2026. The 3% of RWA Total capital requirement has been met.

Additional Tier 1 capital changes

In December 2024, APRA confirmed it will phase out the use of Additional Tier 1 capital from 1 January 2027. Under APRA's approach, large, internationally active banks including NAB will replace 1.5% Additional Tier 1 capital with 0.25% Common Equity Tier 1 (CET1) capital and 1.25% Tier 2 capital. Until 2032, existing Additional Tier 1 capital instruments will be eligible to be included as Tier 2 capital until an instrument's first call date. This change is intended to ensure that the capital strength of the Australian banking system operates more effectively in a stress scenario. APRA plans to finalise amendments to prudential standards to reflect the change by the end of 2025.

Revisions to the capital framework

APRA's revisions to APS 117 *Capital Adequacy: Interest Rate Risk in the Banking Book* will come into effect on 1 October 2025. Internal models used in the calculation of IRRBB capital will require re-accreditation by APRA.

APRA expects Australian banks to continue building preparedness for the BCBS' Fundamental Review of the Trading Book regulatory standards ahead of the release of draft standards. There is no timeline provided for when these draft standards will be released.

Reserve Bank of New Zealand capital review

In December 2019, the RBNZ finalised its review of the capital adequacy framework. The RBNZ amendments included an increase in the Tier 1 capital requirement to 16% of RWA, and an increase in the Total capital requirement to 18% of RWA, to be phased in by 2028.

In March 2025, the RBNZ announced its intention to conduct a review of key capital settings.

Liquidity requirements

APRA will conduct a comprehensive review of APS 210 *Liquidity*, with industry engagement expected to commence this calendar year.

Overview of key metrics and RWA

KM1: Key metrics

The following table provides an overview of prudential regulatory metrics as at 31 March 2025 and for the four previous quarter-end periods.

Commentary on significant changes in these metrics is in the relevant sections of this report.

		31 Mar 25	31 Dec 24	As at 30 Sep 24	30 Jun 24	31 Mar 24
Available capital (amounts)						
1	CET1	51,236	49,977	51,139	53,686	52,543
2	Tier 1	60,826	59,567	60,728	63,276	61,133
3	Total capital	89,622	86,823	86,602	89,696	87,667
RWA (amounts)						
4	Total RWA	426,445	429,128	413,946	425,543	432,553
4a	Total RWA (pre-floor) ⁽¹⁾	425,189	429,128	413,946	425,543	432,553
Risk-based capital ratios as a percentage of RWA (Level 2 Group)						
5	CET1 capital ratio (%)	12.01	11.65	12.35	12.62	12.15
5b	CET1 capital ratio (%) (pre-floor ratio) ⁽¹⁾	12.05	11.65	12.35	12.62	12.15
6	Tier 1 capital ratio (%)	14.26	13.88	14.67	14.87	14.13
6b	Tier 1 capital ratio (%) (pre-floor ratio) ⁽¹⁾	14.31	13.88	14.67	14.87	14.13
7	Total capital ratio (%)	21.02	20.23	20.92	21.08	20.27
7b	Total capital ratio (%) (pre-floor ratio) ⁽¹⁾	21.08	20.23	20.92	21.08	20.27
Risk-based capital ratios as a percentage of RWA (Level 1 Group)						
-	CET1 capital ratio (%)	11.84	11.42	12.08	12.54	11.85
-	Tier 1 capital ratio (%)	14.33	13.89	14.65	15.03	14.05
-	Total capital ratio (%)	21.74	20.81	21.49	21.80	20.76
Additional CET1 buffer requirements as a percentage of RWA						
8	Capital conservation buffer requirement (%)	4.75	4.75	4.75	4.75	4.75
9	Countercyclical capital buffer requirement (%)	0.85	0.85	0.85	0.85	0.84
10	Bank global systemically important bank (G-SIB) and/or D-SIB additional requirements (%)	-	-	-	-	-
11	Total of bank CET1 specific buffer requirements (%) (row 8 + row 9 + row 10)	5.60	5.60	5.60	5.60	5.59
12	CET1 available after meeting the bank's minimum capital requirements (%) ⁽²⁾	7.51	7.15	7.85	8.12	7.65
Leverage ratio						
13	Total leverage ratio exposure measure	1,210,737	1,231,826	1,191,855	1,188,241	1,198,406
14c	Leverage ratio (%) (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values for securities financing transaction (SFT) assets	5.02	4.84	5.10	5.33	5.10
Liquidity coverage ratio (LCR)						
15	Total high-quality liquid assets (HQLA) ⁽³⁾	212,309	213,659	214,662	207,855	207,086
16	Total net cash outflows ⁽³⁾	152,496	154,236	156,717	151,357	149,313
17	LCR (%) ⁽³⁾	139	139	137	137	139
Net stable funding ratio (NSFR)						
18	Total available stable funding (ASF)	703,467	695,170	677,657	673,113	671,023
19	Total required stable funding (RSF)	592,468	589,750	577,568	579,086	568,002
20	NSFR (%)	119	118	117	116	118

(1) The capital floor applies at the aggregate RWA level and requires IRB ADIs to apply the higher of RWA prior to application of the floor modelled under approval from APRA and 72.5% of RWA calculated under the full standardised approach.

(2) CET1 capital less the ratio of RWA of any CET1 capital used to meet minimum CET1, Tier 1 and Total capital requirements of 4.5%, 6% and 8%, respectively, as outlined in APS 110 *Capital Adequacy* paragraph 24.

(3) Simple average of daily outcomes, excluding non-business days, during the quarter.

Overview of key metrics and RWA (cont.)

OV1: Overview of RWA

The following table provides RWA for each risk type and approach as at 31 March 2025 and for the two previous quarter-end periods.

March 2025 v September 2024

Total RWA increased by \$12.5 billion or 3.0%. The most significant driver was a \$9.2 billion or 2.8% increase in credit RWA (excluding counterparty credit risk), mainly due to lending growth, mostly in corporate (including small and medium-sized enterprises (SME)) and residential mortgages. In addition:

- There was a \$1.9 billion or 5.2% increase in operational risk RWA, following update of the business indicator component of operational risk capital as part of 31 December reporting following finalisation of the year-end financial report. Further detail is provided in Section 9 *Operational risk*.
- A floor adjustment of \$1.3 billion was applied as at 31 March 2025 following a 4.5% increase in RWA under the full standardised approach compared to a 2.7% increase in RWA prior to application of the floor. Refer to CMS1: *Comparison of modelled and standardised RWA at risk level* for further detail.

March 2025 v December 2024

Total RWA decreased by \$2.7 billion or 0.6%. A decrease in the exposure at default (EaD) for derivatives, in particular foreign exchange derivatives, was the main driver of both a \$2.1 billion or 14.7% decrease in RWA for counterparty credit risk and a \$1.7 billion or 27.7% decrease in RWA for the credit valuation adjustment. These decreases were partially offset by the application of a \$1.3 billion floor adjustment as at 31 March 2025.

		As at			
		31 Mar 25	31 Dec 24	30 Sep 24	31 Mar 25
		RWA	RWA	RWA	Minimum capital requirements ⁽¹⁾
		\$m	\$m	\$m	\$m
1	Credit risk (excluding counterparty credit risk (CCR))	338,419	338,184	329,177	27,153
2	of which: standardised approach (SA)	21,488	22,971	23,163	1,724
3	of which: F-IRB approach	34,749	34,953	33,091	2,788
4	of which: supervisory slotting approach	9,477	9,265	9,556	760
5	of which: A-IRB approach	272,705	270,995	263,367	21,881
6	Counterparty credit risk	11,953	14,015	11,291	960
7	of which: standardised approach for CCR	9,954	11,559	9,534	799
9	of which: other CCR ⁽²⁾	1,999	2,456	1,757	161
10	Credit valuation adjustment	4,570	6,318	5,054	367
15	Settlement risk	-	-	-	-
16	Securitisation exposures in banking book	5,544	5,596	5,369	445
18	of which: securitisation external ratings-based approach (SEC-ERBA)	1,495	1,605	1,706	120
19	of which: securitisation supervisory formula approach	4,049	3,991	3,663	325
20	Market risk	12,094	12,863	11,427	970
21	of which: standard method	776	618	733	62
22	of which: IMA	11,318	12,245	10,694	908
24	Operational risk	37,985	37,985	36,102	3,048
-	Interest rate risk in the banking book	14,624	14,167	15,526	1,173
26	Output floor applied	72.5%	72.5%	72.5%	
27	Floor adjustment ⁽³⁾	1,256	-	-	
29	Total	426,445	429,128	413,946	34,116

(1) The total is calculated as total RWA multiplied by the minimum prudential capital requirement for a Total capital ratio of 8.0% outlined in APS 110 paragraph 24, and is attributed to the RWA categories on a pro-rata basis.

(2) CCR not subject to the standardised approach comprises SFTs, BNZ derivatives under the current exposure method and central counterparty (CCP) margin and default fund contributions.

(3) The description of row 27 has been modified from that set out in the BCBS *Disclosure Requirements* standard as APRA's capital floor requirement does not have a transitional cap.

Overview of key metrics and RWA (cont.)

Overview of exposure at default and RWA by asset class

The table on the following page provides a summary of EaD and RWA by asset class. Amounts have been broken down into those subject to the credit risk and counterparty credit risk frameworks. The nature of exposures in each asset class is outlined below.

This disclosure has been included in this report to provide a breakdown of total EaD, as EaD disclosures in the BCBS *Disclosure Requirements* standard are presented across a number of tables and not aggregated in a single disclosure.

Asset class	Description
Subject to the A-IRB approach	
Corporate (including SME)	Corporations, partnerships, proprietorships, public sector entities and any other credit exposure not elsewhere classified.
Retail SME	Non-complex exposures to small-business customers managed as part of a portfolio for risk management purposes where: <ul style="list-style-type: none"> the consolidated annual revenue of the borrower is less than \$75 million, and the total small-business-related exposure to the borrower is less than \$1.5 million.
Residential mortgage	Exposures that are partially or fully secured by residential properties, managed in a similar manner to other retail exposures, and not for business purposes. This excludes non-standard mortgages.
Qualifying revolving retail	Revolving exposures to individuals less than \$100,000, which are unsecured, unconditionally cancellable and are not for business purposes.
Other retail	Retail exposures other than residential mortgage and qualifying revolving retail, including personal loan products, overdrafts and overdrawn transaction account exposures.
Subject to the F-IRB approach	
Corporate	Corporations, partnerships, proprietorships and public sector entities with consolidated annual revenue greater than \$750 million.
Sovereign	<ul style="list-style-type: none"> Australian and overseas central and subnational governments. A subnational government is a government of a geographically defined part of a state which has powers to raise revenue and borrow money. The Reserve Bank of Australia (RBA) and overseas central banks. Multilateral development banks or institutions eligible for a zero per cent risk-weight.
Financial institution	Entities whose main business includes management of financial assets, lending, factoring, leasing, provision of credit enhancements, securitisation (excluding securitisation exposures subject to the requirements of APS 120), investments, financial custody, CCP services (excluding qualifying central counterparty (QCCP) exposures) and proprietary trading.
Specialised lending	Project finance exposures, in which revenues generated by a single project are both the primary source of repayment and security for the exposure.
Subject to the standardised approach	
Corporate (including SME)	Regulatory prescribed portfolios, such as QCCPs and margin lending, and corporate exposures in portfolios where the standardised approach is applied.
Residential mortgage	Non-standard mortgages and residential mortgages in portfolios where the standardised approach is applied, such as the Citi consumer business.
Other retail	Regulatory prescribed portfolios, such as margin lending, and other retail exposures in portfolios where the standardised approach is applied, such as the Citi consumer business.
Other	Cash items in the process of collection, investment in premises and other fixed assets, and all other exposures.
RBNZ regulated banking subsidiary	BNZ exposures calculated using RBNZ prudential requirements, with the exception of scaling factors which are applied under APRA requirements. APS 330 requires these exposures to be disclosed separately as an asset class.

Overview of key metrics and RWA (cont.)

As at 31 Mar 25

	EaD post-CCF and post-CRM ⁽¹⁾			RWA		
	Credit risk	Counterparty credit risk	Total	Credit risk	Counterparty credit risk	Total
	\$m	\$m	\$m	\$m	\$m	\$m
Subject to A-IRB approach						
Corporate (including SME)	217,461	3,244	220,705	106,229	1,653	107,882
Retail SME	25,564	-	25,564	10,817	-	10,817
Residential mortgage	420,020	-	420,020	109,020	-	109,020
Qualifying revolving retail	9,316	-	9,316	2,705	-	2,705
Other retail	1,760	-	1,760	1,940	-	1,940
Subject to F-IRB approach						
Corporate	31,381	4,764	36,145	17,417	3,397	20,814
Sovereign	147,002	2,101	149,103	2,282	24	2,306
Financial institution	52,415	21,384	73,799	15,050	5,670	20,720
Total IRB approach	904,919	31,493	936,412	265,460	10,744	276,204
Specialised lending	3,976	144	4,120	2,934	107	3,041
Subject to standardised approach						
Corporate (including SME)	8,807	2,498	11,305	6,351	247	6,598
Residential mortgage	6,638	-	6,638	2,826	-	2,826
Other retail	8,476	-	8,476	6,009	-	6,009
Other	5,350	-	5,350	4,117	-	4,117
Total standardised approach	29,271	2,498	31,769	19,303	247	19,550
RBNZ regulated banking subsidiary	121,848	3,485	125,333	50,722	855	51,577
Credit valuation adjustment						4,570
Settlement risk						-
Securitisation exposures in banking book			31,094			5,544
Total credit risk	1,060,014	37,620	1,128,728	338,419	11,953	360,486
Market risk						12,094
Operational risk						37,985
Interest rate risk in the banking book						14,624
Floor adjustment						1,256
Total	1,060,014	37,620	1,128,728	338,419	11,953	426,445

(1) Credit conversion factor (CCF) and credit risk mitigation (CRM).

Overview of key metrics and RWA (cont.)

As at 30 Sep 24

	EaD post-CCF and post-CRM			RWA		
	Credit risk	Counterparty credit risk	Total	Credit risk	Counterparty credit risk	Total
	\$m	\$m	\$m	\$m	\$m	\$m
Subject to A-IRB approach						
Corporate (including SME)	207,951	2,981	210,932	102,509	1,580	104,089
Retail SME	24,746	-	24,746	10,327	-	10,327
Residential mortgage	410,718	-	410,718	104,004	-	104,004
Qualifying revolving retail	9,273	-	9,273	2,682	-	2,682
Other retail	1,752	-	1,752	1,922	-	1,922
Subject to F-IRB approach						
Corporate	31,513	6,213	37,726	17,475	3,475	20,950
Sovereign	160,130	1,978	162,108	1,599	18	1,617
Financial institution	47,604	17,397	65,001	14,017	5,051	19,068
Total IRB approach	893,687	28,569	922,256	254,535	10,124	264,659
Specialised lending	3,059	129	3,188	2,514	95	2,609
Subject to standardised approach						
Corporate (including SME)	8,571	3,726	12,297	7,421	272	7,693
Residential mortgage	7,545	-	7,545	3,212	-	3,212
Other retail	8,510	-	8,510	6,041	-	6,041
Other	6,406	-	6,406	4,355	-	4,355
Total standardised approach	31,032	3,726	34,758	21,029	272	21,301
RBNZ regulated banking subsidiary	120,799	3,810	124,609	51,099	800	51,899
Credit valuation adjustment						5,054
Settlement risk						-
Securitisation exposures in banking book			31,908			5,369
Total credit risk	1,048,577	36,234	1,116,719	329,177	11,291	350,891
Market risk						11,427
Operational risk						36,102
Interest rate risk in the banking book						15,526
Floor adjustment						-
Total	1,048,577	36,234	1,116,719	329,177	11,291	413,946

Overview of key metrics and RWA (cont.)

CMS1: Comparison of modelled and standardised RWA at risk level

The following table provides a comparison at risk level of RWA prior to application of the floor modelled under approval from APRA, and RWA calculated under the full standardised approach.

March 2025 v September 2024

RWA prior to application of the floor increased by \$11.2 billion or 2.7% as outlined in OV1: *Overview of RWA*, whereas RWA under the full standardised approach increased by \$25.3 billion or 4.5%. These movements resulted in a floor adjustment of \$1.3 billion as at 31 March 2025.

The increase in RWA under the full standardised approach was \$14.1 billion more than the increase in pre-floor RWA, mainly related to credit RWA (excluding counterparty credit risk), which is broken down by asset class in CMS2: *Comparison of modelled and standardised RWA for credit risk at asset class level*.

Lending growth, mostly in corporate (including SME), resulted in a greater increase in full standardised credit RWA (excluding counterparty credit risk) compared to pre-floor RWA due to higher risk-weights under the standardised approach. In addition, data and methodology refinements resulted in an increase in credit RWA under the full standardised approach, while the release of certain RWA overlay adjustments resulted in a decrease in pre-floor RWA.

As at 31 Mar 25					
	RWA for modelled approaches that have supervisory approval to be used	RWA for portfolios where standardised approaches are used	Pre-floor RWA	RWA calculated using full standardised approach	
	\$m	\$m	\$m	\$m	
1	Credit risk (excluding counterparty credit risk)	316,931	21,488	338,419	507,124
2	Counterparty credit risk	11,498	455	11,953	20,883
3	Credit valuation adjustment		4,570	4,570	4,570
4	Securitisation exposures in the banking book		5,544	5,544	5,544
5	Market risk	11,318	776	12,094	12,094
6	Operational risk		37,985	37,985	37,985
-	Interest rate risk in the banking book	14,624	-	14,624	n/a
7	Residual RWA		-	-	-
8	Total	354,371	70,818	425,189	588,200

Capital floor at 72.5% of RWA calculated using full standardised approach

426,445

RWA prior to application of floor

425,189

Floor adjustment

1,256

As at 30 Sep 24					
	RWA for modelled approaches that have supervisory approval to be used	RWA for portfolios where standardised approaches are used	Pre-floor RWA	RWA calculated using full standardised approach	
	\$m	\$m	\$m	\$m	
1	Credit risk (excluding counterparty credit risk)	306,014	23,163	329,177	486,070
2	Counterparty credit risk	10,732	559	11,291	18,838
3	Credit valuation adjustment		5,054	5,054	5,054
4	Securitisation exposures in the banking book		5,369	5,369	5,369
5	Market risk	10,694	733	11,427	11,427
6	Operational risk		36,102	36,102	36,102
-	Interest rate risk in the banking book	15,526	-	15,526	n/a
7	Residual RWA		-	-	-
8	Total	342,966	70,980	413,946	562,860

Capital floor at 72.5% of RWA calculated using full standardised approach

408,074

RWA prior to application of floor

413,946

Floor adjustment

n/a

Overview of key metrics and RWA (cont.)

CMS2: Comparison of modelled and standardised RWA for credit risk at asset class level

The following table provides a comparison at asset class level of RWA for credit risk (excluding counterparty credit risk) modelled under approval from APRA and under the full standardised approach. The table provides a breakdown by asset class of amounts in row 1 of CMS1: *Comparison of modelled and standardised RWA at risk level*. Note that:

- Columns (a) and (b) represent RWA for exposures subject to the A-IRB, F-IRB and supervisory slotting approaches.
- Columns (c) and (d) also include RWA for exposures subject to the standardised approach.

		As at 31 Mar 25			
		<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>
		RWA for modelled approaches that have supervisory approval to be used	RWA for column (a) re-computed using the standardised approach	Pre-floor RWA	RWA calculated using full standardised approach
		\$m	\$m	\$m	\$m
1	Sovereign	2,282	3,748	2,282	3,748
2	Financial institution	15,050	32,869	15,050	32,869
5	Corporate	123,646	198,924	129,997	205,275
-	of which: F-IRB approach is applied	17,417	25,535	17,417	25,535
-	of which: A-IRB approach is applied	106,229	173,389	106,229	173,389
6	Retail	124,482	176,352	133,317	185,187
-	of which: retail SME	10,817	13,917	10,817	13,917
-	of which: residential mortgage	109,020	154,929	111,846	157,755
-	of which: qualifying revolving retail	2,705	6,008	2,705	6,008
-	of which: other retail	1,940	1,498	7,949	7,507
7	Specialised lending	2,934	4,338	2,934	4,338
8	Other ⁽¹⁾	-	-	4,117	4,117
-	RBNZ regulated banking subsidiary	48,537	69,405	50,722	71,590
9	Total	316,931	485,636	338,419	507,124

(1) Consists of cash items in the process of collection, investment in premises and other fixed assets, and all other exposures.

Capital

3.1 Composition of capital

CC1: Composition of regulatory capital

The following table provides the breakdown of regulatory capital.

March 2025 v September 2024

CET1 capital increased by \$97 million or 0.2%. Retained profits (reflected in row 2) increased by \$865 million, mainly from statutory net profit attributable to owners of the Company, net of the final 2024 dividend. This was largely offset by a \$616 million decrease in contributed equity from the on-market buy-back and a \$177m increase in the deduction for other intangibles (reflected in row 9), mainly related to capitalised software. On 12 March 2025, the Group completed the on-market buy-back that was announced on 15 August 2023 and subsequently increased on 2 May 2024 to \$3.0 billion.

Additional Tier 1 capital was unchanged from 30 September 2024. Tier 2 capital (reflected in row 58) increased by \$2.9 billion or 11.3% due to new issuances and favorable foreign exchange translation impacts.

As outlined in OV1: *Overview of RWA*, RWA increased by \$12.5 billion or 3.0%

		As at		
		31 Mar 25		30 Sep 24
		\$m	Reference ⁽¹⁾	\$m
CET1 capital: instruments and reserves				
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus	36,119	p	36,581
2	Retained profits	26,108	s	25,243
3	Accumulated other comprehensive income (and other reserves)	(56)	q	(362)
6	CET1 capital before regulatory adjustments	62,171		61,462
CET1 capital: regulatory adjustments				
7	Prudent valuation adjustments	-		-
8	Goodwill (net of related tax liability)	2,070	g	2,070
9	Other intangibles other than mortgage servicing rights (MSR) (net of related tax liability)	3,621	b+h	3,444
10	Deferred tax assets (DTA) that rely on future profitability, excluding those arising from temporary differences (net of related tax liability)	83	c	105
11	Cash flow hedge reserve	140	r	(145)
12	Shortfall of provisions to expected losses	-		-
13	Securitisation gain on sale	-		-
14	Gains / (losses) due to changes in own credit risk on fair valued liabilities	(64)	t	(118)
15	Defined benefit pension fund net assets	34	d+j	33
26	National specific regulatory adjustments	5,051		4,934
-	of which: deferred tax assets not reported in row 10	2,645	e	2,675
-	of which: capitalised expenses, net of deferred fee income	1,495	a+m+o	1,400
-	of which: equity investments (adjusted for intangible component of investments)	874	f+i+k	837
28	Total regulatory adjustments to CET1 capital	10,935		10,323
29	CET1 capital	51,236		51,139
Additional Tier 1 capital: instruments				
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	9,610		9,610
31	of which: classified as equity under applicable accounting standards	-		-
32	of which: classified as liabilities under applicable accounting standards	9,610	n	9,610
36	Additional Tier 1 capital before regulatory adjustments	9,610		9,610
Additional Tier 1 capital: regulatory adjustments				
37	Investments in own Additional Tier 1 instruments ⁽²⁾	20		20
41	National specific regulatory adjustments	-		1
43	Total regulatory adjustments to Additional Tier 1 capital	20		21
44	Additional Tier 1 capital (AT1)	9,590		9,589
45	Tier 1 capital (T1 = CET1 + AT1)	60,826		60,728

(1) Reference to the balance sheet under the regulatory scope of consolidation in CC2: *Reconciliation of regulatory capital to balance sheet*.

(2) The deduction for investments in own Additional Tier 1 and Tier 2 instruments includes any unused trading limit.

Composition of capital (cont.)

		As at		
		31 Mar 25		30 Sep 24
		\$m	Reference	\$m
Tier 2 capital: instruments and provisions				
46	Directly issued qualifying Tier 2 instruments plus related stock surplus	27,428	I	24,108
50	Provisions ⁽¹⁾	1,559		1,902
51	Tier 2 capital before regulatory adjustments	28,987		26,010
Tier 2 capital: regulatory adjustments				
52	Investments in own Tier 2 instruments ⁽²⁾	75		75
56	National specific regulatory adjustments ⁽³⁾	116		61
57	Total regulatory adjustments to Tier 2 capital	191		136
58	Tier 2 capital	28,796		25,874
59	Total regulatory capital (= Tier 1 + Tier 2)	89,622		86,602
60	Total RWA	426,445		413,946
Capital adequacy ratios and buffers				
61	CET1 capital (as a percentage of RWA)	12.01%		12.35%
62	Tier 1 capital (as a percentage of RWA)	14.26%		14.67%
63	Total capital (as a percentage of RWA)	21.02%		20.92%
64	Institution-specific buffer requirement (capital conservation buffer plus countercyclical capital buffer requirements plus higher loss absorbency requirement, expressed as a percentage of RWA)⁽⁴⁾	10.10%		10.10%
65	of which: capital conservation buffer requirement	4.75%		4.75%
66	of which: bank-specific countercyclical capital buffer requirement	0.85%		0.85%
67	of which: higher loss absorbency requirement	n/a		n/a
68	CET1 capital (as a percentage of RWA) available after meeting the bank's minimum capital requirements⁽⁵⁾	7.51%		7.85%
Amounts below the thresholds for deduction (before risk-weighting)⁽⁶⁾				
72	Non-significant investments in the capital and other total loss-absorbing capacity (TLAC) liabilities of other financial entities	128		116
73	Significant investments in the common stock of financial entities	677		659
75	DTA arising from temporary differences (net of related tax liability)	2,645	e	2,675
Applicable caps on the inclusion of provisions in Tier 2 capital				
76	Provisions eligible for inclusion in Tier 2 capital in respect of exposures subject to standardised approach (prior to application of cap)	196		221
77	Cap on inclusion of provisions in Tier 2 capital under standardised approach	313		335
78	Provisions eligible for inclusion in Tier 2 capital in respect of exposures subject to IRB approach (prior to application of cap)	1,363		1,681
79	Cap for inclusion of provisions in Tier 2 capital under IRB approach	1,971		1,902

(1) Consists of provision for credit impairment held against performing exposures under the IRB approach of \$1,363 million (30 September 2024: \$1,681 million) and against performing exposures under the standardised approach of \$196 million (30 September 2024: \$221 million) as at 31 March 2025.

(2) The deduction for investments in own Additional Tier 1 and Tier 2 instruments includes any unused trading limit.

(3) Deduction for holdings of Tier 2 instruments and other TLAC liabilities of financial institutions.

(4) Comprises a minimum CET1 ratio of 4.5%, a capital conservation buffer of 4.75% of RWA and a countercyclical capital buffer (CCyB) (refer to CCyB1: *Geographical distribution of credit exposures used in the calculation of the bank-specific countercyclical capital buffer requirement*).

(5) CET1 capital less the ratio of RWA of any CET1 capital used to meet minimum CET1, Tier 1 and Total capital requirements of 4.5%, 6% and 8%, respectively, as outlined in APS 110 paragraph 24.

(6) Amounts below the thresholds for deduction under Basel III requirements are APRA specific regulatory adjustments.

Composition of capital (cont.)

CC2: Reconciliation of regulatory capital to balance sheet

The following disclosure shows the difference between the scope of consolidation of the Group's balance sheet and regulatory balance sheet for the Level 2 Group. The disclosure also shows the link between the Level 2 Group's balance sheet and amounts in CC1: *Composition of regulatory capital*.

	As at 31 Mar 25			Reference ⁽²⁾
	Balance sheet as in published financial statements	Adjustments ⁽¹⁾	Under regulatory scope of consolidation	
	\$m	\$m	\$m	
Assets				
Cash and liquid assets	1,433	-	1,433	
Due from other banks	94,865	-	94,865	
Collateral placed	6,971	-	6,971	
Trading assets	153,947	-	153,947	
Derivative assets	24,243	1	24,244	
Debt instruments	44,597	-	44,597	
Other financial assets	764	-	764	
Loans and advances	750,821	(2,849)	747,972	
of which: capitalised expenses, net of deferred fee income	1,316	-	1,316	a
Current tax assets	39	-	39	
Due from controlled entities	-	18	18	
Deferred tax assets (DTA)	3,022	-	3,022	
of which: DTA related to other intangibles other than mortgage-servicing rights	320	-	320	b
of which: DTA that rely on future profitability	83	-	83	c
of which: deferred tax liability related to defined benefit pension fund assets	(15)	-	(15)	d
of which: deferred tax liability related to the cash flow hedge reserve	(28)	-	(28)	
of which: DTA related to losses due to changes in own credit risk on fair valued liabilities	17	-	17	
of which: DTA not included in the above categories	2,645	-	2,645	e
Property, plant and equipment	2,725	-	2,725	
Investments in controlled entities	-	10	10	f
Goodwill and other intangible assets	5,371	-	5,371	
of which: goodwill	2,070	-	2,070	g
of which: other intangibles other than mortgage-servicing rights	3,301	-	3,301	h
Assets held for sale ⁽³⁾	243	-	243	i
Other assets	6,598	-	6,598	
of which: defined benefit pension fund assets	49	-	49	j
of which: equity investments	621	-	621	k
Total assets	1,095,639	(2,820)	1,092,819	

(1) The adjustments remove the assets, liabilities and equity balances of Level 3 entities deconsolidated for regulatory purposes, and reinstate any intragroup assets and liabilities, treating them as external to the Level 2 Group.

(2) Reference to the breakdown of regulatory capital in CC1: *Composition of regulatory capital*.

(3) The investment in MLC Limited has been classified as held for sale, as NAB has entered into an agreement to sell its remaining 20 per cent stake in MLC Limited to Nippon Life Insurance Company. The proposed sale is subject to satisfaction of certain conditions and regulatory approvals and is expected to complete in the second half of calendar year 2025.

Composition of capital (cont.)

	As at 31 Mar 25			Reference
	Balance sheet as in published financial statements	Adjustments	Under regulatory scope of consolidation	
	\$m	\$m	\$m	
Liabilities				
Due to other banks	12,489	-	12,489	
Collateral received	4,721	-	4,721	
Other financial liabilities	72,887	-	72,887	
Deposits and other borrowings	720,886	-	720,886	
Derivative liabilities	23,473	-	23,473	
Current tax liabilities	496	-	496	
Provisions	1,478	-	1,478	
Due to controlled entities	-	83	83	
Bonds, notes and subordinated debt	171,908	(2,905)	169,003	
of which: contractual value of Tier 2 instruments	27,428	-	27,428	l
of which: costs associated with issuing bonds, notes and subordinated debt	(135)	-	(135)	m
Debt issued	9,566	-	9,566	
of which: contractual value of Additional Tier 1 instruments	9,610	-	9,610	n
of which: costs associated with issuing convertible notes	(44)	-	(44)	o
Other liabilities	14,816	-	14,816	
Total liabilities	1,032,720	(2,822)	1,029,898	
Net assets	62,919	2	62,921	
Equity				
Contributed equity	36,119	-	36,119	p
Reserves	(56)	-	(56)	q
of which: cash flow hedge reserve	140	-	140	r
Retained profits	26,106	2	26,108	s
of which: after tax gains / (losses) due to changes in own credit risk on fair valued liabilities	(64)	-	(64)	t
Total equity (attributable to owners of the Company)	62,169	2	62,171	
Non-controlling interests	750	-	750	
Total equity	62,919	2	62,921	

Entities excluded from the Level 2 Group balance sheet

The following table provides details of entities included in the accounting scope of consolidation and excluded from the regulatory scope of consolidation.

Entity name	Principal activity	As at 31 Mar 25	
		Total assets	Total equity
		\$m	\$m
NAB Trust Services Limited	Trustee	11	11
National Australia Managers Limited	Funds manager	4	3
National RMBS Trust 2018-1	Securitisation	327	(2)
National RMBS Trust 2018-2	Securitisation	339	(1)
National RMBS Trust 2022-1	Securitisation	703	1
National RMBS Trust 2024-1	Securitisation	1,554	(4)

3.2 Countercyclical capital buffer

CCyB1: Geographical distribution of credit exposures used in the calculation of the bank-specific countercyclical capital buffer requirement

The CCyB requirement is calculated as the weighted average of CCyB requirements that apply in jurisdictions in which private sector exposures are held.

The following table provides details of the geographical breakdown of the risk-weighted amount of private sector credit exposures relevant for the calculation of the CCyB, based on the jurisdiction of residence of the immediate counterparty.

March 2025 v September 2024

The CCyB requirement remained consistent at 0.85%. Whilst the risk-weighted amount of Australian private sector exposures increased by \$7.5 billion or 2.8%, this had minimal impact to the weighted average with the risk-weighted amount of Australian private sector exposures representing a similar proportion of the risk-weighted amount of total private sector exposures.

Geographical breakdown	As at 31 Mar 25				As at 30 Sep 24			
	CCyB rate	RWA used in the computation of the CCyB	Bank-specific CCyB rate	CCyB amount ⁽¹⁾	CCyB rate	RWA used in the computation of the CCyB	Bank-specific CCyB rate	CCyB amount ⁽¹⁾
	%	\$m	%	\$m	%	\$m	%	\$m
Australia	1.00	271,959			1.00	264,442		
France	1.00	1,930			1.00	1,215		
Germany	0.75	1,163			0.75	1,035		
Hong Kong	0.50	655			1.00	783		
Ireland	1.50	297			1.50	293		
Luxembourg	0.50	776			0.50	873		
Netherlands	2.00	1,115			2.00	1,347		
Norway	2.50	299			2.50	333		
Sweden	2.00	381			2.00	433		
United Kingdom	2.00	9,888			2.00	9,566		
Other	0.50 - 2.50	443			0.50 - 2.50	491		
Sum⁽²⁾		288,906				280,811		
Total⁽³⁾		353,118	0.85	3,625		344,777	0.85	3,510

(1) Amount of CET1 capital held to meet the CCyB requirement, computed as total RWA multiplied by the bank-specific CCyB rate.

(2) Sum of the risk-weighted amount of private sector credit exposures in jurisdictions with a non-zero CCyB rate.

(3) Total of the risk-weighted amount of private sector credit exposures across all jurisdictions, including jurisdictions with no CCyB rate or a CCyB rate set at zero.

3.3 Leverage ratio

The leverage ratio is a non-risk-based measure that uses exposures to supplement the RWA-based capital requirements. It is calculated in accordance with APS 110.

LR1: Summary comparison of accounting assets vs leverage ratio exposure measure

The following table provides a reconciliation of total assets for the Group with the leverage ratio exposure measure.

Key differences between total assets for the Group, as reported in the financial statements, and amounts included in the leverage ratio exposure measure are:

- the inclusion of off-balance sheet credit commitments using prescribed credit conversion factors in leverage ratio exposures,
- SFT exposures in the leverage ratio being based on the average of month-end balances during the quarter, compared to the amount as at the reporting date in the balance sheet, and the inclusion of additional counterparty credit risk measures in the leverage ratio exposure measure, and
- measurement of derivative exposures under the modified standardised approach for measuring counterparty credit risk exposures (SA-CCR) for the purposes of the leverage ratio, compared to the measurement of derivative assets and collateral balances under accounting standards and interpretations issued by the Australian Accounting Standards Board.

		As at	
		31 Mar 25	30 Sep 24
		\$m	\$m
1	Total consolidated assets as per published financial statements	1,095,639	1,080,248
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	29	25
3	Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference	(2,849)	(3,190)
7	Adjustments for eligible cash pooling transactions	-	-
8	Adjustments for derivative financial instruments	4,941	362
9	Adjustment for SFTs (i.e. repurchase agreements and similar secured lending)	476	2,946
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	123,202	121,905
11	Adjustments for prudent valuation adjustments and provisions which have reduced Tier 1 capital	-	-
12	Other adjustments	(10,701)	(10,441)
13	Leverage ratio exposure measure	1,210,737	1,191,855

LR2: Leverage ratio common disclosure template

The leverage ratio calculation is presented on the following page.

All amounts in the leverage ratio calculation are measured as at the reporting date, with the exception of SFT exposures, which are based on a simple average of month-end balances during the quarter.

March 2025 v September 2024

The leverage ratio decreased by 8 basis points, mainly due to an \$18.9 billion or 1.6% increase in total exposures. SFT exposures increased by \$11.9 billion from increased reverse repurchase agreement activity. In addition, on-balance sheet exposures increased by \$5.9 billion, mainly related to increases in loans and advances and debt securities, partially offset by decreases in deposits with central banks. Although total derivative exposures were largely unchanged, the notional amount of written credit derivatives reduced due to trade compression (reflected in row 11), which was offset by corresponding reductions to notional amounts of purchased credit protection (reflected in row 12).

March 2025 v December 2024

The leverage ratio increased by 18 basis points, from both a \$1.3 billion or 2.1% increase in Tier 1 capital and a \$21.1 billion or 1.7% decrease in total exposures. The increase in Tier 1 capital was mainly due to an increase in retained profits, partially offset by a decrease in contributed equity from the on-market buy-back. The decrease in on-balance sheet exposures of \$13.7 billion was the most significant driver of the decrease in total exposures, mainly related to decreases in deposits with central banks, partially offset by increases in loans and advances and debt securities. In addition, derivative exposures decreased by \$9.3 billion, in particular foreign exchange derivatives.

Leverage ratio (cont.)

		As at		
		31 Mar 25	31 Dec 24	30 Sep 24 ⁽¹⁾
		\$m	\$m	\$m
On-balance sheet exposures				
1	On-balance sheet exposures (excluding derivatives and SFTs, but including collateral)	966,943	980,340	960,915
2	Gross-up for derivatives collateral provided where deducted from balance sheet assets pursuant to the operative accounting framework	4,864	5,802	3,710
3	(Deductions of receivable assets for cash variation margin provided in derivatives transactions)	(7,126)	(7,885)	(6,305)
5	(Provisions associated with on-balance sheet exposures that are deducted from Tier 1 capital)	(5,452)	(5,456)	(5,313)
6	(Asset amounts deducted in determining Tier 1 capital and regulatory adjustments)	(10,116)	(9,969)	(9,833)
7	Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of rows 1 to 6)	949,113	962,832	943,174
Derivative exposures				
8	Replacement cost associated with all derivatives transactions (where applicable net of eligible cash variation margin and/or with bilateral netting)	10,474	16,397	10,165
9	Add-on amounts for potential future exposure associated with all derivatives transactions	19,750	23,141	20,510
11	Adjusted effective notional amount of written credit derivatives	5,995	2,743	16,589
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	(4,772)	(1,533)	(15,533)
13	Total derivative exposures (sum of rows 8 to 12)	31,447	40,748	31,731
SFT exposures⁽²⁾				
14	Gross SFT assets (with no recognition of netting), after adjustment for sale accounting transactions	119,993	120,142	106,898
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(17,826)	(19,583)	(16,026)
16	Counterparty credit risk exposure for SFT assets	5,393	5,242	4,781
18	Total SFT exposures (sum of rows 14 to 17)	107,560	105,801	95,653
Other off-balance sheet exposures				
19	Off-balance sheet exposure at gross notional amount	251,635	252,627	246,429
20	(Adjustments for conversion to credit equivalent amounts)	(128,433)	(129,577)	(124,524)
21	(Provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	(585)	(605)	(608)
22	Off-balance sheet items (sum of rows 19 to 21)	122,617	122,445	121,297
Capital and total exposures				
23	Tier 1 capital	60,826	59,567	60,728
24	Total exposures (sum of rows 7, 13, 18 and 22)	1,210,737	1,231,826	1,191,855
Leverage ratio				
25	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves)	5.02%	4.84%	5.10%
26	National minimum leverage ratio requirement	3.50%	3.50%	3.50%
Disclosure of mean values				
28	Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	102,167	100,559	90,872
29a	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	107,084	107,592	92,707
30	Total exposures (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	1,210,737	1,231,826	1,191,855
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5.02%	4.84%	5.10%

(1) The provision for credit impairment attributed to on- and off-balance sheet exposures is required to be disclosed separately under the revised APS 330. This differs from presentation in the September 2024 Pillar 3 Report where this amount formed part of on-balance sheet exposures.

(2) SFT exposures are the average of month-end balances during the quarter.

Links between financial statements and regulatory exposures

LI1: Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

The following disclosure shows how the carrying value of assets and liabilities reported in the Group's balance sheet correspond to regulatory risk categories for exposures other than off-balance sheet items. Where an exposure attracts capital charges according to more than one risk category framework, the carrying value is reported in all columns that attract a capital charge, such that the sum of amounts in columns (c) to (g) does not equal to column (b). This is the case for derivatives, repurchase agreements and collateral associated with these products.

CC2: *Reconciliation of regulatory capital to balance sheet* expands on the differences between the scope of accounting consolidation and regulatory consolidation shown in columns (a) and (b).

This annual template has been included in this report to facilitate understanding of how carrying values in other disclosures, in particular in the credit risk section, correspond to amounts on the Group's balance sheet.

	As at 31 Mar 25						
	a	b	c	d	e	f	g
	Reported in published financial statements	Under regulatory scope of consolidation	Carrying value of items subject to:				Not subject to capital requirements / deducted from capital
			Credit risk framework	Counterparty credit risk framework	Securitisation framework	Market risk framework	
\$m	\$m	\$m	\$m	\$m	\$m	\$m	
Assets							
Cash and liquid assets	1,433	1,433	1,433	-	-	-	-
Due from other banks	94,865	94,865	92,451	2,414	-	2,414	-
Collateral placed	6,971	6,971	-	6,971	-	6,971	-
Trading assets	153,947	153,947	36,176	104,670	-	117,769	2
Derivative assets	24,243	24,244	-	24,243	1	24,243	-
Debt instruments	44,597	44,597	42,691	-	1,903	3	-
Other financial assets	764	764	740	-	-	-	24
Loans and advances ⁽¹⁾	750,821	747,972	729,249	-	21,328	3	(2,608)
Current tax assets	39	39	39	-	-	-	-
Due from controlled entities	-	18	18	-	-	-	-
Deferred tax assets	3,022	3,022	-	-	-	-	3,022
Property, plant and equipment	2,725	2,725	2,725	-	-	-	-
Investments in controlled entities	-	10	-	-	-	-	10
Goodwill and other intangible assets	5,371	5,371	-	-	-	-	5,371
Assets held for sale	243	243	-	-	-	-	243
Other assets	6,598	6,598	3,404	-	-	-	3,194
Total assets	1,095,639	1,092,819	908,926	138,298	23,232	151,403	9,258
Liabilities							
Due to other banks	12,489	12,489	-	2,276	-	2,276	10,213
Collateral received	4,721	4,721	-	4,721	-	4,721	-
Other financial liabilities	72,887	72,887	-	54,589	-	59,809	13,078
Deposits and other borrowings	720,886	720,886	-	-	-	-	720,886
Derivative liabilities	23,473	23,473	-	23,473	-	23,473	-
Current tax liabilities	496	496	-	-	-	-	496
Provisions	1,478	1,478	-	-	-	-	1,478
Due to controlled entities	-	83	-	-	-	-	83
Bonds, notes and subordinated debt	171,908	169,003	-	-	-	-	169,003
Debt issued	9,566	9,566	-	-	-	-	9,566
Other liabilities	14,816	14,816	-	-	-	-	14,816
Total liabilities	1,032,720	1,029,898	-	85,059	-	90,279	939,619

(1) Column (a) is net and columns (c) to (f) are gross of the \$6,037 million provision for credit impairment.

Links between financial statements and regulatory exposures (cont.)

As at 30 Sep 24							
	<i>a</i>	<i>b</i>	Carrying value of items subject to:				<i>g</i>
	Reported in published financial statements	Under regulatory scope of consolidation	Credit risk framework	Counterparty credit risk framework	Securitisation framework	Market risk framework	
	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Assets							
Cash and liquid assets	2,499	2,499	2,499	-	-	-	-
Due from other banks	110,438	110,438	107,982	2,456	-	2,456	-
Collateral placed	9,633	9,633	-	9,633	-	9,633	-
Trading assets	133,606	133,606	37,448	87,814	-	96,156	2
Derivative assets	28,766	28,773	-	28,766	7	28,766	-
Debt instruments	41,999	41,999	39,230	-	2,767	2	-
Other financial assets	769	769	745	-	-	-	24
Loans and advances ⁽¹⁾	732,692	729,495	710,720	-	21,518	6	(2,749)
Current tax assets	25	25	25	-	-	-	-
Due from controlled entities	-	15	15	-	-	-	-
Deferred tax assets	3,181	3,181	-	-	-	-	3,181
Property, plant and equipment	2,865	2,865	2,865	-	-	-	-
Investments in controlled entities	-	10	-	-	-	-	10
Goodwill and other intangible assets	5,224	5,224	-	-	-	-	5,224
Other assets	8,551	8,551	3,739	-	-	-	4,812
Total assets	1,080,248	1,077,083	905,268	128,669	24,292	137,019	10,504
Liabilities							
Due to other banks	12,328	12,328	-	3,102	-	3,102	9,226
Collateral received	5,151	5,151	-	5,151	-	5,151	-
Other financial liabilities	70,272	70,272	-	54,679	-	58,175	12,097
Deposits and other borrowings	712,566	712,566	-	-	-	-	712,566
Derivative liabilities	32,576	32,576	-	32,576	-	32,576	-
Current tax liabilities	1,042	1,045	-	-	-	-	1,045
Provisions	1,804	1,804	-	-	-	-	1,804
Due to controlled entities	-	89	-	-	-	-	89
Bonds, notes and subordinated debt	156,294	153,030	-	-	-	-	153,030
Debt issued	9,560	9,560	-	-	-	-	9,560
Other liabilities	16,442	16,442	-	-	-	-	16,442
Total liabilities	1,018,035	1,014,863	-	95,508	-	99,004	915,859

(1) Column (a) is net and columns (c) to (f) are gross of the \$5,921 million provision for credit impairment.

Credit risk

This section excludes credit risk information in respect of exposures subject to a counterparty credit risk charge within the scope of APS 180 *Capital Adequacy: Counterparty Credit Risk* and securitisation exposures within the scope of APS 120, which have separate disclosures in Section 6 *Counterparty credit risk* and Section 7 *Securitisation*, respectively.

5.1 General information about credit risk

CR1: Credit quality of assets

The following table provides information on the credit quality of assets and off-balance sheet exposures.

The gross carrying value of loans and debt securities in column (a) is the accounting value of these assets before the provision for credit impairment. The gross carrying value of off-balance sheet exposures in column (a) is the amount that has been committed to be lent, and the maximum amount that could be paid under guarantees granted, before the provision for credit impairment. As APRA requirements include arrangements that can be unconditionally cancelled by the ADI as commitments, off-balance sheet exposures for the Level 2 Group include revocable loan commitments.

The amounts in columns (d)/(e) and (f) show the total provision for credit impairment in column (c) held against exposures under the standardised and IRB approaches.

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Non-performing exposures increased by \$1,031 million or 10.1%. This mainly reflects broad-based deterioration in the Business and Private Banking business lending portfolio, and to a lesser extent, higher arrears for the Australian mortgage portfolio.

		As at 31 Mar 25					
		a	b	c	d/e	f	g
		Gross carrying value of		Total provision for credit impairment	Of which expected credit loss accounting provision for credit losses on		Net carrying value (a+b-c)
		Non-performing exposures	Performing exposures		SA exposures ⁽¹⁾	IRB approach exposures	
		\$m	\$m	\$m	\$m	\$m	\$m
1	Loans, comprising:	10,820	719,169	5,452	238	5,214	724,537
-	Loans and advances	10,820	718,429	5,452	238	5,214	723,797
-	Other financial assets	-	740	-	-	-	740
2	Debt securities, comprising:	-	78,867	-	-	-	78,867
-	Trading assets	-	36,176	-	-	-	36,176
-	Debt instruments	-	42,691	-	-	-	42,691
3	Off-balance sheet exposures	441	235,824	585	42	543	235,680
4	Total	11,261	1,033,860	6,037	280	5,757	1,039,084

(1) Further breakdown of the provision for credit impairment held against exposures under the standardised approach has not been provided on the basis of materiality.

		As at 30 Sep 24					
		a	b	c	d/e	f	g
		Gross carrying value of		Total provision for credit impairment	Of which expected credit loss accounting provision for credit losses on		Net carrying value (a+b-c)
		Non-performing exposures	Performing exposures		SA exposures ⁽¹⁾	IRB approach exposures	
		\$m	\$m	\$m	\$m	\$m	\$m
1	Loans, comprising:	9,840	701,625	5,313	264	5,049	706,152
-	Loans and advances	9,840	700,880	5,313	264	5,049	705,407
-	Other financial assets	-	745	-	-	-	745
2	Debt securities, comprising:	-	76,678	-	-	-	76,678
-	Trading assets	-	37,448	-	-	-	37,448
-	Debt instruments	-	39,230	-	-	-	39,230
3	Off-balance sheet exposures	390	227,743	608	34	574	227,525
4	Total	10,230	1,006,046	5,921	298	5,623	1,010,355

(1) Further breakdown of the provision for credit impairment held against exposures under the standardised approach has not been provided on the basis of materiality.

General information about credit risk (cont.)

Exposure at default, non-performing exposures and related provisions by industry

The following table provides a breakdown by industry, based on ANZSIC Level 1 classifications, of:

- EaD subject to the credit risk and counterparty credit risk frameworks, which excludes securitisation exposures subject to the requirements of APS 120,
- non-performing exposures, and
- the provision for credit impairment for non-performing exposures, including the provision for non-performing exposures which are individually assessed.

This information forms part of the annual template CRB: *Additional disclosure related to credit quality of assets*, which has been included in this report as additional information.

Industry sector	As at 31 Mar 25			
	EaD post-CCF and post-CRM	Non-performing exposures	Provision for non-performing exposures ⁽¹⁾	Of which individually assessed provision for credit impairment
	\$m	\$m	\$m	\$m
Accommodation and hospitality	13,382	234	66	21
Agriculture, forestry, fishing and mining	68,684	1,267	227	100
Business services and property services	25,011	493	166	113
Commercial property	88,457	1,133	229	35
Construction	14,750	393	127	91
Finance and insurance	174,188	106	35	18
Government and public authorities	73,831	-	-	-
Manufacturing	21,512	597	272	230
Personal	20,918	200	105	2
Residential mortgages	486,032	5,510	569	55
Retail and wholesale trade	34,946	676	226	144
Transport and storage	22,402	278	68	43
Utilities	15,932	13	19	17
Other ⁽²⁾	37,589	361	87	51
Total	1,097,634	11,261	2,196	920
Provision for performing exposures⁽³⁾			3,841	
Total provision for credit impairment			6,037	

(1) Provision for non-performing exposures represents Stage 3 expected credit losses, which are individually and collectively assessed.

(2) Other includes health and community services, and education.

(3) Provision for performing exposures represents Stage 1 and Stage 2 expected credit losses, which are collectively assessed.

General information about credit risk (cont.)

Industry sector	As at 30 Sep 24			
	EaD post-CCF and post-CRM	Non- performing exposures	Provision for non- performing exposures ⁽¹⁾	Of which individually assessed provision for credit impairment
	\$m	\$m	\$m	\$m
Accommodation and hospitality	12,657	206	62	18
Agriculture, forestry, fishing and mining	68,917	1,197	220	77
Business services and property services	23,519	398	143	98
Commercial property	84,551	994	204	32
Construction	13,910	357	108	59
Finance and insurance	183,742	86	29	18
Government and public authorities	70,974	-	-	-
Manufacturing	20,269	519	209	177
Personal	20,910	188	84	2
Residential mortgages	476,271	5,167	441	59
Retail and wholesale trade	33,665	581	239	150
Transport and storage	23,429	249	59	31
Utilities	14,787	9	2	1
Other ⁽²⁾	37,210	279	55	34
Total	1,084,811	10,230	1,855	756

Provision for performing exposures⁽³⁾

4,066

Total provision for credit impairment

5,921

(1) Provision for non-performing exposures represents Stage 3 expected credit losses, which are individually and collectively assessed.

(2) Other includes health and community services, and education.

(3) Provision for performing exposures represents Stage 1 and Stage 2 expected credit losses, which are collectively assessed.

CR2: Changes in stock of non-performing loans and debt securities

The following table provides details of the movement in non-performing exposures, including off-balance sheet exposures, over the reporting period.

	6 months ended	
	31 Mar 25	30 Sep 24
	\$m	\$m
1 Non-performing loans and debt securities at end of the previous reporting period	10,230	8,691
2 Loans and debt securities that have defaulted since the last reporting period	4,383	4,270
3 Returned to performing status	(1,723)	(1,551)
4 Amounts written off	(251)	(273)
5 Other changes ⁽¹⁾	(1,378)	(907)
6 Non-performing loans and debt securities at end of the reporting period	11,261	10,230

(1) Non-performing exposures that have been repaid, and other exposure changes.

5.2 Credit risk mitigation

CR3: Credit risk mitigation techniques – overview

The following table provides details of credit risk mitigation based on the carrying value of loans and advances and debt securities. Amounts are net of the provision for credit impairment, with non-performing exposures in row 4 net of Stage 3 expected credit losses.

The carrying value in column (a) is exposures that do not benefit from credit risk mitigation. This includes fully unsecured exposures and the unsecured portion of partially secured exposures.

The carrying value in column (b) is exposures that have at least one credit risk mitigation mechanism, excluding any over collateralisation. This includes the secured portion of partially secured exposures.

The carrying value of secured exposures in column (b) is broken down by nature of the credit risk mitigation in columns (c), (d) and (e). The carrying value of exposures secured by collateral in column (c) is based on bank extended value, which is calculated at a discount to market value based on the nature of the underlying security.

		As at 31 Mar 25				
		<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>
		Carrying value of:				
		Exposures unsecured	Exposures to be secured	Exposures secured by collateral	Exposures secured by financial guarantees	Exposures secured by credit derivatives
		\$m	\$m	\$m	\$m	\$m
1	Loans	75,327	649,210	647,536	1,674	-
2	Debt securities	73,780	5,087	5,087	-	-
3	Total	149,107	654,297	652,623	1,674	-
4	of which: non-performing	245	8,446	8,446	-	-

5.3 Credit risk under standardised approach

Asset classes for the Level 2 Group excluding BNZ have been determined with reference to APS 112 *Capital Adequacy: Standardised Approach to Credit Risk*, as required by APS 330.

CR4: Standardised approach – credit risk exposure and credit risk mitigation effects

The following table provides details of EaD and RWA for exposures subject to the standardised approach. It presents on- and off-balance sheet EaD before CCF and CRM in columns (a) and (b), and after CCF and CRM in columns (c) and (d). RWA density in column (f) is RWA over EaD after CCF and CRM.

EaD post-CCF and post-CRM is derived by applying relevant CCFs to committed but undrawn exposures. The value of this on-balance sheet equivalent amount is reduced by any provisions for non-performing exposures before credit risk mitigation is taken into account.

March 2025 v September 2024

Credit RWA under the standardised approach decreased by \$1.7 billion or 7.2% mainly due to the application of a lower risk-weight to certain corporate SME exposures. Refer to CR5: *Standardised approach – exposures by asset classes and risk-weights* for further detail of standardised exposures by risk-weight and risk-weight bands.

Asset classes	As at 31 Mar 25											
	a		b		c		d		e		f	
	EaD pre-CCF and pre-CRM		EaD post-CCF and post-CRM		RWA		RWA density					
	On-balance sheet	Off-balance sheet	On-balance sheet	Off-balance sheet								
	\$m	\$m	\$m	\$m	\$m	\$m	%					
Corporate (including SME)	6,384	6,930	6,330	2,477	6,351	72%						
Residential mortgage	6,011	1,585	6,002	636	2,826	43%						
Other retail	5,215	8,681	5,188	3,288	6,009	71%						
Other ⁽¹⁾	5,350	-	5,350	-	4,117	77%						
RBNZ regulated banking subsidiary	13,906	1,037	13,492	550	2,185	16%						
Total	36,866	18,233	36,362	6,951	21,488	50%						

(1) Consists of cash items in the process of collection, investment in premises and other fixed assets, and all other exposures.

Credit risk under standardised approach (cont.)

CR5: Standardised approach – exposures by asset classes and risk-weights

CR5(i): Standardised approach – exposure at default by asset class and risk-weight

The following table provides a breakdown of credit risk exposures subject to the standardised approach by asset class and risk-weight.

Risk-weight	As at 31 Mar 25													EaD post-CCF and post-CRM \$m
	0%	20%	25%	30%	35%	40%	45%	50%	75%	85%	100%	110%	Other	
Asset classes	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Corporate (including SME)	-	2,152	-	-	-	-	-	-	18	5,625	102	852	58	8,807
Residential mortgage	-	667	1,179	1,321	840	767	667	158	-	20	772	17	230	6,638
Other retail	-	1,139	-	-	-	-	-	-	6,373	-	890	-	74	8,476
Other ⁽¹⁾	1,009	353	-	-	-	-	-	-	-	-	3,949	-	39	5,350
RBNZ regulated banking subsidiary	8,359	3,888	-	-	-	1	-	772	-	-	1,022	-	-	14,042
Total	9,368	8,199	1,179	1,321	840	768	667	930	6,391	5,645	6,735	869	401	43,313

(1) Consists of cash items in the process of collection, investment in premises and other fixed assets, and all other exposures.

Credit risk under standardised approach (cont.)

CR5(ii): Standardised approach – exposure at default by risk-weight band

The following table provides a breakdown of on- and off-balance sheet credit risk exposures subject to the standardised approach by risk-weight band.

		As at 31 Mar 25			
Risk-weight		On-balance sheet EaD (pre-CRM)	Off-balance sheet EaD (pre-CCF and pre-CRM)	Weighted average CCF ⁽¹⁾	EaD post-CCF and post-CRM
		\$m	\$m	%	\$m
1	Less than 40%	19,419	6,600	23%	20,907
2	40 - 70%	2,192	622	45%	2,469
3	75%	3,559	7,082	40%	6,391
4	85% ⁽²⁾	4,473	2,504	47%	5,653
5	90 - 100%	6,500	658	36%	6,739
6	105 - 130%	533	743	57%	960
7	150%	151	24	15%	155
8	250%	39	-	-	39
11	Total	36,866	18,233	35%	43,313

(1) Weighting is based on off-balance sheet exposure (pre-CCF).

(2) Row 4 includes exposures with an 80% risk-weight.

5.4 Credit risk under internal-based approaches

CR6: IRB – credit risk exposures by portfolio and probability of default range

In the tables below of credit risk exposures by asset class and probability of default (PD) band:

- The number of borrowers in column (f) is based on:
 - the number of counterparties within each asset class for the corporate (including SME), retail SME, sovereign and financial institution asset classes,
 - the number of agreements within each asset class for the residential mortgage, qualifying revolving retail and other retail asset classes, and
 - the number of counterparties or agreements following the approach outlined above for BNZ's underlying asset classes for the RBNZ regulated banking subsidiary's number of borrowers.
- Average maturity in column (h) is only disclosed for asset classes where it is used for the RWA calculation, consistent with the disclosure template prescribed by APS 330.
- RWA in column (i) and RWA density in column (j) exclude RWA overlay adjustments.
- Provision for credit impairment in column (l) represents the total provision for credit impairment, and is disclosed for each asset class and not by PD band, consistent with the disclosure template prescribed by APS 330.

Credit risk exposures subject to the A-IRB approach by asset class and PD band

The following table provides key parameters used in the calculation of capital requirements for credit risk exposures under the A-IRB approach by asset class and PD band.

PD scale	As at 31 Mar 25											
	a	b	c	d	e	f	g	h	i	j	k	l
	On-balance sheet EaD pre-CRM \$m	Off-balance sheet EaD pre-CCF and pre-CRM \$m	Average CCF %	EaD post-CCF and post-CRM \$m	Average PD %	Number of borrowers	Average loss given default (LGD) %	Average maturity years	RWA \$m	RWA density %	Expected loss \$m	Provision for credit impairment \$m
Corporate (including SME)												
0.00 to <0.15	5,445	7,804	44%	8,904	0.08%	2,233	30%	2.3	1,581	17.8%	2	
0.15 to <0.25	7,846	4,136	51%	9,927	0.20%	2,693	25%	2.2	2,424	24.4%	5	
0.25 to <0.50	35,150	14,497	49%	42,184	0.39%	13,231	23%	2.0	13,053	30.9%	39	
0.50 to <0.75	21,703	4,968	55%	24,411	0.62%	6,230	24%	1.9	10,254	42.0%	36	
0.75 to <2.50	101,497	19,639	60%	113,222	1.29%	36,493	24%	1.6	59,443	52.5%	351	
2.50 to <10.00	11,997	2,048	61%	13,253	3.95%	7,811	25%	1.5	9,765	73.7%	133	
10.00 to <100.00	1,796	184	51%	1,890	20.27%	1,310	26%	1.5	2,826	149.5%	100	
100.00 (Default)	3,512	278	57%	3,670	100.00%	1,927	29%	1.3	4,845	132.0%	965	
Sub-total	188,946	53,554	53%	217,461	2.93%	71,928	24%	1.7	104,191	47.9%	1,631	2,633

Credit risk under internal-based approaches (cont.)

As at 31 Mar 25

	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>	<i>i</i>	<i>j</i>	<i>k</i>	<i>l</i>
	On-balance sheet EaD pre-CRM	Off-balance sheet EaD pre-CCF and pre-CRM	Average CCF	EaD post-CCF and post-CRM	Average PD	Number of borrowers	Average loss given default (LGD)	Average maturity	RWA	RWA density	Expected loss	Provision for credit impairment
PD scale	\$m	\$m	%	\$m	%		%	years	\$m	%	\$m	\$m
Retail SME												
0.00 to <0.15	357	714	95%	1,036	0.11%	5,393	23%		68	6.6%	-	
0.15 to <0.25	488	659	97%	1,127	0.19%	5,716	24%		115	10.2%	1	
0.25 to <0.50	2,692	2,210	96%	4,820	0.40%	25,417	24%		819	17.0%	5	
0.50 to <0.75	1,230	796	96%	1,997	0.62%	12,377	25%		463	23.2%	3	
0.75 to <2.50	8,360	3,293	97%	11,565	1.37%	73,069	27%		4,131	35.7%	43	
2.50 to <10.00	2,723	613	98%	3,322	4.17%	29,170	28%		1,887	56.8%	38	
10.00 to <100.00	390	66	99%	455	19.22%	7,400	29%		440	96.6%	25	
100.00 (Default)	1,116	128	99%	1,242	100.00%	8,023	27%		1,914	154.0%	261	
Sub-total	17,356	8,479	97%	25,564	6.50%	166,565	26%		9,837	38.5%	376	571
Residential mortgage												
0.00 to <0.15	47,572	19,863	99%	67,263	0.10%	210,412	12%		4,048	6.0%	8	
0.15 to <0.25	68,291	14,671	99%	82,783	0.19%	203,600	13%		7,246	8.8%	21	
0.25 to <0.50	131,607	17,305	99%	148,781	0.37%	325,108	16%		25,617	17.2%	88	
0.50 to <0.75	35,876	3,358	100%	39,230	0.62%	75,716	19%		12,155	31.0%	47	
0.75 to <2.50	54,864	4,178	100%	59,032	1.08%	114,636	20%		27,420	46.5%	127	
2.50 to <10.00	10,498	250	98%	10,742	5.33%	22,900	17%		10,642	99.1%	96	
10.00 to <100.00	7,275	38	98%	7,312	26.09%	16,399	17%		11,799	161.4%	342	
100.00 (Default)	4,773	116	90%	4,877	100.00%	10,055	25%		10,040	205.9%	487	
Sub-total	360,756	59,779	99%	420,020	2.14%	978,826	16%		108,967	25.9%	1,216	1,135

Credit risk under internal-based approaches (cont.)

As at 31 Mar 25

	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>	<i>i</i>	<i>j</i>	<i>k</i>	<i>l</i>
	On-balance sheet EaD pre-CRM	Off-balance sheet EaD pre-CCF and pre-CRM	Average CCF	EaD post-CCF and post-CRM	Average PD	Number of borrowers	Average loss given default (LGD)	Average maturity	RWA	RWA density	Expected loss	Provision for credit impairment
PD scale	\$m	\$m	%	\$m	%		%	years	\$m	%	\$m	\$m
Qualifying revolving retail												
0.00 to <0.15	385	4,673	55%	2,945	0.10%	535,749	74%		150	5.1%	2	
0.15 to <0.25	389	1,829	47%	1,243	0.19%	209,615	74%		103	8.2%	2	
0.25 to <0.50	685	1,550	49%	1,450	0.36%	213,528	74%		201	13.9%	4	
0.50 to <0.75	242	363	53%	434	0.62%	56,270	74%		94	21.6%	2	
0.75 to <2.50	1,501	1,158	56%	2,155	1.40%	251,115	75%		865	40.2%	23	
2.50 to <10.00	716	248	63%	871	4.47%	83,313	77%		814	93.4%	30	
10.00 to <100.00	171	21	61%	183	33.08%	19,675	76%		391	213.0%	46	
100.00 (Default)	35	10	1%	35	100.00%	4,562	78%		87	249.7%	21	
Sub-total	4,124	9,852	53%	9,316	1.91%	1,373,827	75%		2,705	29.0%	130	182
Other retail												
0.00 to <0.15	5	86	83%	76	0.07%	17,008	72%		11	14.8%	-	
0.15 to <0.25	6	25	71%	24	0.18%	4,614	73%		7	30.5%	-	
0.25 to <0.50	37	52	84%	81	0.40%	14,994	73%		40	49.7%	-	
0.50 to <0.75	21	19	91%	38	0.62%	8,607	72%		25	64.5%	-	
0.75 to <2.50	626	88	94%	709	1.69%	123,515	72%		676	95.4%	9	
2.50 to <10.00	501	71	96%	569	4.43%	129,401	73%		667	117.1%	19	
10.00 to <100.00	144	55	98%	199	29.25%	87,746	75%		362	182.5%	44	
100.00 (Default)	63	2	46%	64	100.00%	14,875	82%		120	187.4%	44	
Sub-total	1,403	398	89%	1,760	9.08%	400,760	73%		1,908	108.4%	116	150

Credit risk under internal-based approaches (cont.)

	As at 31 Mar 25											
	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>	<i>i</i>	<i>j</i>	<i>k</i>	<i>l</i>
	On-balance sheet EaD pre-CRM	Off-balance sheet EaD pre-CCF and pre-CRM	Average CCF	EaD post-CCF and post-CRM	Average PD	Number of borrowers	Average loss given default (LGD)	Average maturity	RWA	RWA density	Expected loss	Provision for credit impairment
PD scale	\$m	\$m	%	\$m	%		%	years	\$m	%	\$m	\$m
RBNZ regulated banking subsidiary												
0.00 to <0.15	3,534	4,838	26%	4,751	0.07%	212,588	48%		778	16.4%	1	
0.15 to <0.25	2,388	2,134	39%	3,158	0.20%	27,455	31%		807	25.6%	2	
0.25 to <0.50	9,574	4,819	43%	11,603	0.39%	65,051	30%		4,530	39.0%	14	
0.50 to <0.75	22,928	2,480	61%	24,433	0.59%	145,891	19%		5,604	22.9%	28	
0.75 to <2.50	49,179	4,675	49%	51,446	1.22%	193,611	24%		22,976	44.7%	154	
2.50 to <10.00	4,019	576	38%	4,224	4.38%	28,652	31%		3,839	90.9%	57	
10.00 to <100.00	660	69	19%	672	22.16%	9,253	41%		1,431	212.8%	62	
100.00 (Default)	969	17	43%	976	100.00%	5,500	31%		1,740	178.3%	224	
Sub-total	93,251	19,608	42%	101,263	2.11%	688,001	26%		41,705	41.2%	542	833
Total subject to A-IRB approach	665,836	151,670	75%	775,384	2.52%	3,679,907	21%	n/a	269,313	34.7%	4,011	5,504

Credit risk under internal-based approaches (cont.)

Credit risk exposures subject to the F-IRB approach by asset class and PD band

The following table provides key parameters used in the calculation of capital requirements for credit risk exposures under the F-IRB approach by asset class and PD band.

As at 31 Mar 25

	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>	<i>i</i>	<i>j</i>	<i>k</i>	<i>l</i>
	On-balance sheet EaD pre-CRM	Off-balance sheet EaD pre-CCF and pre-CRM	Average CCF	EaD post-CCF and post-CRM	Average PD	Number of borrowers	Average loss given default (LGD)	Average maturity	RWA	RWA density	Expected loss	Provision for credit impairment
PD scale	\$m	\$m	%	\$m	%		%	years	\$m	%	\$m	\$m
Corporate												
0.00 to <0.15	2,375	9,434	39%	5,832	0.09%	182	44%	2.3	1,677	28.8%	2	
0.15 to <0.25	3,562	9,171	35%	6,734	0.19%	192	40%	1.9	2,449	36.4%	5	
0.25 to <0.50	8,589	11,113	44%	13,392	0.37%	485	42%	2.4	8,040	60.0%	20	
0.50 to <0.75	1,322	1,216	47%	1,889	0.62%	106	40%	2.1	1,337	70.8%	5	
0.75 to <2.50	1,785	2,264	44%	2,751	1.23%	285	41%	2.2	2,540	92.3%	13	
2.50 to <10.00	307	189	52%	406	4.31%	48	35%	1.8	465	114.5%	6	
10.00 to <100.00	220	242	40%	317	23.43%	20	51%	1.0	909	286.7%	38	
100.00 (Default) ⁽¹⁾	52	12	61%	60	100.00%	10	42%	2.0	-	n/a	25	
Sub-total	18,212	33,641	40%	31,381	0.84%	1,328	42%	2.2	17,417	55.5%	114	120
Sovereign												
0.00 to <0.15	149,764	1,620	18%	146,925	0.02%	377	7%	2.0	2,243	1.5%	3	
0.15 to <0.25	-	4	2%	-	0.21%	1	5%	1.8	-	4.8%	-	
0.25 to <0.50	75	-	62%	75	0.38%	8	25%	4.4	37	50.1%	-	
0.50 to <0.75	-	-	72%	-	0.62%	6	15%	2.5	-	26.0%	-	
0.75 to <2.50	-	1	46%	1	1.58%	17	11%	1.2	-	22.8%	-	
2.50 to <10.00	-	-	40%	-	8.15%	8	25%	2.0	-	105.6%	-	
10.00 to <100.00	-	2	40%	1	23.43%	8	40%	1.6	2	225.4%	-	
100.00 (Default) ⁽¹⁾	-	-	56%	-	100.00%	1	25%	1.0	-	n/a	-	
Sub-total	149,839	1,627	18%	147,002	0.02%	426	7%	2.0	2,282	1.6%	3	6

(1) RWA for non-performing exposures is zero under the F-IRB approach.

Credit risk under internal-based approaches (cont.)

As at 31 Mar 25

	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>	<i>i</i>	<i>j</i>	<i>k</i>	<i>l</i>
	On-balance sheet EaD pre-CRM	Off-balance sheet EaD pre-CCF and pre-CRM	Average CCF	EaD post-CCF and post-CRM	Average PD	Number of borrowers	Average loss given default (LGD)	Average maturity	RWA	RWA density	Expected loss	Provision for credit impairment
PD scale	\$m	\$m	%	\$m	%		%	years	\$m	%	\$m	\$m
Financial institution												
0.00 to <0.15	28,539	33,430	49%	44,908	0.07%	726	44%	1.2	10,070	22.4%	14	
0.15 to <0.25	1,013	4,253	51%	3,180	0.18%	135	48%	1.7	1,525	47.9%	3	
0.25 to <0.50	880	1,477	25%	1,244	0.38%	436	43%	1.6	826	66.4%	2	
0.50 to <0.75	277	230	45%	380	0.62%	223	40%	1.9	334	88.0%	1	
0.75 to <2.50	1,676	1,151	60%	2,362	1.25%	1,103	31%	1.5	1,905	80.7%	9	
2.50 to <10.00	233	112	27%	263	3.97%	289	31%	1.7	313	118.7%	3	
10.00 to <100.00	30	54	3%	31	19.69%	69	38%	2.7	77	247.7%	2	
100.00 (Default) ⁽¹⁾	42	5	91%	47	100.00%	49	35%	1.6	-	n/a	16	
Sub-total	32,690	40,712	48%	52,415	0.26%	3,030	44%	1.3	15,050	28.7%	50	64
Total subject to F-IRB approach	200,741	75,980	44%	230,798	0.18%	4,784	20%	1.9	34,749	15.1%	167	190

(1) RWA for non-performing exposures is zero under the F-IRB approach.

Credit risk under internal-based approaches (cont.)

CR8: RWA flow statements of credit risk exposures under IRB

The following table attributes the change in total credit RWA over the quarter to key drivers, where:

- column (a) aligns to the requirements of CR8 in the BCBS *Disclosure Requirements* standard, and attributes the change in RWA for credit risk exposures subject to the A-IRB and F-IRB approaches to key drivers, and
- column (b) attributes the change in other credit RWA, including credit risk exposures under the supervisory slotting and standardised approaches, and RWA for counterparty credit risk and securitisation exposures to key drivers.

Total credit RWA in column (c) aligns to that shown in the *Overview of exposure at default and RWA by asset class* disclosure in Section 2 *Overview of key metrics and RWA*.

March 2025 v December 2024

RWA for credit risk exposures subject to the A-IRB and F-IRB approaches increased by \$1.5 billion or 0.5% in the three months to 31 March 2025 from lending growth, mostly in corporate (including SME) and residential mortgages (reflected in row 2). This was partially offset by the release of certain RWA overlay adjustments (reflected in row 4), and changes in asset quality and portfolio mix, including data refinements (reflected in row 3).

Other credit RWA decreased by \$5.1 billion or 8.8% in the three months to March 2025, mostly due to:

- a decrease in the EaD for derivatives, in particular foreign exchange derivatives (reflected in row 8), and
- the release of an RWA overlay adjustment for exposures under the standardised approach (reflected in row 4).

		3 months ended 31 Mar 25		
		a	b	c
		RWA under A-IRB and F-IRB approaches	Other credit RWA	Total credit RWA
		\$m	\$m	\$m
1	RWA as at end of previous reporting period	305,948	58,165	364,113
2	Asset size ⁽¹⁾	2,957	276	3,233
3	Asset quality ⁽²⁾	(641)	(382)	(1,023)
4	Model updates	(1,093)	(1,409)	(2,502)
5	Methodology and policy	-	-	-
7	Foreign exchange movements	283	163	446
8	Other ⁽³⁾		(3,781)	(3,781)
9	RWA as at end of reporting period	307,454	53,032	360,486

(1) Change in RWA attributed to changes in exposure size, including origination of new exposures and maturing exposures, and excluding changes related to acquisitions and disposals.

(2) Change in RWA attributed to the assessed quality of assets due to changes in borrower risk. This includes change in RWA related to portfolio mix at the end of the reporting period compared to the beginning of the reporting period.

(3) Other comprises the change in RWA for counterparty credit risk exposures (including credit valuation adjustment), excluding foreign exchange movements, which is not readily attributable to individual drivers.

Credit risk under internal-based approaches (cont.)

CR10: IRB - specialised lending under the slotting approach

Supervisory slotting portfolios

The following table provides specialised lending exposures subject to supervisory slotting by risk-weight.

Risk-weights in column (c) exclude APRA's 1.1 scaling factor for specialised lending exposures of the RBNZ regulated banking subsidiary, whereas RWA in column (g) is after application of this scaling factor.

March 2025 v September 2024

Credit RWA under the slotting approach increased by \$564 million or 6.3% mainly due to an increase in project finance and BNZ income-producing real estate exposures in the slotting category of strong.

Regulatory category	As at 31 Mar 25								
	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>		<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>
	On- balance sheet EaD	Off- balance sheet EaD pre- CCF	Risk- weight	EaD post-CCF and post-CRM		RBNZ regulated banking subsidiary	Total	RWA	Expected loss
	\$m	\$m	%	Project finance	\$m	\$m	\$m	\$m	\$m
Strong	3,371	1,763	70%	3,219	1,546	4,765	3,444	19	
Good	4,688	614	90%	707	4,287	4,994	4,880	40	
Satisfactory	536	127	115%	29	533	562	708	16	
Weak	157	9	250%	4	158	162	445	13	
Default ⁽¹⁾	36	-	n/a	17	19	36	-	18	
Total	8,788	2,513		3,976	6,543	10,519	9,477	106	

(1) RWA for non-performing exposures is zero under the supervisory slotting approach.

Counterparty credit risk

Counterparty credit risk is the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. An economic loss would occur if the transaction or portfolio of transactions with the counterparty has a positive economic value at the time of default.

Counterparty credit risk requirements set out in APS 180 are applied to derivative transactions, long settlement transactions and SFTs held in both the banking and trading book.

CCR1: Analysis of CCR exposures by approach

The following table provides the capital requirement for counterparty credit risk exposures by approach, including components of EaD. This table excludes exposures cleared through CCPs, which are disclosed separately in CCR8: *Exposures to central counterparties*.

		As at 31 Mar 25				
		Replacement cost	Potential future exposure	Alpha used for computing regulatory EaD	EaD post-CRM	RWA
		\$m	\$m		\$m	\$m
1	SA-CCR (for derivatives) ⁽¹⁾	7,353	10,230	1.4	24,529	9,879
-	Current exposure method (for derivatives) ⁽²⁾				1,485	701
4	Comprehensive approach for CRM (for SFTs)				8,304	1,014
6	Total				34,318	11,594

(1) SA-CCR is used under APRA requirements to measure the EaD of derivatives for the Level 2 Group excluding BNZ.

(2) Current exposure method is used under RBNZ requirements to measure the EaD of derivatives for BNZ.

CCR3: Standardised approach – CCR exposures by regulatory portfolio and risk-weights

The following table provides a breakdown of counterparty credit risk exposures subject to the standardised approach by asset class and risk-weight. This table excludes exposures cleared through CCPs, which are disclosed separately in CCR8: *Exposures to central counterparties*.

		As at 31 Mar 25					EaD post-CRM
Risk-weight		0%	20%	50%	85%	Other	
Asset class		\$m	\$m	\$m	\$m	\$m	\$m
Corporate (including SME)		-	24	-	73	1	98
RBNZ regulated banking subsidiary		1,606	224	35	-	-	1,865
Total		1,606	248	35	73	1	1,963

Counterparty credit risk (cont.)

CCR4: IRB – CCR exposures by portfolio and probability of default scale

The tables below of counterparty credit risk exposures by PD band exclude exposures cleared through CCPs, which are disclosed separately in CCR8: *Exposures to central counterparties*.

Counterparty credit risk exposures subject to the A-IRB approach by asset class and PD band

The following table provides key parameters used in the calculation of capital requirements for counterparty credit risk exposures under the A-IRB approach by asset class and PD band.

PD scale	As at 31 Mar 25						
	EaD post-CRM \$m	Average PD %	Number of counterparties	Average LGD %	Average maturity years	RWA \$m	RWA density %
Corporate (including SME)							
0.00 to <0.15	1,356	0.09%	156	37%	2.2	305	23%
0.15 to <0.25	510	0.20%	173	35%	2.7	200	39%
0.25 to <0.50	583	0.38%	560	41%	2.3	321	55%
0.50 to <0.75	193	0.62%	263	49%	2.5	186	96%
0.75 to <2.50	557	1.07%	772	46%	1.7	537	96%
2.50 to <10.00	14	3.38%	101	49%	1.3	18	127%
10.00 to <100.00	30	23.08%	65	50%	1.1	81	265%
100.00 (Default)	1	100.00%	6	50%	1.1	5	687%
Sub-total	3,244	0.61%	2,096	40%	2.2	1,653	51%
RBNZ regulated banking subsidiary							
0.00 to <0.15	387	0.09%	68	59%	1.4	116	30%
0.15 to <0.25	109	0.19%	57	59%	1.4	55	51%
0.25 to <0.50	151	0.38%	144	59%	1.8	116	77%
0.50 to <0.75	30	0.62%	68	59%	1.4	27	90%
0.75 to <2.50	98	1.18%	243	59%	1.7	121	122%
2.50 to <10.00	13	3.47%	60	59%	1.1	21	167%
10.00 to <100.00	50	23.39%	12	60%	1.6	169	341%
Sub-total	838	1.73%	652	59%	1.5	625	75%
Total subject to A-IRB approach	4,082	0.84%	2,748	44%	2.1	2,278	56%

Counterparty credit risk (cont.)

Counterparty credit risk exposures subject to the F-IRB approach by asset class and PD band

The following table provides key parameters used in the calculation of capital requirements for counterparty credit risk exposures under the F-IRB approach by asset class and PD band.

PD scale	As at 31 Mar 25						
	EaD post-CRM \$m	Average PD %	Number of counterparties	Average LGD %	Average maturity years	RWA \$m	RWA density %
Corporate							
0.00 to <0.15	1,814	0.10%	63	50%	2.9	689	38%
0.15 to <0.25	1,001	0.19%	63	43%	3.3	517	52%
0.25 to <0.50	985	0.35%	123	46%	2.8	689	70%
0.50 to <0.75	697	0.62%	21	50%	3.3	731	105%
0.75 to <2.50	44	1.35%	51	50%	1.1	44	99%
2.50 to <10.00	2	6.04%	10	50%	1.0	4	173%
10.00 to <100.00	221	23.43%	36	50%	5.0	723	328%
Sub-total	4,764	1.34%	367	48%	3.1	3,397	71%
Sovereign							
0.00 to <0.15	2,099	0.02%	33	5%	2.4	22	1%
0.75 to <2.50	2	1.35%	1	50%	1.0	2	101%
Sub-total	2,101	0.02%	34	5%	2.4	24	1%
Financial institution							
0.00 to <0.15	19,505	0.07%	698	50%	1.1	4,576	23%
0.15 to <0.25	1,287	0.18%	135	50%	1.6	678	53%
0.25 to <0.50	263	0.35%	73	50%	1.1	181	69%
0.50 to <0.75	16	0.62%	14	50%	0.8	14	89%
0.75 to <2.50	165	1.39%	68	50%	0.2	182	110%
2.50 to <10.00	1	3.67%	12	50%	0.6	2	164%
10.00 to <100.00	1	23.43%	1	50%	2.8	3	302%
Sub-total	21,238	0.09%	1,001	50%	1.1	5,636	27%
Total subject to F-IRB approach	28,103	0.30%	1,402	46%	1.6	9,057	32%

CCR5: Composition of collateral for CCR exposures

The following table provides details of collateral received and posted to reduce or support counterparty credit risk exposures related to derivative transactions and SFTs, including transactions cleared through CCPs. In the disclosure of collateral for counterparty credit risk exposures:

- Only collateral that impacts the calculation of EaD is included. Amounts reflect the fair value of collateral received and posted and are reported after considering any applicable haircuts. Application of a haircut has the effect of reducing the fair value of collateral received and increasing the value of collateral posted.
- Segregated collateral in derivative transactions refers to collateral which is held in a bankruptcy-remote manner.

	As at 31 Mar 25					
	Collateral used in derivative transactions				Collateral used in SFTs	
	Fair value of collateral received		Fair value of collateral posted		Fair value of collateral received	Fair value of collateral posted
	Segregated	Unsegregated	Segregated	Unsegregated		
	\$m	\$m	\$m	\$m	\$m	\$m
Cash - domestic currency	-	532	-	460	18,505	44,229
Cash - other currencies	-	4,161	-	4,837	53,069	76,046
Domestic sovereign debt	58	-	-	-	36,725	16,351
Other sovereign debt	664	260	-	-	60,370	44,134
Corporate and financial institution bonds	-	-	-	-	17,008	13,453
Equity securities	-	-	-	-	2,103	1,972
Total	722	4,953	-	5,297	187,780	196,185

Counterparty credit risk (cont.)

CCR6: Credit derivatives exposures

The following table provides details of credit derivative transactions broken down between derivatives bought or sold.

	As at 31 Mar 25	
	Protection bought	Protection sold
	\$m	\$m
Notionals		
Single-name credit default swaps	485	1,204
Index credit default swaps	4,347	1,651
Total notionals	4,832	2,855
Fair values		
Positive fair value (asset)	-	41
Negative fair value (liability)	(84)	-

CCR8: Exposures to central counterparties

The following table provides exposures to QCCPs by type of exposure. The Level 2 Group does not have any exposures to non-QCCPs.

	As at 31 Mar 25	
	EaD post-CRM	RWA
	\$m	\$m
1 Exposures to QCCPs (total)		359
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions), of which:	2,564	89
3 Over-the-counter derivatives	2,049	71
- of which: RBNZ regulated banking subsidiary	403	8
4 Exchange-traded derivatives	282	13
- of which: RBNZ regulated banking subsidiary	3	1
5 SFTs	233	5
7 Segregated initial margin	1,618	
8 Non-segregated initial margin	429	9
9 Pre-funded default fund contributions	309	261

Securitisation

SEC1: *Securitisation exposures in the banking book* and SEC2: *Securitisation exposures in the trading book* provide a comprehensive view of the Level 2 Group's securitisation activities, and include securitisation exposures of the RBNZ regulated banking subsidiary that are subject to RBNZ's credit risk framework. Securitisation exposures of the RBNZ regulated banking subsidiary are also disclosed in the credit risk and counterparty credit risk sections of this report, as applicable.

In contrast, securitisation exposures and associated regulatory capital requirements in SEC3 and SEC4 provide those securitisation exposures within the scope of APS 120.

In these disclosures:

- Bank acts as originator refers to where the Group originates underlying exposures in the pool, is the managing ADI for the securitisation or provides a facility (other than a derivatives transaction) or credit enhancement to an asset-backed commercial paper securitisation. Group originated exposures comprise:
 - Capital relief – significant risk transfer of the underlying exposure is achieved for regulatory purposes.
 - Funding only – significant risk transfer is not achieved.
 - Internal residential mortgage-backed securities – securities are issued and held internally for contingent liquidity purposes (also known as self-securitisation).
- Bank acts as investor refers to where the Level 2 Group holds investments in third-party securitisation exposures.
- Traditional securitisation refers to where a pool of underlying exposures is transferred or assigned to and held by a special purpose vehicle. The Level 2 Group does not have any synthetic securitisation exposures.

SEC1: Securitisation exposures in the banking book

The following table provides the carrying value of securitisation exposures in the banking book. In addition to these carrying values, the EaD of derivatives provided to securitisation vehicles where the Level 2 Group acts as the originator was \$23 million (30 September 2024: \$34 million).

March 2025 v September 2024

Securitisation exposures in the banking book originated by the Level 2 Group decreased by \$502 million or 0.4% due to repayment of the underlying securitised mortgages, as well as foreign exchange translation impacts.

	As at 31 Mar 25		As at 30 Sep 24	
	Bank acts as originator	Bank acts as investor	Bank acts as originator	Bank acts as investor
	Traditional	Traditional	Traditional	Traditional
	\$m	\$m	\$m	\$m
1 Retail (total)	142,888	19,292	143,390	20,712
2 of which: residential mortgage	142,888	15,867	143,390	17,103
3 of which: credit card	-	37	-	117
4 of which: other retail	-	3,388	-	3,492
6 Wholesale (total)	-	5,500	-	5,124
7 of which: loans to corporates	-	1,019	-	1,668
8 of which: commercial mortgage	-	271	-	19
9 of which: lease and receivables	-	1,509	-	1,095
10 of which: other wholesale	-	2,701	-	2,342

SEC2: Securitisation exposures in the trading book

The following table provides the EaD of securitisation exposures in the trading book.

	As at	
	31 Mar 25	30 Sep 24
	Bank acts as investor	Bank acts as investor
	Traditional	Traditional
	\$m	\$m
1 Retail (total)	360	544
2 of which: residential mortgage	229	424
3 of which: credit card	6	6
4 of which: other retail	125	114
6 Wholesale (total)	120	122
7 of which: loans to corporates	6	11
8 of which: commercial mortgage	1	1
10 of which: other wholesale	113	110

Securitisation (cont.)

SEC3: Securitisation exposures in the banking book and associated regulatory capital requirements – bank acting as originator or as sponsor

The following table provides securitisation exposures in the banking book where the Level 2 Group acts as originator, and the associated RWA. The Level 2 Group does not act as sponsor.

		As at 31 Mar 25								
		EaD (by risk-weight bands)		EaD (by regulatory approach)			RWA (by regulatory approach)		Capital charge after cap ⁽¹⁾	
		≤20%	1,250%	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	1,250% ⁽⁴⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾
		\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
1	Total exposures	65	5	62	3	5	12	-	1	-
2	Traditional securitisation	65	5	62	3	5	12	-	1	-
3	of which: securitisation	65	5	62	3	5	12	-	1	-
4	of which: retail underlying	65	5	62	3	5	12	-	1	-

(1) RWA divided by 12.5. The capital charge is based on RWA after the application of any risk-weight cap that may apply under APS 120.

(2) Securitisation external ratings-based approach in APS 120.

(3) Securitisation supervisory formula approach in APS 120.

(4) Exposures which would have a 1,250% risk-weight under Basel III requirements are deducted from CET1 capital under APRA requirements.

		As at 30 Sep 24								
		EaD (by risk-weight bands)		EaD (by regulatory approach)			RWA (by regulatory approach)		Capital charge after cap ⁽¹⁾	
		≤20%	1,250%	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	1,250% ⁽⁴⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾
		\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
1	Total exposures	82	8	78	4	8	16	1	1	-
2	Traditional securitisation	82	8	78	4	8	16	1	1	-
3	of which: securitisation	82	8	78	4	8	16	1	1	-
4	of which: retail underlying	82	8	78	4	8	16	1	1	-

(1) RWA divided by 12.5. The capital charge is based on RWA after the application of any risk-weight cap that may apply under APS 120.

(2) Securitisation external ratings-based approach in APS 120.

(3) Securitisation supervisory formula approach in APS 120.

(4) Exposures which would have a 1,250% risk-weight under Basel III requirements are deducted from CET1 capital under APRA requirements.

Securitisation (cont.)

SEC4: Securitisation exposures in the banking book and associated capital requirements – bank acting as investor

The following table provides securitisation exposures in the banking book where the bank acts as investor, and the associated RWA.

March 2025 v September 2024

Securitisation exposure investments in the banking book decreased by \$797 million or 2.5%, primarily driven by lower securities holdings. The \$3.5 billion increase in securitisation exposures in the >20-50% risk-weight band is due to a slight decline in credit quality of a small number of warehouse exposures.

		As at 31 Mar 25								
		EaD (by risk-weight bands)			EaD (by regulatory approach)		RWA (by regulatory approach)		Capital charge after cap ⁽¹⁾	
		≤20%	>20% to 50%	>50% to 100%	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾
		\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
1	Total exposures	26,890	4,043	96	7,204	23,825	1,483	4,049	118	324
2	Traditional securitisation	26,890	4,043	96	7,204	23,825	1,483	4,049	118	324
3	of which: securitisation	26,890	4,043	96	7,204	23,825	1,483	4,049	118	324
4	of which: retail underlying	21,004	3,568	96	5,436	19,232	1,128	3,292	90	263
6	of which: wholesale	5,886	475	-	1,768	4,593	355	757	28	61

(1) RWA divided by 12.5. The capital charge is based on RWA after the application of any risk-weight cap that may apply under APS 120.

(2) Securitisation external ratings-based approach in APS 120.

(3) Securitisation supervisory formula approach in APS 120.

		As at 30 Sep 24								
		EaD (by risk-weight bands)			EaD (by regulatory approach)		RWA (by regulatory approach)		Capital charge after cap ⁽¹⁾	
		≤20%	>20% to 50%	>50% to 100%	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾	SEC- ERBA ⁽²⁾	SEC- SFA ⁽³⁾
		\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
1	Total exposures	31,166	537	123	8,323	23,503	1,690	3,662	135	293
2	Traditional securitisation	31,166	537	123	8,323	23,503	1,690	3,662	135	293
3	of which: securitisation	31,166	537	123	8,323	23,503	1,690	3,662	135	293
4	of which: retail underlying	25,066	47	122	6,319	18,916	1,296	2,890	103	231
6	of which: wholesale	6,100	490	1	2,004	4,587	394	772	32	62

(1) RWA divided by 12.5. The capital charge is based on RWA after the application of any risk-weight cap that may apply under APS 120.

(2) Securitisation external ratings-based approach in APS 120.

(3) Securitisation supervisory formula approach in APS 120.

Market risk

Market risk risk-weighted assets

The following table provides a breakdown of market risk RWA by approach.

	As at	
	31 Mar 25	30 Sep 24
	\$m	\$m
Market risk RWA under the internal model approach	11,318	10,694
Market risk RWA under the standard method		
Interest rate risk	768	729
Equity position risk	8	4
Total market risk RWA under the standard method	776	733
Total	12,094	11,427

Internal model approach value at risk and stressed value at risk

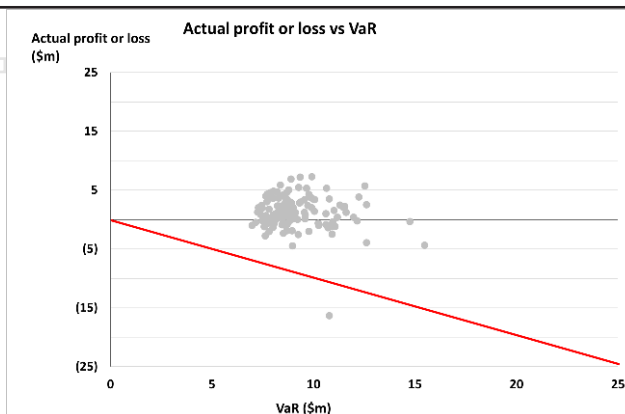
The following table provides information on the mean, minimum and maximum value at risk (VaR) and stressed VaR over the reporting period and at period end. VaR and stressed VaR provided are based on a 10-day holding period.

	6 months ended 31 Mar 25			As at
	Mean value	Minimum value	Maximum value	31 Mar 25
	\$m	\$m	\$m	\$m
At a 99% confidence level				
VaR	27.4	15.1	50.6	25.9
Stressed VaR	130.1	77.2	257.4	106.6
	6 months ended 30 Sep 24			As at
	Mean value	Minimum value	Maximum value	30 Sep 24
	\$m	\$m	\$m	\$m
At a 99% confidence level				
VaR	33.7	22.7	67.5	29.9
Stressed VaR	133.9	81.6	216.5	160.4

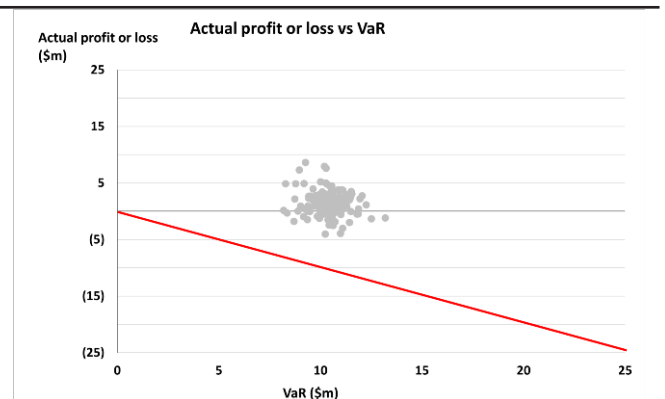
Back-testing results

The following graphs compare the Group's daily VaR estimates against actual profit or loss. Actual trading outcomes are adjusted to remove the impact of intra-day trading and factors other than market movements alone. The red line represents a one-to-one relationship between negative actual profit or loss and VaR, which is an indicator of the VaR model's performance.

Results for the six months ended 31 March 2025



Results for the six months ended 30 September 2024



Back-testing, carried out by comparing the Group's daily VaR estimate against actual profit or loss, identified one exception during the six months ended 31 March 2025 (nil for the six months ended 30 September 2024). This exception occurred in December 2024 with actual profit or loss of \$16 million measured against a VaR estimate of \$11 million. This remains within the model parameters and indicates acceptable operation of the VaR model within APRA's guidelines.

Operational risk

Under APS 115 *Capital Adequacy: Standardised Measurement Approach to Operational Risk*, operational risk capital is derived from the business indicator, a financial statement proxy of operational risk exposure. The business indicator is based on the average of the most recent three years of audited year-end financial reports, updated as part of 31 December reporting each year following finalisation of the year-end financial report.

The annual templates OR2: *Business indicator and subcomponents* and OR3: *Minimum required operational risk capital* have been included in this report to provide information on a more timely basis.

March 2025 v September 2024

Operational risk RWA increased by \$1.9 billion or 5.2%. This was mainly due to an increase in the interest, lease and dividend component of the business indicator due to higher net interest and lease income in the 2024 financial year compared to the 2021 financial year which is no longer in the three-year average. Net interest and lease income (row 1a less row 1b in OR2) increased from \$14.0 billion in the 2021 financial year to \$16.4 billion in the 2024 financial year due to lending growth and a higher interest rate environment.

OR2: Business indicator and subcomponents

The following table provides the business indicator and its subcomponents, which informed the operational risk capital from 31 December 2024 to 31 March 2025, as set out in OR3: *Minimum required operational risk capital*.

		For the year ended 30 September		
		2024	2023	2022
		\$m	\$m	\$m
Business indicator and its subcomponents				
1	Interest, lease and dividend component⁽¹⁾⁽²⁾	15,960		
1a	Interest and lease income	58,303	48,078	22,853
1b	Interest and lease expense	41,867	31,623	7,988
1c	Interest earning assets ⁽³⁾	985,457	963,355	938,351
1d	Dividend income	16	15	93
2	Services component⁽¹⁾⁽⁴⁾	2,503		
2a	Fee and commission income	2,221	2,210	2,210
2b	Fee and commission expense	23	46	54
2c	Other operating income	443	117	306
2d	Other operating expense	212	105	112
3	Financial component⁽¹⁾⁽⁵⁾	1,325		
3a	Net profit or loss on the trading book	657	783	424
3b	Net profit or loss on the banking book	526	747	839
4	Business indicator⁽¹⁾	19,788		
5	Business indicator component ⁽¹⁾⁽⁶⁾	2,923		

(1) The business indicator and its components, representing averages of the most recent three financial years, are presented in the column for the most recent financial year, consistent with the disclosure template prescribed by APS 330.

(2) The interest, lease and dividend component is calculated as the lesser of the average of net interest and lease income and 2.25% of interest earning assets, plus the average of dividend income.

(3) Interest earning assets as at the end of each financial year.

(4) The services component is calculated as the higher of the average of fee and commission income and expense, plus the higher of the average of other operating income and expense.

(5) The financial component is calculated as the sum of the average of net profit or loss on the trading and banking book.

(6) Calculated as the business indicator multiplied by 12%, plus 3% of the amount by which the business indicator exceeds \$1.5 billion.

Operational risk (cont.)

The following table provides the business indicator and its subcomponents, which informed the operational risk capital from 31 December 2023 to 30 September 2024, as set out in OR3: *Minimum required operational risk capital*.

	For the year ended 30 September		
	2023	2022	2021
	\$m	\$m	\$m
Business indicator and its subcomponents			
1 Interest, lease and dividend component⁽¹⁾⁽²⁾	15,153		
1a Interest and lease income	48,078	22,853	18,696
1b Interest and lease expense	31,623	7,988	4,706
1c Interest earning assets ⁽³⁾	963,355	938,351	860,428
1d Dividend income	15	93	40
2 Services component⁽¹⁾⁽⁴⁾	2,408		
2a Fee and commission income	2,210	2,210	2,281
2b Fee and commission expense	46	54	111
2c Other operating income	117	306	99
2d Other operating expense	105	112	118
3 Financial component⁽¹⁾⁽⁵⁾	1,175		
3a Net profit or loss on the trading book	783	424	423
3b Net profit or loss on the banking book	747	839	310
4 Business indicator⁽¹⁾	18,736		
5 Business indicator component ⁽¹⁾⁽⁶⁾	2,765		

(1) The business indicator and its components, representing averages of the most recent three financial years, are presented in the column for the most recent financial year, consistent with the disclosure template prescribed by APS 330.

(2) The interest, lease and dividend component is calculated as the lesser of the average of net interest and lease income and 2.25% of interest earning assets, plus the average of dividend income.

(3) Interest earning assets as at the end of each financial year.

(4) The services component is calculated as the higher of the average of fee and commission income and expense, plus the higher of the average of other operating income and expense.

(5) The financial component is calculated as the sum of the average of net profit or loss on the trading and banking book.

(6) Calculated as the business indicator multiplied by 12%, plus 3% of the amount by which the business indicator exceeds \$1.5 billion.

OR3: Minimum required operational risk capital

The following table presents the operational risk regulatory capital requirements.

	As at	
	31 Mar 25	30 Sep 24
	\$m	\$m
1 Business indicator component	2,923	2,765
2 Internal loss multiplier ⁽¹⁾	1.0	1.0
- Other regulatory capital charges	116	123
3 Minimum required operational risk capital ⁽²⁾	3,039	2,888
4 Operational risk RWA ⁽³⁾	37,985	36,102

(1) APS 115 does not include an internal loss multiplier, which is a scaling factor based on average historical losses, in the calculation of operational risk capital.

(2) Calculated as the business indicator component, multiplied by the internal loss multiplier, plus other regulatory capital charges.

(3) Operational risk RWA is operational risk capital multiplied by 12.5.

Liquidity

10.1 Liquidity coverage ratio

The LCR measures the adequacy of HQLA available to meet net cash outflows over a 30-day period during a severe liquidity stress scenario. The Board sets LCR targets above regulatory minimums and the Group manages its LCR position daily across the legal entity structure, major currencies and jurisdictions in which business activities are undertaken. The APRA minimum LCR is 100%.

A prudent funding strategy seeks to ensure appropriate diversification and limits maturity concentrations. This approach is designed to provide a relatively stable LCR profile over time.

The Group's mix of liquid assets primarily consists of HQLA, such as cash, deposits with central banks, Australian government and semi-government securities and securities issued by foreign sovereigns. The currency mix of these holdings is set with reference to the currency of the underlying liquidity risk to support all regulatory and internal requirements being met. Liquid assets surplus to APRA minimums in New Zealand dollars are not included in LCR for the Level 2 Group, reflecting constraints on transferability. The currency mismatch of liquidity risk is managed through the LCR, as well as via other internal metrics, and informs the currency, composition, and location of HQLA held.

The LCR for the three months ended 31 March 2025 and 31 December 2024 are presented in LIQ1: *Liquidity coverage ratio*, and are based on a simple average of daily LCR outcomes excluding non-business days. There were 61 daily LCR data points used in calculating the average for the most recent quarter and 64 observations in the previous quarter.

March 2025 v December 2024

Average LCR for the three months ended 31 March 2025 remained unchanged at 139%, with a \$1.4 billion or 0.6% decrease in average liquid assets, and a \$1.7 billion or 1.1% decrease in average weighted net cash outflows. Average liquid assets decreased as a result of a reduction in wholesale funding, partially offset by growth in customer deposits. The decrease in average net cash outflows was largely due to a modelling change in derivative collateral requirements, partially offset by an increase in average cash outflows from wholesale deposits and unsecured wholesale funding in the 30-day stress period reflecting variability in the Group's refinancing profile.

Liquidity coverage ratio (cont.)

LIQ1: Liquidity coverage ratio

		3 months ended			
		31 Mar 25		31 Dec 24	
		Total unweighted value (average) ⁽¹⁾ \$m	Total weighted value (average) \$m	Total unweighted value (average) ⁽¹⁾ \$m	Total weighted value (average) \$m
HQLA					
1	Total HQLA ⁽²⁾⁽³⁾⁽⁴⁾		212,309		213,659
-	of which: alternative liquid assets ⁽³⁾		3,529		1,954
-	of which: RBNZ eligible securities ⁽³⁾⁽⁴⁾		3,529		1,954
Cash outflows					
2	Retail deposits and deposits from small business customers	293,951	30,409	291,167	29,694
3	of which: stable deposits	131,255	6,563	131,596	6,580
4	of which: less stable deposits	162,696	23,846	159,571	23,114
5	Unsecured wholesale funding	176,515	86,406	171,542	82,291
6	of which: operational deposits (all counterparties) and deposits in networks of cooperative banks	90,751	22,688	87,546	21,887
7	of which: non-operational deposits (all counterparties)	70,294	48,248	70,276	46,684
8	of which: unsecured debt	15,470	15,470	13,720	13,720
9	Secured wholesale funding ⁽³⁾		17,082		14,812
10	Additional requirements	216,749	36,370	214,877	42,385
11	of which: outflows related to derivative exposures and other collateral requirements	6,478	6,476	12,706	12,700
12	of which: outflows related to loss of funding on debt products	-	-	-	-
13	of which: credit and liquidity facilities	210,271	29,894	202,171	29,685
14	Other contractual funding obligations	462	462	231	231
15	Other contingent funding obligations	83,287	5,253	87,666	5,700
16	Total cash outflows		175,982		175,113
Cash inflows					
17	Secured lending (e.g. reverse repos)	64,298	7,862	53,301	5,338
18	Inflows from fully performing exposures	20,502	12,837	20,311	13,128
19	Other cash inflows	2,790	2,787	2,417	2,411
20	Total cash inflows	87,590	23,486	76,029	20,877
			Total adjusted value		Total adjusted value
			\$m		\$m
21	Total HQLA⁽²⁾		212,309		213,659
22	Total net cash outflows		152,496		154,236
23	LCR (%)		139%		139%

(1) Unweighted inflow and outflow values are outstanding balances maturing or callable within 30 days.

(2) Total HQLA represents liquid assets, including assets qualifying under alternative liquidity approaches.

(3) Disclosed on a weighted basis only, consistent with the disclosure template prescribed by APS 330.

(4) Weighted values exclude New Zealand dollar (NZD) liquid asset holdings in excess of NZD LCR of 100%, reflecting liquidity transferability considerations. The average amount excluded during the three months to 31 March 2025 and 31 December 2024 was \$6.3 billion and \$7.8 billion, respectively.

10.2 Net stable funding ratio

The NSFR measures the extent to which assets are funded with stable sources of funding in order to mitigate the risk of future funding stress. ASF is calculated by applying weightings to capital and liabilities to reflect the portion that is expected to be available over a one-year time horizon. The maturity of funding is taken as being the earliest date at which the funding can be withdrawn. RSF reflects the liquidity characteristics of the assets and the expectation that these assets and off-balance sheet exposures will require funding over the next year. The maturity of assets is taken as being the latest possible date at which the asset may mature. The APRA minimum NSFR is 100%.

The NSFR as at 31 March 2025 and 31 December 2024 are presented in LIQ2: *Net stable funding ratio*, and are based on spot balances.

March 2025 v December 2024

The NSFR increased to 119%, with an \$8.3 billion or 1.2% increase in ASF, partially offset by a \$2.7 billion or 0.5% increase in RSF. The increase in ASF was driven by deposit growth, mostly across retail and small business customers, combined with an increase in regulatory capital. The increase in RSF was primarily due to higher RSF required on lending and reverse repurchase exposures, partially offset by lower derivative exposures.

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Net stable funding ratio (cont.)

LIQ2: Net stable funding ratio

		As at 31 Mar 25				
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1 year	≥ 1 year	
		\$m	\$m	\$m	\$m	\$m
ASF item						
1	Capital, comprising:	64,109	-	-	34,677	98,786
2	Regulatory capital	64,109	-	-	34,677	98,786
3	Other capital instruments	-	-	-	-	-
4	Retail deposits and deposits from small business customers, comprising:	277,149	94,907	639	101	342,756
5	Stable deposits	127,031	17,574	-	-	137,375
6	Less stable deposits	150,118	77,333	639	101	205,381
7	Wholesale funding, comprising:	135,311	262,836	60,065	122,256	257,299
8	Operational deposits	92,239	-	-	-	46,120
9	Other wholesale funding	43,072	262,836	60,065	122,256	211,179
10	Liabilities with matching interdependent assets	-	-	-	-	-
11	Other liabilities, comprising:	-	15,632	-	4,626	4,626
12	NSFR derivative liabilities ⁽¹⁾			5,626		
13	All other liabilities and equity not included in the above categories	-	10,006	-	4,626	4,626
14	Total ASF					703,467
RSF item						
15	Total NSFR HQLA					5,046
-	of which: alternative liquid assets					382
-	of which: RBNZ eligible securities					382
16	Deposits held at other financial institutions for operational purposes	-	-	-	-	-
17	Performing loans and securities, comprising:	24,895	199,068	61,542	572,661	538,409
18	Performing loans to financial institutions secured by Level 1 HQLA	-	72,382	4,466	-	9,471
19	Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions	1,233	53,771	11,493	24,492	39,689
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and public sector entities	14,950	65,246	39,573	147,541	188,042
21	of which: with a risk-weight of less than or equal to 35% under APS 112 ⁽²⁾	-	2,019	1,421	4,868	4,884
22	Performing residential mortgages	8,705	4,733	4,861	396,210	293,492
-	of which: standard loans to individuals with a loan-to-valuation ratio of 80% or below ⁽³⁾	6,012	-	-	267,935	178,065
24	Securities that are not in default and do not qualify as HQLA, including exchange-traded equities	7	2,936	1,149	4,418	7,715
25	Assets with matching interdependent liabilities	-	-	-	-	-
26	Other assets, comprising:	14,426	3,434	118	37,920	37,935
27	Physical traded commodities, including gold	313				266
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs ⁽¹⁾			2,380		2,023
29	NSFR derivative assets ⁽¹⁾			7,270		1,644
30	NSFR derivative liabilities before deduction of variation margin posted ⁽¹⁾			11,755		2,351
31	All other assets not included in the above categories	14,113	3,434	118	16,515	31,651
32	Off-balance sheet items ⁽¹⁾			223,202		11,078
33	Total RSF					592,468
34	NSFR (%)					119%

(1) Disclosed in total and not by maturity bucket, consistent with the disclosure template prescribed by APS 330.

(2) The description of row 21 has been modified from that set out in the BCBS *Disclosure Requirements* standard to align with APS 210.

(3) Comprises performing, unencumbered standard residential property loans to individuals with a residual maturity of one year or more, or no defined maturity, and a LVR of 80% or below, as defined under APS 112.

Net stable funding ratio (cont.)

As at 31 Dec 24

ASF item	Unweighted value by residual maturity				Weighted value \$m
	No maturity	< 6 months	6 months to < 1 year	≥ 1 year	
	\$m	\$m	\$m	\$m	
1 Capital, comprising:	62,606	-	-	32,797	95,403
2 Regulatory capital	62,606	-	-	32,797	95,403
3 Other capital instruments	-	-	-	-	-
4 Retail deposits and deposits from small business customers, comprising:	275,305	91,121	638	18	337,584
5 Stable deposits	126,863	17,279	-	-	136,935
6 Less stable deposits	148,442	73,842	638	18	200,649
7 Wholesale funding, comprising:	126,979	299,839	55,394	123,727	257,363
8 Operational deposits	89,839	-	-	-	44,919
9 Other wholesale funding	37,140	299,839	55,394	123,727	212,444
10 Liabilities with matching interdependent assets	-	-	-	-	-
11 Other liabilities, comprising:	-	17,801	-	4,820	4,820
12 NSFR derivative liabilities ⁽¹⁾			7,328		
13 All other liabilities and equity not included in the above categories	-	10,473	-	4,820	4,820
14 Total ASF					695,170
RSF item					
15 Total NSFR HQLA					5,376
of which: alternative liquid assets					275
of which: RBNZ eligible securities					275
16 Deposits held at other financial institutions for operational purposes	-	-	-	-	-
17 Performing loans and securities, comprising:	31,681	187,899	68,625	561,357	533,235
18 Performing loans to financial institutions secured by Level 1 HQLA	-	70,172	2,970	-	8,502
19 Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions	1,069	45,166	13,838	20,258	35,021
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and public sector entities	20,509	63,816	46,627	141,234	188,050
21 of which: with a risk-weight of less than or equal to 35% under APS 112 ⁽²⁾	-	6,368	3,177	7,742	9,805
22 Performing residential mortgages	8,831	4,357	4,576	395,384	293,178
of which: standard loans to individuals with a loan-to-valuation ratio of 80% or below ⁽³⁾	6,104	-	-	271,585	180,497
24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities	1,272	4,388	614	4,481	8,484
25 Assets with matching interdependent liabilities	-	-	-	-	-
26 Other assets, comprising:	14,224	3,670	80	43,390	40,271
27 Physical traded commodities, including gold	316				268
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs ⁽¹⁾			2,841		2,415
29 NSFR derivative assets ⁽¹⁾			11,117		3,789
30 NSFR derivative liabilities before deduction of variation margin posted ⁽¹⁾			16,295		3,259
31 All other assets not included in the above categories	13,908	3,670	80	13,137	30,540
32 Off-balance sheet items ⁽¹⁾			218,855		10,868
33 Total RSF					589,750
34 NSFR (%)					118%

(1) Disclosed in total and not by maturity bucket, consistent with the disclosure template prescribed by APS 330.

(2) The description of row 21 has been modified from that set out in the BCBS *Disclosure Requirements* standard to align with APS 210.

(3) Comprises performing, unencumbered standard residential property loans to individuals with a residual maturity of one year or more, or no defined maturity, and a LVR of 80% or below, as defined under APS 112.

Asset encumbrance

ENC: Asset encumbrance

The table below provides the carrying value of encumbered and unencumbered assets of the Group. The difference between assets of the Group and the Level 2 Group is set out in CC2: *Reconciliation of regulatory capital to balance sheet*, and mainly relates to securitisation special purpose vehicles to which residential mortgages have been transferred in accordance with the requirements for regulatory capital relief in APS 120.

For the purposes of this disclosure, encumbered assets are assets that the Group is restricted or prevented from liquidating, selling, transferring or assigning due to legal, regulatory, contractual or other limitations. This definition differs to that used for the purposes of the LCR.

Assets are encumbered to access funding via repurchase agreements and covered bonds, and to meet collateral obligations under derivative transactions and repurchase agreements. Where assets held are pledged under derivative transactions or repurchase agreements, the Group retains substantially all of the risks and rewards of ownership of the assets and consequently the assets are not derecognised from the balance sheet.

March 2025 v September 2024

Encumbered assets decreased by \$3.2 billion or 2.7% primarily due to a decrease in cash collateral placed under derivative transactions, combined with a decrease in encumbered residential mortgages. This was partially offset by an increase in regulatory minimum deposits with certain central and other banks.

Encumbered trading assets and debt instruments were largely unchanged with a reduction in encumbered physical securities largely offset by an increase in pledges of securities received under reverse repurchase agreements.

Assets	As at 31 Mar 25		Total \$m
	Encumbered assets \$m	Unencumbered assets \$m	
Cash and liquid assets	-	1,433	1,433
Due from other banks ⁽¹⁾	3,854	91,011	94,865
Collateral placed ⁽²⁾	6,971	-	6,971
Trading assets and debt instruments ⁽³⁾	62,044	136,500	198,544
of which: government and semi-government bonds, notes and securities	5,065	75,812	80,877
of which: other debt and equity securities	2,454	9,728	12,182
of which: reverse repurchase agreements	54,525	50,145	104,670
Derivative assets	-	24,243	24,243
Other financial assets	-	764	764
Loans and advances	41,300	709,521	750,821
of which: residential mortgages (gross of provision for credit impairment) ⁽⁴⁾⁽⁵⁾	41,300	384,977	426,277
All other assets	-	17,998	17,998
Total assets	114,169	981,470	1,095,639

(1) Encumbered amounts due from other banks comprise regulatory minimum deposits placed with certain central and other banks. Unencumbered amounts due from other banks include exchange settlement accounts with the RBA and RBNZ.

(2) Encumbered collateral placed comprises initial and variation margin posted in the form of cash, primarily under derivative margining agreements.

(3) Encumbered trading assets and debt instruments primarily comprise debt securities encumbered under repurchase agreements for trading or short-term funding and liquidity purposes. Debt securities are also pledged under derivative margining agreements.

(4) Encumbered assets include \$35.0 billion of residential mortgages encumbered under NAB and BNZ covered bond programmes, where Group-originated residential mortgages are allocated to the cover asset pool as remote specific securities backing covered bond issuances.

(5) Unencumbered assets include repo-eligible residential mortgage-backed securities. Under APG 210 *Liquidity*, the Level 2 Group holds self-securitised assets free from encumbrance to a minimum of 30% of Australian dollar net cash outflows in the LCR as contingency for periods of stress.

Asset encumbrance (cont.)

As at 30 Sep 24

Assets	Encumbered assets	Unencumbered assets	Total
	\$m	\$m	\$m
Cash and liquid assets	-	2,499	2,499
Due from other banks ⁽¹⁾	2,580	107,858	110,438
Collateral placed ⁽²⁾	9,633	-	9,633
Trading assets and debt instruments ⁽³⁾	61,922	113,683	175,605
of which: government and semi-government bonds, notes and securities	12,638	60,302	72,940
of which: other debt and equity securities	2,168	12,609	14,777
of which: reverse repurchase agreements	47,116	40,699	87,815
Derivative assets	-	28,766	28,766
Other financial assets	-	769	769
Loans and advances	43,257	689,435	732,692
of which: residential mortgages (gross of provision for credit impairment) ⁽⁴⁾⁽⁵⁾	43,257	373,501	416,758
All other assets	-	19,846	19,846
Total assets	117,392	962,856	1,080,248

(1) Encumbered amounts due from other banks comprise regulatory minimum deposits placed with certain central and other banks. Unencumbered amounts due from other banks include exchange settlement accounts with the RBA and RBNZ.

(2) Encumbered collateral placed comprises initial and variation margin posted in the form of cash, primarily under derivative margining agreements.

(3) Encumbered trading assets and debt instruments primarily comprise debt securities encumbered under repurchase agreements for trading or short-term funding and liquidity purposes. Debt securities are also pledged under derivative margining agreements.

(4) Encumbered assets include \$35.5 billion of residential mortgages encumbered under NAB and BNZ covered bond programmes, where Group originated residential mortgages are allocated to the cover asset pool as remote specific securities backing covered bond issuances.

(5) Unencumbered assets include repo-eligible residential mortgage-backed securities. Under APG 210, the Level 2 Group holds self-securitised assets free from encumbrance to a minimum of 30% of Australian dollar net cash outflows in the LCR as contingency for periods of stress.

Accountable Person attestation

The Group Chief Financial Officer, an Accountable Person of National Bank Australia Limited, attests that the 2025 Half Year Pillar 3 Report has been prepared in accordance with the Group External Reporting Policy.



Shaun Dooley
Group Chief Financial Officer
7 May 2025

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Disclosure requirements index

The following table sets out the disclosure requirements of the BCBS *Disclosure Requirements* standard, including the reporting frequency, and where the disclosure is made if included in this report.

BCBS <i>Disclosure Requirements</i> standard tables and templates			Reporting frequency	Pillar 3 Report section, or comment
DIS20: Overview of risk management, key prudential metrics and risk-weighted assets (RWA)	KM1	Key metrics (at consolidated group level)	Quarterly	Section 2 <i>Overview of key metrics and RWA</i>
	KM2	Key metrics - total loss-absorbing capacity (TLAC) requirements (at resolution group level)	N/A as only required for global systemically important banks (G-SIBs)	
	OVA	Bank risk management approach	Annual	-
	OV1	Overview of RWA	Quarterly	Section 2 <i>Overview of key metrics and RWA</i>
DIS21: Comparison of modelled and standardised RWA	CMS1	Comparison of modelled and standardised RWA at risk level	Quarterly	Section 2 <i>Overview of key metrics and RWA</i>
	CMS2	Comparison of modelled and standardised RWA for credit risk at asset class level	Semi-annual	Section 2 <i>Overview of key metrics and RWA</i>
DIS25: Composition of capital and TLAC	CCA	Main features of regulatory capital instruments and of other TLAC-eligible instruments	Semi-annual ⁽¹⁾	Available at nab.com.au/about-us/shareholder-centre/regulatory-disclosures
	CC1	Composition of regulatory capital	Semi-annual	Section 3 <i>Capital</i>
	CC2	Reconciliation of regulatory capital to balance sheet	Semi-annual	Section 3 <i>Capital</i>
	TLAC1	TLAC composition for G-SIBs (at resolution group level)	N/A as only required for G-SIBs	
	TLAC2	Material subgroup entity - creditor ranking at legal entity level	N/A as only required for G-SIBs	
	TLAC3	Resolution entity - creditor ranking at legal entity level	N/A as only required for G-SIBs	
DIS26: Capital distribution constraints	CDC	Capital distribution constraints	APRA has not required this disclosure which is at the discretion of national supervisors	
DIS30: Links between financial statements and regulatory exposures	LIA	Explanations of differences between accounting and regulatory exposure amounts	Annual	-
	LI1	Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories	Annual ⁽²⁾	Section 4 <i>Links between financial statements and regulatory exposures</i>
	LI2	Main sources of differences between regulatory exposure amounts and carrying values in financial statements	Annual	-
	PV1	Prudent valuation adjustments (PVAs)	Not required under APS 330	
DIS31: Asset encumbrance	ENC	Asset encumbrance	Semi-annual	Section 11 <i>Asset encumbrance</i>
DIS35: Remuneration ⁽³⁾	REMA	Remuneration policy	Not required under APS 330	
	REM1	Remuneration awarded during financial year	Not required under APS 330	
	REM2	Special payments	Not required under APS 330	
	REM3	Deferred remuneration	Not required under APS 330	
DIS40: Credit risk	CRA	General qualitative information about credit risk	Annual	-
	CR1	Credit quality of assets	Semi-annual	Section 5 <i>Credit risk</i>
	CR2	Changes in stock of defaulted loans and debt securities	Semi-annual	Section 5 <i>Credit risk</i>
	CRB	Additional disclosure related to the credit quality of assets	Annual	-
	CRB-A	Additional disclosure related to prudential treatment of problem assets	APRA has not required this disclosure which is at the discretion of national supervisors	
	CRC	Qualitative disclosure related to credit risk mitigation (CRM) techniques	Annual	-
	CR3	CRM techniques - overview	Semi-annual	Section 5 <i>Credit risk</i>
	CRD	Qualitative disclosure on banks' use of external credit ratings under the standardised approach for credit risk	Annual	-
	CR4	Standardised approach - credit risk exposure and CRM effects	Semi-annual	Section 5 <i>Credit risk</i>
	CR5	Standardised approach - exposures by asset classes and risk-weights	Semi-annual	Section 5 <i>Credit risk</i>

(1) Disclosed quarterly to provide information on a more timely basis.

(2) Disclosed as additional information semi-annually to facilitate understanding of how carrying values in other disclosures correspond to amounts on the Group's balance sheet.

(3) Disclosure is made separately of the requirements set out in Prudential Standard CPS 511 *Remuneration* on an annual basis.

Disclosure requirements index (cont.)

BCBS Disclosure Requirements standard tables and templates			Reporting frequency	Pillar 3 report section, or comment
DIS40: Credit risk	CRE	Qualitative disclosure related to internal ratings-based (IRB) models	Annual	-
	CR6	IRB - credit risk exposures by portfolio and probability of default (PD) range	Semi-annual	Section 5 <i>Credit risk</i>
	CR7	IRB - effect on RWA of credit derivatives used as CRM techniques	Semi-annual	No credit derivatives are held for credit mitigation purposes at the end of the current or previous reporting period
	CR8	RWA flow statements of credit risk exposures under IRB	Quarterly	Section 5 <i>Credit risk</i>
	CR9	IRB - backtesting of PD per portfolio	Annual	-
	CR10	IRB - specialised lending under the slotting approach	Semi-annual	Section 5 <i>Credit risk</i>
	DIS42: Counterparty credit risk (CCR)	CCRA	Qualitative disclosure related to CCR	Annual
CCR1		Analysis of CCR exposures by approach	Semi-annual	Section 6 <i>Counterparty credit risk</i>
CCR3		Standardised approach - CCR exposures by regulatory portfolio and risk-weights	Semi-annual	Section 6 <i>Counterparty credit risk</i>
CCR4		IRB - CCR exposures by portfolio and PD scale	Semi-annual	Section 6 <i>Counterparty credit risk</i>
CCR5		Composition of collateral for CCR exposure	Semi-annual	Section 6 <i>Counterparty credit risk</i>
CCR6		Credit derivatives exposures	Semi-annual	Section 6 <i>Counterparty credit risk</i>
CCR7		RWA flow statements of CCR exposures under internal model method (IMM)		Not required under APS 330
CCR8		Exposures to central counterparties	Semi-annual	Section 6 <i>Counterparty credit risk</i>
DIS43: Securitisation	SECA	Qualitative disclosure requirements related to securitisation exposures	Annual	-
	SEC1	Securitisation exposures in the banking book	Semi-annual	Section 7 <i>Securitisation</i>
	SEC2	Securitisation exposures in the trading book	Semi-annual	Section 7 <i>Securitisation</i>
	SEC3	Securitisation exposures in the banking book and associated regulatory capital requirements - bank acting as originator or as sponsor	Semi-annual	Section 7 <i>Securitisation</i>
	SEC4	Securitisation exposures in the banking book and associated capital requirements - bank acting as investor	Semi-annual	Section 7 <i>Securitisation</i>
DIS45: Sovereign exposures	SOV1	Exposures to sovereign entities - country		APRA has not required this disclosure which is at the discretion of national supervisors
	SOV2	Exposures to sovereign entities - currency denomination breakdown		APRA has not required this disclosure which is at the discretion of national supervisors
	SOV3	Exposures to sovereign entities - accounting classification breakdown		APRA has not required this disclosure which is at the discretion of national supervisors
DIS50: Market risk ⁽¹⁾	MRA	General qualitative disclosure requirements related to market risk		Not required under APS 330
	MR1	Market risk under the standardised approach		Not required under APS 330
	MRB	Qualitative disclosures for banks using the internal models approach (IMA)		Not required under APS 330
	MR2	Market risk for banks using the IMA		Not required under APS 330
	MR3	Market risk under the simplified standardised approach		Not required under APS 330
DIS51: Credit valuation adjustment (CVA) risk	CVAA	General qualitative disclosure requirements related to CVA	Annual	-
	CVA1	The reduced basic approach for CVA (BA-CVA)		Not required under APS 330
	CVA2	The full BA-CVA		Not required under APS 330
	CVAB	Qualitative disclosures for banks using the standardised approach (SA-CVA)	Annual	-
	CVA3	The SA-CVA		Not required under APS 330
	CVA4	RWA flow statements of CVA risk exposures under SA-CVA		Not required under APS 330

(1) Disclosure is made of the quantitative requirements set out in APS 330 Attachment A paragraph 32 on a semi-annual basis in section 8 *Market risk*.

Disclosure requirements index (cont.)

BCBS <i>Disclosure Requirements</i> standard tables and templates			Reporting frequency	Pillar 3 report section, or comment
DIS60: Operational risk	ORA	General qualitative information on a bank's operational risk framework	Annual	-
	OR1	Historical losses	Annual	-
	OR2	Business indicator and subcomponents	Annual ⁽¹⁾	Section 9 <i>Operational risk</i>
	OR3	Minimum required operational risk capital	Annual ⁽¹⁾	Section 9 <i>Operational risk</i>
DIS70: Interest rate risk in the banking book (IRRBB)	IRRBBA	IRRBB risk management objectives and policies	Annual	-
	IRRBB1	Quantitative information on IRRBB	Annual	-
DIS75: Macroprudential supervisory measures	GSIB1	Disclosure of G-SIB indicators	Annual	G-SIB indicators are available at nab.com.au/about-us/shareholder-centre/regulatory-disclosures
	CCyB1	Geographical distribution of credit exposures used in the calculation of the bank-specific countercyclical capital buffer requirement	Semi-annual	Section 3 <i>Capital</i>
DIS80: Leverage ratio	LR1	Summary comparison of accounting assets vs leverage ratio exposure measure	Semi-annual	Section 3 <i>Capital</i>
	LR2	Leverage ratio common disclosure template	Quarterly	Section 3 <i>Capital</i>
DIS85: Liquidity	LIQA	Liquidity risk management	Annual	-
	LIQ1	Liquidity coverage ratio (LCR)	Quarterly	Section 10 <i>Liquidity</i>
	LIQ2	Net stable funding ratio (NSFR)	Semi-annual	Section 10 <i>Liquidity</i>

(1) Disclosed as additional information in this first report prepared under the revised APS 330 to provide information on a more timely basis. Going forward, these templates will be disclosed as additional information in the 31 December report, in which period operational risk capital is updated under the SMA.

Glossary

Accountable Person

An accountable person for the purposes of the Banking Act 1959 (Cth).

Additional Tier 1 capital

Comprises high quality components of capital that provide a permanent and unrestricted commitment of funds, are freely available to absorb losses, rank behind the claims of depositors and other more senior creditors in the event of winding up of the issuer, and provide for fully discretionary capital distributions.

ADI

Authorised deposit-taking institution

Advanced internal ratings-based (A-IRB) approach

The approach used by the Group, under approval from APRA, to calculate the capital requirement for credit risk, which utilises the outputs of internally developed models for probability of default, loss given default and exposure at default.

ANZSIC

Australian and New Zealand Standard Industrial Classification

APRA

Australian Prudential Regulation Authority

APS

Prudential Standards issued by APRA applicable to ADIs.

Available stable funding (ASF)

The portion of an ADI's capital and liabilities expected to be reliably provided over a one-year time horizon.

Banking book

Exposures not contained in the trading book.

BCBS

Basel Committee on Banking Supervision

BNZ

Bank of New Zealand, a banking subsidiary regulated by the Reserve Bank of New Zealand.

Carrying value

The value of assets and liabilities reported on the balance sheet under accounting standards and interpretations issued by the Australian Accounting Standards Board. Accounting policy information on how the requirements of the Australian Accounting Standards Board have been applied is contained in the 2024 Annual Report.

CCF

Credit conversion factor

CCR

Counterparty credit risk

CCyB

Countercyclical capital buffer

Central counterparty (CCP)

A clearing house which interposes itself, directly or indirectly, between counterparties to contracts traded in one or more financial markets, thereby insuring the future performance of open contracts.

Citi consumer business

Citigroup's Australian consumer business, acquired by the Group in June 2022.

Citigroup

Citigroup Pty Limited and Citigroup Overseas Investment Corporation.

Common Equity Tier 1 (CET1) capital

The highest quality component of capital. CET1 capital is subordinated to all other elements of funding, absorbs losses as and when they occur, has full flexibility of dividend payments and has no maturity date. CET1 capital consists of paid-up ordinary share capital, retained profits and certain other items as defined in APS 111 'Capital Adequacy: Measurement of Capital'.

Common Equity Tier 1 capital ratio

Common Equity Tier 1 capital divided by risk-weighted assets.

Company

National Australia Bank Limited ABN 12 004 044 937

CPS

Prudential Standards issued by APRA applicable to regulated entities, including ADIs.

Credit valuation adjustment

A capital charge to reflect potential mark-to-market losses due to counterparty migration risk for bilateral over-the-counter derivative contracts.

CRM

Credit risk mitigation

D-SIB

Domestic systemically important bank

Default

Default occurs when a loan obligation is contractually 90 days or more past due, or when it is considered unlikely that the credit obligation to the Group will be paid in full without remedial action, such as realisation of security.

Default fund

Clearing members' funded or unfunded contributions towards, or underwriting of, a central counterparty's mutualised loss sharing arrangements.

Expected loss

A calculation of the estimated loss that may be experienced over the next 12 months. Expected loss calculations are based on the probability of default, loss given default and exposure at default values of the portfolio at the time of the estimate which includes stressed loss given default for economic conditions.

Exposure at default (EaD)

An estimate of the credit exposure amount outstanding if a customer defaults.

Extended Licensed Entity

The ADI and any APRA approved subsidiaries assessed as effectively part of a single 'stand-alone' entity, as defined in APS 222 'Associations with Related Entities'.

Foundation internal ratings-based (F-IRB) approach

An approach to calculate the capital requirement for credit risk, which utilises the outputs of internally developed models for probability of default, and supervisory estimates for loss given default and exposure at default.

G-SIB

Global systemically important bank

Group

NAB and its controlled entities.

High-quality liquid assets (HQLA)

Consists primarily of cash, deposits with central banks, Australian government and semi-government securities and securities issued by foreign sovereigns as defined in APS 210 'Liquidity'.

Individually assessed provision for credit impairment

The provision assessed on an individual basis in accordance with Australian Accounting Standard AASB 9 'Financial Instruments'.

Internal model approach (IMA) - non-traded market risk

The approach used by the Group, under approval from APRA, to calculate the capital requirement for non-traded market risk. The IMA is used to calculate interest rate risk in the banking book for transactions in the banking book.

Internal model approach (IMA) - traded market risk

The approach used by the Group, under approval from APRA, to calculate the capital requirement for traded market risk. The IMA is used to calculate general market risk for transactions in the trading book, other than those covered by the standard method.

Leverage ratio

Tier 1 capital divided by exposures as defined by APS 110 'Capital Adequacy'. Exposures include on-balance sheet exposures, derivative exposures, securities financing transaction exposures and other off-balance sheet exposures.

Liquidity coverage ratio (LCR)

A metric that measures the adequacy of high-quality liquid assets available to meet net cash outflows over a 30-day period during a severe liquidity stress scenario.

Loss given default (LGD)

An estimate of the expected severity of loss for a credit exposure following a default event. Regulatory LGDs reflect a stressed economic condition at the time of default.

NAB

National Australia Bank Limited ABN 12 004 044 937

Net stable funding ratio (NSFR)

A ratio of the amount of available stable funding to the amount of required stable funding.

Non-performing exposures

Exposures which are in default aligned to the definition in APS 220 'Credit Risk Management'.

Probability of default (PD)

An estimate of the likelihood of a customer defaulting or not repaying their borrowings and other obligations in the next 12 months.

Qualifying central counterparty (QCCP)

An entity licensed to operate as a central counterparty, and permitted by its regulator or overseer to operate as such with respect to products offered. The entity must be based and prudentially supervised in a jurisdiction where the relevant regulator or overseer has established, and publicly indicated that it applies domestic rules and regulations consistent with the 'Principles for Financial Market Infrastructures' issued by the Committee on Payments and Market Infrastructures and International Organization of Securities Commissions.

RBA

Reserve Bank of Australia

RBNZ

Reserve Bank of New Zealand

Required stable funding (RSF)

The amount of stable funding an ADI is required to hold measured as a function of the liquidity characteristics and residual maturities of the various assets held by an ADI, including off-balance sheet exposures.

Risk-weighted assets (RWA)

A quantitative measure of risk required by the APRA risk-based capital adequacy framework, covering credit risk for on- and off-balance sheet exposures, market risk, operational risk and interest rate risk in the banking book.

SA-CCR

Standardised approach for measuring counterparty credit risk exposures

Securities financing transaction (SFT)

A transaction such as a repurchase agreement, reverse repurchase agreement or a securities lending and borrowing transaction where the value of the transaction depends on the market valuation of securities and the transaction is typically subject to margin agreements.

SME

Small and medium-sized enterprises

Standard method

An alternative approach used to calculate the capital requirement for traded market risk, which applies supervisory risk-weights to positions arising from trading activities.

Standardised approach (SA)

An alternative approach used to calculate the capital requirement for credit risk, which utilises regulatory prescribed risk-weights based on external ratings and/or the application of specific regulator defined metrics to determine risk-weighted assets.

Standardised measurement approach (SMA)

An approach used to calculate the capital requirement for operational risk based on a business indicator, a financial statement proxy of operational risk exposure.

Tier 1 capital

Common Equity Tier 1 capital plus Additional Tier 1 capital.

Tier 1 capital ratio

Tier 1 capital divided by risk-weighted assets.

Tier 2 capital

Includes other components of capital that, to varying degrees, fall short of the quality of Tier 1 capital but nonetheless contribute to the overall strength of an ADI and its capacity to absorb losses.

Total capital

Tier 1 capital plus Tier 2 capital.

Total capital ratio

Total capital divided by risk-weighted assets.

Trading book

Positions in financial instruments, including derivatives and other off-balance sheet instruments, that are held either with a trading intent or to hedge other elements of the trading book.

Value at risk (VaR)

A mathematical technique that uses statistical analysis of historical data to estimate the likelihood that a given portfolio's losses will exceed a certain amount.

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