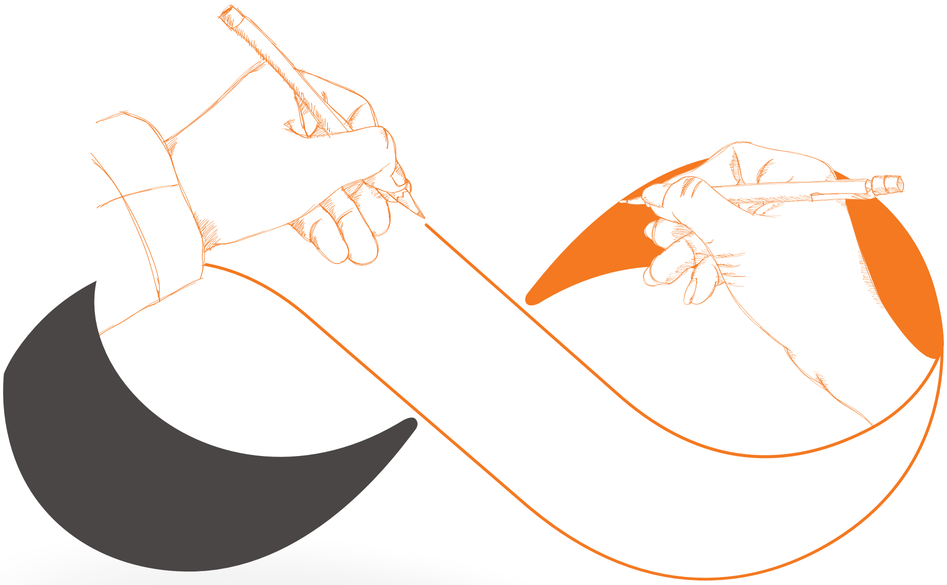
RISK MANAGEMENT REPORT 2024

מזרחי טפחות
MIZRAHI TEFAHOT



People first and foremost

This report includes supplementary information to the Bank's financial statements and is prepared in accordance with the Supervisor of Banks' directives, which include disclosure requirements from Basel Pillar III and additional disclosure requirements by the Financial Stability Board (FSB). The report is available on the Israel Securities Authority's MAGNA website - www.magna.isa.gov.il and on the Bank website at www.mizrahi-tefahot.co.il/en financial reports.

Bank Mizrahi Tefahot

2024 Risks Management Report

This translation of the Risks Report is for convenience purposes only. The only binding version of the Risks Report is the Hebrew version.

This report includes additional information to the Bank's financial statements and is compiled in conformity with directives of the Supervisor of Banks, which include disclosure requirements of Basel Pillar 3 and additional disclosure requirements of the Financial Stability Board (FSB).

The following reports are available on ISA's MAGNA website: This risks report and other supervisory information about supervisory capital instruments issued by the Bank. below. "the reports").

In conformity with directives of the Supervisor of Banks, the condensed financial statements for the interim period and the aforementioned reports are also available on the Bank website:

www.mizrahi-tefahot.co.il >> about the bank >> investor relations >> financial statements.

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List of tables included in the risks report

Risks Report

This risks report includes additional information to the consolidated financial statements of Bank Mizrahi Tefahot Ltd. and its subsidiaries as of December 31, 2024. The condensed financial statements and additional information to the condensed financial statements, including the Report of the Board of Directors and Management, this Risks Report and other supervisory disclosures have been approved for publication by the Bank's Board of Directors at its meeting held on February 26, 2025.

The risks report and other supervisory disclosures are presented in conformity with directives and guidelines of the Supervisor of Banks, including disclosure requirements from Basel Pillar 3, disclosure requirements issued by the Financial Stability Forum (FSF) and further disclosure requirements of the Financial Stability Board (FSB).

The disclosure in this report is designated to allow readers to evaluate significant information included with regard to implementation of the framework for capital measurement and capital adequacy and to implementation of provisions of "Basel III: Global supervisory framework to improve stability of the banking system".

All of these reports are also available on the Bank website at:

www.mizrahi-tefahot.co.il About the Bank >> Investor Relations >> Financial Information

In conformity with the Equal Rights for Persons with Disabilities Regulations (Service accessibility adaptations), 2013, the website also provides accessible reports.

Avraham Zeldman	**Moshe Lari**	**Ofer Horvitz**
Chairman of the Board of Directors	President & CEO	Vice-president Chief Risks Officer (CRO)

Approval date of the financial statements and risks report:
Ramat Gan, February 26, 2025

Forward-looking information

Some of the information in the Risks Report, which does not relate to historical facts, constitutes “forward-looking information”, as defined in the Securities Law, 1968 (hereinafter: "the Law").

Actual Bank results may materially differ from those included in the forward-looking information, due to many factors including, inter alia, changes to capital markets in Israel and overseas, macro-economic changes, geo-political changes, changes to legislation and regulation and other changes not within the Bank's control, which may result in assessments not materializing and/or in changes to business plans.

Forward-looking information typically includes words or expressions such as: "we assume", "expected", "forecasted", "estimate", "intend", "plan", "may change" and similar expressions, as well as nouns such as: "plan", "objectives", "desire", "should", "may", "will be". Such forward-looking expressions involve risk and uncertainty, as they are based on current Bank assessments with regard to future events, which include the following: Forecasts of economic developments in Israel and worldwide, especially the state of the economy, including the effect of macroeconomic and geopolitical conditions; expectation of changes and developments in the currency markets and the capital markets, forecasts related to other factors affecting the exposure to financial risks, forecasts of changes in the financial stability of borrowers, the public’s preferences, changes to legislation and supervisory regulations, the behavior of competitors, the Bank’s image, technological developments and human resources developments.

The information presented below relies, inter alia, on publications from the Central Bureau of Statistics, Ministry of Finance, Bank of Israel and others who publish data and estimates with regard to capital markets in Israel and overseas, and on forecasts and future estimates on various matters, as noted above, and any anticipated events or developments may fail to materialize, in whole or in part.

Application scope

Mizrahi Tefahot Group is supervised on a consolidated basis by the Supervisor of Banks at the Bank of Israel. Consolidation of the consolidated entities and recording of the carrying amount of associates are in conformity with generally accepted accounting principles and in conformity with directives of the Bank of Israel. As of December 31, 2024, there were no differences between the consolidation basis based on accounting principles and the supervisory consolidation basis for capital adequacy purposes. As required by directives of the Bank of Israel, the data presented in conjunction with supervisory disclosure requirements in conformity with provisions of the Basel Committee included in this report, are only presented on a consolidated basis and are based on the financial information presented on the financial statements, with adjustments mandated by application of the Basel Committee directives (such as: deductions from capital, debt instruments qualified for inclusion in regulatory capital, special treatment of accounting effect with respect to streamlining plan on Bank capital).

For more information about investees, see chapter "Major investees" on the Report by the Board of Directors and Management and in Notes to the financial statements as of December 31, 2024.

Key supervisory ratios and overview of risk management and weighted risk assets

Key supervisory ratios – key data

Below is key data relevant for the Bank risk profile:

	2024				2023			
	Fourth quarter	Third quarter	Second quarter	First quarter	Fourth quarter	Third quarter	Second quarter	First quarter
Key supervisory and financial ratios								
Available capital								
Tier I equity[1]	31,963	31,128	30,252	29,422	28,434	27,504	26,908	26,001
Tier I capital before effect of transitional provisions	31,874	31,039	30,163	29,333	28,257	27,324	26,724	25,813
Total capital	41,060	40,549	39,541	37,851	36,800	35,395	35,390	34,263
Total capital before effect of transitional provisions	41,040	40,529	39,521	37,831	36,761	35,353	35,345	34,213
Risk weighted assets								
Total risk weighted assets (RWA)	307,364	298,536	289,808	277,611	275,440	271,767	262,909	256,874
Capital adequacy ratio (in %)								
Tier I capital ratio[1]	10.40	10.43	10.44	10.60	10.32	10.12	10.23	10.12
Tier I capital ratio before effect of transitional provisions	10.37	10.39	10.40	10.56	10.25	10.05	10.16	10.03
Total capital ratio	13.36	13.58	13.64	13.63	13.36	13.02	13.46	13.34
Total capital ratio before effect of transitional provisions	13.35	13.57	13.63	13.62	13.34	13.00	13.43	13.29
Tier I capital ratio required by Supervisor of Banks	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60
Available Tier I capital ratio, beyond what is required by the Supervisor of Banks[2]	0.80	0.83	0.84	1.00	0.72	0.52	0.63	0.52
Leverage ratio								
Total exposure	529,598	517,795	505,336	491,302	487,483	476,015	469,461	469,925
Leverage ratio (in %) [3]	6.04	6.01	5.99	5.99	5.83	5.78	5.73	5.53
Leverage ratio before effect of transitional provisions (in %)	6.02	5.99	5.97	5.97	5.80	5.74	5.69	5.49
Liquidity coverage ratio[4]								
Total high quality liquid assets	90,905	87,202	88,501	85,893	82,465	80,986	80,940	83,031
Total outgoing cash flows, net	67,313	68,489	67,447	61,899	63,118	58,601	63,214	65,864
Liquidity coverage ratio (in %)	135	127	131	139	131	138	128	126
Net stable funding ratio								
Total available stable funding	306,692	301,090	291,303	284,082	281,426	276,450	282,362	275,561
Total required stable funding	272,502	266,114	256,681	249,506	246,931	244,595	246,136	243,380
Net stable funding ratio (in %)	113	113	113	114	114	113.0	114.7	113.0
Performance benchmarks								
Net profit return on equity[6][7]	16.9	19.0	19.9	18.1	15.5	16.8	22.0	[8]22.4
Net profit return on risk assets[6][7]	1.71	1.93	2.03	1.84	1.53	1.64	2.15	2.15
Deposits from the public to loans to the public, net	109.9	110.6	110.6	110.6	110.2	108.5	108.9	111.6
Key credit quality benchmarks								
Ratio of balance of provision for credit losses to total loans to the public	1.14	1.17	1.20	1.22	1.24	1.19	1.01	0.98
Ratio of non-accruing debts or debts in arrears 90 days or longer to loans to the public	1.21	1.24	1.14	1.11	1.16	0.99	0.90	0.88
Expenses with respect to credit losses to loans to the public, net for the period[7]	0.12	0.15	0.13	0.21	0.36	0.86	0.31	0.29
Of which: With respect to group provision	(0.04)	0.04	(0.03)	0.10	0.14	0.76	0.22	0.18
Of which: With respect to commercial loans other than residential mortgages	0.34	0.28	0.31	0.50	0.94	1.74	0.78	0.65
Of which: with respect to residential mortgages	(0.02)	0.07	0.02	0.04	0.02	0.34	0.04	0.08
Ratio of net accounting write-offs to average loans to the public[7]	0.17	0.10	0.08	0.16	0.13	0.04	0.12	0.07

Below is key data relevant for the Bank risk profile – Continued:

	For the year ended December 31	
	2024	**2023**
Performance benchmarks		
Net profit return on equity(6)	18.5	19.1
Net profit return on risk assets(6)	1.71	1.86
Key credit quality benchmarks		
Expenses with respect to credit losses to loans to the public, net for the period	0.14	0.45
Of which: With respect to group provision	0.02	0.31
Of which: With respect to commercial loans other than residential mortgages	0.34	1.01
Of which: with respect to residential mortgages	0.03	0.12
Ratio of net accounting write-offs to average loans to the public	0.13	0.09

Financial ratios indicate as follows:

- Net profit return on equity was 18.5% in the reporting year.
- The ratio of Tier I capital to risk components increased to 10.40%. The minimum ratio required of the Bank is 9.60%.
- The Bank's financial ratios: The Bank's capital ratios, leverage ratio and liquidity ratios are high - above the required regulatory ratios.
- The cost-income ratio in 2024 reached 35.5%.

(1) The Bank has no capital instruments included in "Additional Tier I capital", so that total Tier I capital equals total Tier I equity.
(2) Including a capital requirement at 1% of the residential mortgage balance as of the date of the financial statements.
(3) Leverage Ratio – ratio of Tier I capital (according to Basel rules) to total exposure. This ratio is calculated in conformity with Proper Conduct of Banking Business Directive 218.
(4) Liquidity Coverage Ratio – ratio of total High-Quality Liquid Assets to net cash outflow. This ratio is calculated in conformity with Proper Conduct of Banking Business Directive 221, in terms of simple averages of daily observations during the most recent reported quarter.
(5) Net stable funding ratio – a liquidity ratio stipulated by the Supervisor of Banks, in conformity with recommendations of the Basel Committee, designed to maintain a sustainable financing structure over time, in addition to the liquidity coverage ratio.
(6) Net profit attributable to shareholders of the Bank.
(7) Annualized.

Bank approach to risk management

Efficient, comprehensive risk management is a major pillar for ensuring bank stability over time. The Bank's risk management strategy is designed to identify, manage, monitor, quantify, avoid or mitigate all material risks associated with Bank operations and to support achievement of its business objectives. The Bank's business activity is exposed to various material financial and non-financial risks, whose materialization has potential to impact the Bank's financial results or image. The Bank has classified the following risks as material risks: Credit and centralization risk, financial risks that include the liquidity risk and the market and interest risks, compliance and regulatory risk, operational risks including IT risk, information and cyber security risk, legal risk, human capital risk, model risk and other risks directly managed as part of business management at the Bank, such as: Reputational risk, climate and environmental risks, strategic business risk and regulatory business risk.
This chapter describes the responsibility of management and of the Board of Directors in risk assessment and management processes, designed to disclose to stakeholders relevant, material information for understanding all significant risks to which the Bank is exposed, the Bank's risk tolerance and risk appetite with respect to its major operations, the Bank's risk profile and material developments in the reported period which have material potential to impact risks and risk management at the Bank.

General information regarding management of various risks and the risk profile

The Bank has in place an extensive framework for management and control of the risks to which the Bank is exposed, including an organizational structure supporting management and control of such risks. The Bank operates in conformity with regulatory requirements with regard to risk management and control, and in conformity with the Supervisor of Banks' Proper Conduct of Banking Business Directives, and in particular with Proper bank Management Directive 310 "Risks Management", which is based on the Basel Committee recommendations, which specifies the principles for risks management and control in the Israeli banking system and stipulates the standards required of the banks for creating their risks management and control framework in line with regulatory requirements, the Bank's risk appetite, risk strategy and its business targets. These principles include, inter alia: proper involvement of management and of the Board of Directors in risk management, tools for risk identification and measurement, control and monitoring processes and the measures for risk mitigation. The Bank's policy documents for risk control and management are based on these principles.

Risk management at the Bank Group is conducted based on an overview of Bank activity in Israel and at overseas affiliates, in conformity with regulatory requirements and in order to support achievement of the Group's strategic targets, while taking risk judiciously and maintaining a risk level in line with the overall risk appetite specified by the Bank Board of Directors.

Risk appetite defines the overall risk level which the Bank is willing to assume and constitutes a oversight ruling. Risk appetite specifies where the Bank wishes to be in terms of return (proceeds/reward) vs. risk (cost) from a forward-looking viewpoint. Risk appetite is defined in qualitative and quantitative terms in the normal course of business and under stress scenarios, and is based on the risk strategy and on basic principles of the Bank Group's business and strategic plan, on the required liquidity and capital for achieving the strategic objectives.

Risk tolerance is a specific setting of risk limitations for all risks to which the Bank is exposed. Risk values are assessed by a range of qualitative and quantitative benchmarks, in support of achieving the business goals, while keeping the Bank within the overall limits of the specified risk appetite and subject to strict regulatory restrictions. These risk restrictions, on aggregate, reflect the Bank's risk appetite and the overall risk level which the Bank is willing to assume.

Effects of the war

The outbreak of the Iron Swords War on October 7, 2023 caused disruptions in economic activity in Israel, including in terms of absence of employees who were drafted as reservists, and due to the shortage of foreign and Palestinian workers, especially in the construction industry; the war also had an adverse effect on private consumption and on current business activity, due to the deterioration of the security situation. In view of the geopolitical instability, the Israeli economy is experiencing economic uncertainty, which subsided in the wake of the ceasefires in the north and the south. Note that even prior to this war, there was economic uncertainty due to the Government's plans to promote changes to the judicial system and the public disagreement with regard to this move. Since the outbreak of the war, there has been a significant increase in government spending - both in terms of defense costs, and in terms of compensation to civilians in respect of the damages of the war and looking after evacuees - all of which led to a sharp increase in the deficit rate. This occurred alongside a slowdown in the growth rate of the Israeli economy due to the war's adverse effect on normal civilian day-to-day life.
In view of the increase in the systemic risk due to the war, the Bank increased its overall risk assessment as from the third quarter of 2023. In the opinion of the Bank, this risk level is in line with the current risk level of the Israeli economy against the backdrop of the uncertainty and its potential effect on the material risks, including credit risks, financial risks, business continuity risk, and information security and cyber risks.

The Bank of Israel issued a range of relief measures and war-time adjustments in Proper Conduct of Banking Business Directive 251 (Interim Directive) for addressing the impact of this war. Furthermore, the Government has established funds to assist small businesses. The Bank applies the reliefs and directives as instructed by the Bank of Israel, and has even voluntarily expanded these reliefs and acts to support and to provide an appropriate business solution for its customers in its various areas of activity, and to support households and businesses as they go through this period. This is done concurrently with ongoing monitoring and review of implications of these activities for risk management.

It is noted that the Bank has not changed its risk assessments, despite the improvement in economic parameters and in the security situation following the ceasefire in the north and the suspension of fighting in the south, and despite the fact that no material changes were observed in the different risk metrics. This is due to the Bank's conservative risk management approach and the geopolitical uncertainty.

The State of Israel's Credit Rating by International Rating Companies

As a result of the war and the intensification of the geopolitical risks, during 2024 the international rating agencies downgraded the State of Israel's credit rating and updated the rating outlook. The banks' rating is influenced by the country's rating, and the Bank's credit rating and credit forecast was revised accordingly.

On October 1, 2024 the S&P rating agency announced that it was lowering the credit rating of the State of Isarel from A+ to A with a Negative Outlook. This is compared to a credit rating of AA- before the war. The credit rating was downgraded following the prolongation and expansion of the war and the escalation of the conflict with Iran. Consequently, the rating agency expects that economic growth in Israel will suffer and that the deficit rate will increase.

On September 27, 2024, rating agency Moody's announced it was lowering Israel's credit rating by two notches from A2 to Baa1 with a Negative Outlook. This is compared to a credit rating of A1 before the war. In the report published by the agency it is noted that the drivers for downgrading Israel's credit rating include, among other things: Intensification of the geopolitical risks, the absence of a budget for 2025 and ongoing social-political tensions. The agency expects that the damage to the economy will be prolonged and that long-term GDP growth rate will be adversely affected.

On August 12, 2024, rating agency S&P announced that it is lowering Israel's credit rating from A+ (pre-war level) to A, with a Negative Outlook. The agency listed in its decision as reasons for the credit downgrading the prolongation of the war, the increase in geopolitical uncertainty and the increase in the deficit rate.

During January 2025 and following the ceasefire agreements in the north and in Gaza, the international rating agencies published revised reviews regarding the Israeli economy. According to the reviews, the mitigation of the security risks increases Israel's economic potential; however, at this stage no changes were made to the credit rating and the outlook, mainly due to the potential future effects of the war and the need to wait for a stabilization of the security situation.

Corporate governance of risks management at the Bank

Corporate governance at the Bank is supportive of maintaining a risk management culture, and is based on three lines of defense: First line of defense – the business lines; Second line of defense – the Risks Management Division headed by the Bank Chief Risks Officer (CRO), which is the primary control function, along with control functions from other divisions; and the third line of defense – the Internal Audit Division.

The Board of Directors and management constitute additional lines of defense, acting to supervise operation of the three lines of defense.

These lines of defense are intended to ensure that the Bank has deployed an appropriate framework for risks management and control. Below is specification of the business functions in the three lines of defense:

Lines of Defense

Line	Function	Reporting to	Role
First line of defense	Corporate divisions at the Bank	Corporate Division managers, reporting directly to the President & CEO	Corporate division managers, who are risk managers, risk takers, have full responsibility for risk management and for implementing an appropriate control environment for their operations, while striving to achieve their strategic targets and objectives, in conformity with the specified risk appetite and with regulatory directives.
Second line of defense	Risks Management Division, which is the primary control function, and other units from other divisions.	Manager, Risks Management Division – reporting to the Bank President & CEO.	The Risks Management Division, headed by the CRO, is independent of the business units, acts in concert with control functions of other divisions, including the Financial Information and Reporting Division and the Legal Division, in order to complete the risk management activities of the first line of defense, and to assist management in promoting an integrated, cross-corporate vision of risks (Enterprise Risk Management – ERM), plan and develop the risks management framework, formulating the risks assessment methodology, ensuring alignment of Bank operations with the risk appetite set by the Board of Directors, challenge and ensure completeness and effectiveness of the risks management framework and internal controls.
Third line of defense	Internal Audit Division	Chairman of the Bank's Board of Directors	The Internal Audit Division acts objectively and independently, reviews the effectiveness and efficiency (mostly in retrospect) of work processes and risk management in conformity with a risk-based multi-annual program, identify weaknesses in internal controls which may impact the effectiveness of control and monitoring remedial action taken for such identified weaknesses.

In addition to these 3 lines of defense, the Bank has another line of defense - its independent auditor, which is charged with verifying that effective controls are in place over internal processes that affect financial reporting; this line of defense comprises a list of tests to substantiate the balances, the amounts and the manner of presentation in the financial statements. The independent auditor reports directly to the Audit Committee.

Different interfaces have been specified between the lines of defense, including regular monitoring processes, committees, forums and reporting channels deployed under normal and emergency conditions, in order to maintain a high-quality risks management culture and good communications between the three lines of defense, as a basis for proper risk management governance. Communication of risk-related information is designed to ensure optimal addressing by the Bank of the material risks for its operations, or the potential for development of such risks, while achieving its business targets.

The functions involved in risks management and control at the Bank are as follows:

The Bank's Board of Directors is responsible for setting the overall risk management strategy and for supervising the risk management framework at the Group, for determination of the Bank's risk appetite, approval of the risk management and control framework consistent with the risk appetite framework and setting principles in specific policy documents for risk management for each risk, to guide the Bank in its day-to-day operations. The Board of Directors is responsible for guiding, supervising and controlling management actions and for ensuring that management takes the required actions to identify, manage, measure and mitigate risk, ensures that clear areas of responsibility and reporting paths are in place at the Bank, instills an organizational culture supportive of risk management which includes implementation of high standards of professional behavior, integrity and fairness, ensuring that the Bank is operating in compliance with the Law and regulation. The Board of Directors operates through multiple professional committees, tasked with conducting comprehensive and in-depth discussion of the various matters before they are brought for discussion and approval by the Board plenum.

Risks Management Committee – A committee which advises the Board of Directors, discusses matters concerning risk management and control at the Bank and risk strategy, including current and future risk appetite, capital planning and management. The Committee also supervises how executive management implements the risk strategy.

The Committee is responsible for approval of the Bank's risks mapping and the dedicated policy documents for each of the Bank's risks. These documents specify the corporate governance, the nature of the risk and the risk appetite adjusted for strategic operations, as well as the risk management and measurement processes and methods applied by the Bank to mitigate it, including effective monitoring and control processes.

The Committee conducts a quarterly discussion of the Bank's risks document, which presents an overview of the current and future risk profile and concise, clear reporting of all material and evolving risks and their evolution over time, with emphasis on events in the reported quarter, on the quarterly and annual risks document and on the annual ICAAP (Internal Capital Adequacy Assessment Process) document and results of the Bank of Israel Uniform Stress Scenario and its impact on Bank data, profitability and stability of Bank capital.

The Committee regularly receives extended reviews on various topics, as well as ad-hoc matters in line with evolution of various risks at the Bank. The Committee also discusses new products subject to approval by the Board of Directors, new and revised regulatory directives and guidance with regard to risk management at the Bank, significant debriefs which took place with regard to risk management and any other topic of relevance to risk management at the Bank.

IT and Technology Innovation Committee – The Committee discusses and advises the Board of Directors on matters of technology risk strategy, risk appetite, technology risks map, IT policy and management with regard to technology innovation, including information and cyber security policy and strategy, technology infrastructure at the Bank Group, administration and use of data bases, technology innovation in support of business innovation, and aligning these with the overall strategy and policy of the Bank Group, including targets, annual work plans and resources, with regard to IT and technology innovation.

Audit Committee – The Committee acts to ensure that the Bank maintains the internal control framework, so as to ensure proper conduct of Bank operations. The Audit Committee is tasked with supervising the work of the Bank's Internal Auditor and that of the Bank's Independent Auditor. Thus, the Committee discusses the Bank's financial statements and risks report and makes its recommendation to the Board of Directors with regard to its approval. The Audit Committee discusses work plans of internal audit and of the Independent Auditor, as well as audit reports of the Internal Auditor, the Independent Auditor as well as those of the Supervisor of Banks or any other competent authority. One of the roles of the Audit Committee is to point out faults in business management at the Bank, including those arising from organizational shortcomings, in consultation with the Internal Auditor or with the Independent Auditor and proposes to the Board of Directors ways to amend them.

Credit Committee - The Committee is tasked with approval of credit applications which exceed the limits specified in the credit policy and reporting of utilization of its authority to exceed guidelines set forth in the credit policy. The Committee also discusses credit control reports and current credit reports, as well as general credit-related topics.

Remuneration Committee – The Committee discusses and makes recommendations to the Board of Directors on remuneration policy for officers and employees. The committee also approves the terms of office and employment of officers (prior to approval by the Board of Directors).

President & CEO – responsible for on-going management of Bank operations, subject to policies set by the Board of Directors and subject to guidance from it, in particular with regard to implementing the Bank's strategy and business plans. In this regard, the President & CEO is responsible for management of all risks at the Bank, for leadership of management and risks managers in comprehensive and integrative management of risks and implementation of an effective internal controls system.

The Bank President & CEO receives regular, current reviews and reports at least about the Bank's risk profile in such layout and timing as stipulated by resolutions of the Bank's Board of Directors and in conformity with Proper Conduct of Banking Business Directives. The Bank President & CEO is responsible for reporting to the Board of Directors, in conformity with the outline specified in Bank procedures, including reporting concerning risk management by the Bank and, in particular, any unusual events and/or deviations from the risk appetite.

Bank management – tasked with ensuring that Bank operations are in conformity with the business strategy and targets specified and approved by the Board of Directors and within the risk appetite specified by the Board of Directors. Management is responsible for regularly managing the material risks facing the Bank. Each Risks Officer, in his own area, is responsible for implementation of the principles specified by the Bank Board of Directors for addressing the risks they manage. Management is responsible for formulating risks management policy, setting limits and guidelines, deployment and implementation of risks management and control processes, reporting on the risk profile in the normal course of business and under stress scenarios, and approval of new products and activities prior to the launch thereof.

The Bank's organizational structure is supportive of achieving the Bank's business targets while enabling appropriate risk management and control processes.

The Bank operates risk management committees at all management levels. These committees act as professional management forums, designed to foster discussion of issues related to risks management and control and to promote the necessary moves for on-going upgrade of the Bank's risks management framework.

Chief management committees include: The Management Forum, Senior Credit Committee, the Asset and Liability Management Committee, the Overseas Affiliates Committee, the Management Committee for Operational Risk Management, the Management Committee for Risk Management, which discusses inter alia the quarterly Risks Document, steering committees on key technology and other matters having significant effect on the Bank. The CRO and other representatives from the Risks Management Division are members of these committees, operating in normal times and during emergency, in conformity with detailed procedures.

The CRO – The Manager, Risks Management Division serves as the Bank's Chief Risks Officer (CRO) and is responsible for the risk management and control function and for the Bank's risk management framework. The Risks Management Division is a key foundation of the Bank's second line of defense, acts independently of the risk-taking business units. The Division is involved in real time in all processes and lines of operation at the Bank, in order to maximize the business value for the Bank, while maintaining strict, high-quality risk management. The Division's roles and responsibilities are in conformity with principles set forth in Proper Conduct of Banking Business regulation 310 "Risk Management". The CRO has direct access to the Bank President & CEO and to the Bank Board of Directors, and maintains structured, regular reporting processes with these entities. The CRO is responsible for maintaining appropriate risks management and control at the Bank, for maintaining a Bank-wide reporting platform, with active involvement in the capital planning process and responsibility to ensure that all processes are taken to ensure that the Bank's risk profile is compliant with the risk appetite, as specified by the Board of Directors.

The CRO is responsible for ensuring that effective processes are in place for identification, measurement, monitoring and control, mitigation and regular reporting of all risks inherent across all business operations at the Bank, and that the Bank risk profile is in line with the risk appetite.

The CRO is responsible for specifying the Bank's risk appetite framework, including leading the creation of all policy documents on risk management and control, challenging material processes and risks at the Bank, including capital planning, principles of the renumeration policy, work plans, and the strategic plan, strategic and technology projects and other significant enterprise-wide processes at the Bank. The CRO is also responsible for ensuring that lesson learning and analysis processes take place following material failure events, and for implementation of the ICAAP procedure (annual internal procedure for assessing capital adequacy).

The CRO is directly responsible for multiple risks associated with internal control risks at the Bank. They are also responsible for control over credit risks and credit analysis, as an independent party to credit approval.

Chief Compliance Officer – heads the Compliance Department (reporting to the Manager, Risks Management Division) whose role is to assist Bank management and the Board of Directors in effective management of compliance risk.

The Compliance Officer acts in conformity with a letter of appointment approved by the Board of Directors, to deploy a compliance culture at the Bank, its subsidiaries and overseas affiliates by implementing a Group policy, to deploy a compliance culture across the organization and to supervise implementation of appropriate compliance processes at subsidiaries and affiliates.

The Compliance Officer handles issues of Bank compliance with obligations arising from securities law, economic competition law and privacy protection in general, and in accordance with the enforcement program in particular.

The Compliance Officer is a member of different forums at the Bank, in order to ensure an enterprise-wide view of various compliance aspects, designed to ensure compliance with all statutory provisions. The Compliance Officer also manages the control department, designed to verify compliance of the Bank with statutory and regulatory provisions, as well as the effectiveness of controls applied by the various business and headquarters departments.

Internal Audit Division – this is the third line of defense within corporate governance for risks management, reporting directly to the Bank Board of Directors and acting to test the effectiveness of the internal control framework at the Bank. This is typically done in retrospect, using various tools in accordance with a multi-annual risk-focused work plan based, inter alia, on the outcome of the ICAAP process, Internal Audit reports, audit reports by external parties, as well as inquiries and reviews by various entities at the Bank, including risk surveys. The Audit findings and recommendations are sent to the Chairman of the Board of Directors, Chairman of the Audit Committee, Bank President & CEO, the CRO, the Chief Accountant, the Compliance Officer and to relevant recipients at the Bank and implementation of these recommendations is monitored.

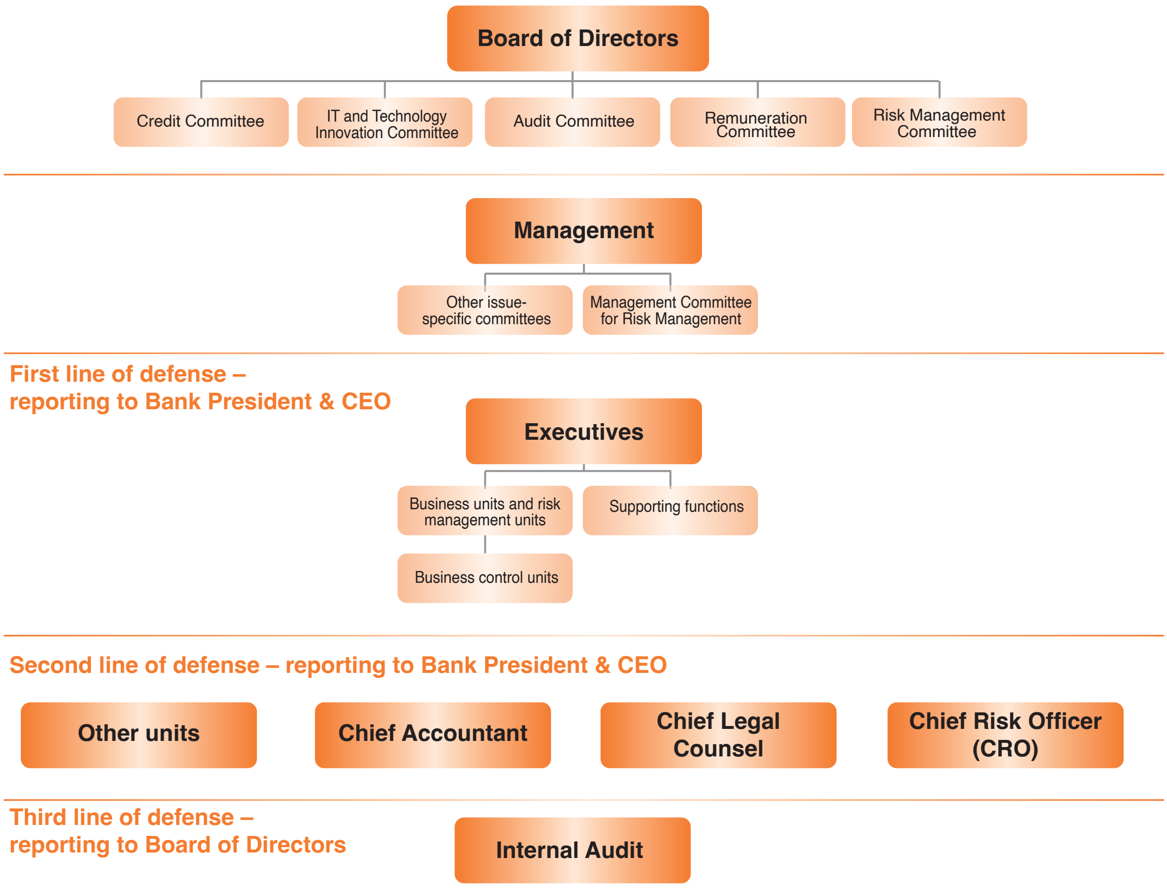
For more information about operations of the Internal Audit Division, see chapter "Corporate governance" in the financial statements.

Other forums for risks management and control operating at the Bank

As part of corporate governance for risks management and in line with the Bank's overall framework policy on risk management and control, the Bank has other forums for risks and capital management and control, including:

- Internal control forum – maintaining integration of between the gatekeepers at the Bank responsible for implementing its internal control framework.
- Capital planning and management forum – monitors the development of Bank capital in view of Bank targets.
- Risks Monitoring Forum (RMF) – diverse forums by specific risk, led by the Chief Risks Officer together with business unit managers, who engage in approval of methodology for risk management, stress scenarios and the outcome thereof, review of generally accepted practice and regulation, model validation and recommendations on implementation, approval of policy documents and procedures and operational risk aspects, including the risk map, risk assessment surveys, material events and lesson learning processes, as well as various other issues arising from risks management and internal controls of each business unit.
- Dedicated compliance-related forums, including cross-border risks management and addressing privacy protection.
- Operational risks steering committee – advisory committee to the CRO on operational risks.
- Cyber and information security steering committee – advisory committee to the CRO on cyber and information security risks.
- Models Forum – for integrated management of all aspects of model risk management.
- Fraud forum - dealing with overall management of the Bank's fraud risk, identification of significant emerging risk concentrations and formulation of processes for assessment, monitoring and resolution.
- Embezzlement forum - dealing with overall management of the Bank's embezzlement risk, including adequate processes for identifying and addressing embezzlement. Credit stress scenarios forum - discusses methodologies and results of credit stress scenarios.
- Forums for monitoring compliance with regulations - the Bank has several dedicated forums for discussing emerging regulations and regulations with business and accounting consequences.
- Forums for reporting and monitoring operations of subsidiaries.

Organizational structure for risk management at the Bank:



Risk management culture at the Bank

Deployment of an organizational culture for risk management at the Bank, based on the overall risk management framework and on corporate governance supportive of efficient risk management, support risk awareness, identification and handling of evolving risk and informed risk taking so as to ensure that risks are identified and handled in a timely manner.

The Bank constantly acts to develop and reinforce its risks management processes, to create a risks management culture in line with Bank operations and in support of achieving the Bank's business targets. Risks management is an integral part of regular Bank operations and the Risks Management Division is involved in material processes at the Bank in all areas.

The risk management culture at the Bank is reflected, inter alia, in these processes:

Challenging of business and strategic processes – The Risks Management Division challenges the strategic plan, annual work plans and capital planning, as well as material, such as business and technology projects and processes. The Division also monitors heat maps to identify major risks associated with operations of the various divisions, monitor and mitigate such risks and their impact on realization of business plans.

Approval process for new product or activity at the Bank (including significant changes to existing product / activity, new operational processes or material updates to existing processes) – this process is designed to ensure that all new products are channeled for approval in the relevant approval tracks in line with the risk level up to the level of the Board of Directors, that the range of risks associated with operating the new product would be identified and managed, and that such risks are appropriate for the Bank's business operation and risk appetite.

Risk surveys – periodic processes whereby risk surveys are conducted in various areas: operational, technological, cyber and compliance. These surveys are supporting tools for dynamic, active management of the risks map.

Debriefs and ad-hoc tests – A continuous internal process maintained by the various lines of defense conducts debriefs and ad-hoc tests, following materialization of internal or external failure events, including events which occur in the local and global banking system.

Reporting system – Reporting and communicating risk-related information is a key pillar of the Bank's capacity to manage its risks. The Bank has a specified set of reports, in the general framework policy on risk management and control, specifying the required reports under normal conditions, in case of an exceptional event and under stress (emergency) conditions between all lines of defense at the Bank, as needed.

Quarterly risks document – a report used as a significant primary tool by management and by the Board of Directors to maintain effective monitoring of Bank operations and compatibility of the risk profile with the specified risk appetite and risks management framework. This document presents developments in the current and future risk profile vs. risk appetite, with reference to material and emerging risks in the banking world, risk meters showing the risk values compared to specified limits, reporting of exceptions and actions taken by management's to return to the outline, results of stress scenarios and forward-looking analysis to review Bank stability, material lessons learned with regard to various risks, monitoring of Bank activities to bolster the effectiveness of risk management and control, and material issues raised in the ICAAP process, and other quantitative / qualitative information with regard to anticipated developments at the Bank and/or in the banking system, including new regulations.

Emergency conduct – The Bank has policy documents and structured procedures to ensure business continuity in times of emergency, including systemic emergencies, such as: war, earthquake, epidemic, cyber event etc. and Bank-specific events, such as technological failure of Bank systems. The Bank also has a procedure for business activity in case of a financial stress event in the markets, and special emergency forums activated at the Bank by the Risks Managers in case of occurrence, or potential occurrence, of such events related to credit, market and liquidity risk.

Training – Maintaining a comprehensive training system, consisting of different means, including: remote eLearning kits, custom training with regard to risks management, regulation and internal controls, dedicated seminars etc. In addition, constant contact is maintained between Risks Managers at headquarters and field units, in particular with representatives of each Bank unit appointed to be responsible for various risk areas, to disseminate operating principles and to communicate information to the various units.

Information systems – risks management and monitoring using controlled, computer-based systems with minimal dependence on manual processes and with near-real time update frequency. The Bank has measurement systems used to estimate all material risks to which the Bank is exposed, as well as IT systems to support risks monitoring and reporting.

Controls – a set of effective controls, consisting of efficient and independent control processes.

Code of Ethics - The Bank has a Code of Ethics in place, which was approved by Bank management and Board of Directors. The top values in the Code of Ethics are: Reliability, loyalty to customers, human dignity, transparency, commitment to the Bank, fairness, excellence, professionalism and social / community responsibility. The Bank operates the Ethics Committee convenes monthly, consists of representatives from HQ units and branches, and acts to regularly deploy the Code of Ethics by publishing dilemmas to Bank staff, discussing dilemmas raised from the field and reviewing the deployment process of the Code of Ethics.

Risk management and control policy documents – In 2024, Bank management and the Bank's Board of Directors discussed and approved all of the Bank's risk management and control policy documents. Risk management and control policy documents – These specify, inter alia, the corporate governance for risk management, roles and responsibilities of management, the Board of Directors, the Chief Risks Officer, the Risks Management Division and the business units, as well as the risk appetite, reporting and controls for the various risks.

Risk management policy and procedures at the Bank, as listed in this chapter, apply to all risk types and to all Bank units. Later on in this report, we present further references, as the case may be, to various risk types.

Deployment, limitation and enforcement of risk culture

The Bank has various action options and means to reinforce, deploy and enforce the risk culture across the different lines of defense, including, inter alia:

- Maintain regular contact between business functions in the first line of defense and risk management functions in the second line of defense.
- Regular reporting procedures in case of materialization of unusual events, including approaching the limits and deviation from the risk appetite. These procedures are in addition to the policy documents and include, other than the reporting chain, the management process for handling such events.
- Regular, structured mapping of all Bank of Israel regulations on various topics: laws, regulation and directives of other regulators, the person in charge and the various lines of defense in charge of proper handling of all of the risks, including infrastructure to control compliance with these directives.
- Maintaining regular contact between risks management functions in the second line of defense, and the internal audit function, which is the third line of defense, in the Internal Control Forum and by specific discussions to identify and discuss lateral risk concentrations and material specific events. Internal Audit conducts, as part of the organized Audit work plan, specific audit of activity of the Risks Management Division, including over the ICAAP process, as part of the independent overview. These include a review of the effectiveness of control, deployment of the organizational culture across the lines of business, processes for handling events and so forth.
- Compliance Officer's Report – is discussed every quarter by management and by the Board of Directors' Audit Committee, every six months by the Risk Management Committee, and annually by the Board of Directors' plenum; the report highlights key activities in various compliance areas, including enforcement of securities laws and the Economic Competition Law. This report is from a Group-wide viewpoint and combines operations of the Bank, its subsidiaries and overseas affiliates.
- The Chief Risks Officer conducts an annual discussion, in person, with the Board of Directors' Audit Committee.
- The Compliance Officer conducts an annual discussion, in person, with the Board of Director's Audit Committee.
- The Chief Accountant conducts an annual discussion, in person, with the Board of Directors' Audit Committee.
- The Chief Legal Counsel conducts an annual discussion, in person, with the Board of Director's Audit Committee.
- The Auditor conducts an annual discussion, in person, with the Board of Director's Audit Committee.

Hedging and risk mitigation

The organizational culture for risks management and corporate governance at is a significant mean for risks mitigation at the Bank. Proper corporate governance supports the risks management culture, ensuring that efficient, comprehensive processes are in place for risks management and control at the Bank to ensure its stability over time. A high-quality risk management culture and regular communications processes between the three lines of defense are key features of appropriate risk management governance. All risks to which the Bank is exposed are regularly and effectively managed and monitored by the relevant units.

The Bank's business model is based on a structured business strategy that includes specification of principles for the Bank's overall risk appetite. The Bank is acting in conformity with the outline of the five-year strategic plan for 2021-2025. Bank management regular monitors the achievement of work plan targets. Bank results indicate that the Bank has surpassed the business objectives set in the strategic plan.

The Risk Management Division maintains regular processes to challenge the work plans and achievement of strategic plan targets. Rapid evolution of technological developments and customer behavior in recent years has been changing the landscape of the financial world in terms of increased competition. These changes impact the survivability and nature of banks in future. They also that the potential to impact the Bank's business model in the long term.

To this end, the Bank acts in systematic fashion to monitor activity in the banking system, mapping of technology gaps and regular review of alternatives to be recommended for Bank operations, in line with the Bank's strategic principles. This is based on a strategic perception of the customer experience, reinforcing the trust-based relationship with customers, while providing the best service experience, with a choice of relevant products and services available.

The Bank has the business, legal and operating infrastructure to manage these exposures and to take proactive action to mitigate and/or hedge risk, in order to limit its exposure. The Bank has flexibility in management of physical assets as well as financial assets and liabilities, and in making changes to risk assets and capital, in the course of normal operations, so as to achieve the strategic targets.

Scope and key features of risks measurement system

In general, the Bank manages and monitors risks using controlled, computer-based systems with minimal dependence on manual processes and with near-real time update frequency. The Bank has measurement systems used to estimate all material risks to which the Bank is exposed, as well as IT systems to support monitoring and reporting regarding each of the risks.

Reporting risk information to the Board of Directors and to management

- The risk management culture at the Bank includes the set of reports by various entities which comprise the risk management system, including: The Bank Board of Directors, Bank President & CEO and management, as well as the Bank's three lines of defense. Specific policy documents for each risk faced by the Bank, including reference to the set of reports based on these principles, and based on principles of the reporting system at the Bank, as follows: Advance specification of reporting to various levels. Maintain effective communications processes between different pillars, for effective information sharing by reporting, stipulated in conformity with the nature of the risk and the needs of the Board of Directors and management, so as to allow them to make informed decisions.
- Comprehensive, clear and accurate information reported at the frequency and in the layout specified.
- Individual reports on the individual risk level, and overview reports.
- Providing disclosure with regard to significant assumptions underlying the report, as well as any limits on risk estimates.
- Regular review of the volume and quality of information received by the Board of Directors, to ensure that risk-related information is conveyed in a concise, clear manner.
- Current reports – current reporting processes at a specified frequency, as specified in risk control and management policy documents and in operating procedures for the various risks. These reports include, inter alia, reports for the quarterly risks document for the Board of Directors, reports for Bank management, reports for the Board of Directors' Risk Management Committee and for the Board plenum, as well as reports for various forums involved in risk management and control.

  The Bank's quarterly risks document is the main reporting tool by Bank management with regard to the risk profile given the risk appetite. This document presents a qualitative and quantitative view over development of all performance and risk benchmarks.

  The ICAAP document, which is presented annually and submitted to the Bank of Israel, includes qualitative and quantitative comments with regard to all risk aspects at the Bank, and adequacy of capital assigned against such risks, as described later in this chapter.
- Exception reporting – material exceptional events, deviating from normal operations, which may impact Bank operations or reputation.
- Emergency reporting:
  - Business continuity – When the Bank is required to apply its Business Continuity Plan (BCP), the system is required to be used in line with the existing action plan at the Bank, including unique reporting chains, customized for the situation, as specified in the Bank's BCP policy.
  - Financial emergency – a condition requiring special measures due to unusual changes in financial activity and/or financial or other unusual event, which may impact the markets, increasing the potential exposure to loss by the Bank due to various risks, should they materialize.

Use of stress scenarios in risk management

Stress scenarios are risk management tools used to assess Bank exposure to risks, both currently and from a forward-looking viewpoint. Stress scenarios allow the Bank to understand the impact of various stress events on Bank stability and provide a supporting tool for making business decisions. Stress scenarios are an additional integral tool to approaches, benchmarks and models used in risk management.

Objectives of stress scenario analysis at the Bank:

- Review the financial stability and the potential damage that may arise from materialization of a stress event.
- Review Bank sensitivity to unusual events.
- Assess materiality of various risks.
- Challenge the risk appetite and the capital planning.
- Identify material risk concentrations and weaknesses in the portfolio.
- Assessing capital adequacy.

The Bank has a diverse range of methodologies for conducting stress scenarios, calculated to assess the potential impact of various risks to the Bank's business and financial targets: Overall systemic scenarios for the entire Bank Group and scenarios for individual risk / risk factor. The Bank adapts the range of scenarios based on financial, political and geo-political developments in the local and global business environment. Moreover, in accordance with guidance from the Supervisor of Banks, the Bank applies a uniform systemic stress scenario. Scenarios are calculated on daily / monthly / quarterly / annual basis, as the case may be. Assumptions for the scenario, its methodology and outcome are discussed and approved by appropriate forums and committees.

Systemic scenario – uniform stress test

In line with customary world-wide practice, the Supervisor of Banks conducts a uniform macro-economic stress scenario for the banking system, designed to test systemic and individual financial stability in a different macro-economic environment and risk concentrations the banking system is exposed to.
In April 2024 the Bank Supervisor published a uniform macroeconomic stress scenario in which the Iron Swords war escalates and becomes a regional war in 2024. The intensification of the war has led to a sharp increase in uncertainty and a drop in economic activity, the GDP has shrunk, unemployment has increased and the Bank of Israel has raised interest rates. The country's risk premium increased, leading to a sharp drop in the country’s credit rating. The results of the systemic stress scenario were calculated based on data for the end of 2023 and submitted by the banks in July 2024. According to the results, in this stress scenario as well, the Bank retains its robustness and stability throughout the scenario period, while maintaining appropriate regulatory capital and leverage ratios.
In February 2025, the Supervisor of Banks published a uniform stress scenario for 2024 - a system-wide scenario for the banking system. The results of the scenario will be reported to the Supervisor of Banks during the first half of 2025.

ICAAP process (Internal Capital Adequacy Assessment Process)

ICAAP is a process for self-assessment of capital needs (assessment of capital in Pillar 2 in conformity with the Bank of Israel’s guidance based on the Basel Committee directives), designed to ensure that overall capital at the Bank is in line with its risk profile, specified capital targets and business targets, in conformity with the work plan and with current capital planning. This is done both in the normal course of business and under stress scenarios. Moreover, Pillar 2 includes qualitative assessment processes for the level of various risks, the quality of their management, and identification of risk concentrations material for the Bank.

The ICAAP document is extensively discussed and approved by Bank management, Board committees (Risks Management Committee and Audit Committee) and by the Board of Directors plenum. The 2024 ICAAP document was submitted to the Bank of Israel at the end of 2024.

The ICAAP document includes qualitative and quantitative references to all risk aspects at the Bank at a Group level: Concise qualitative and quantitative analysis of material risks to the Bank, the capital targets, current risk profile and outlook of the Bank for 2024, developments during the year in conformity with the risk self-assessment process, assessment of the impact of anticipated developments on various risks and presentation of the Bank's overall risk map.

Capital planning is carried out for a period of three years, and is used to calculate the required capital allocation with respect to each of the risks, from the requirements specified in Pillar 1 with additional capital required with respect to Pillar 2, which includes capital allocation for risks not included in Pillar 1, such as: Credit concentration risk and interest risk in the banking portfolio and additional capital allocations with respect to risks included in Pillar 1, but the Bank assumes require additional capital allocation. The capital allocation is calculated both for normal conditions and for stress scenarios. The stress scenarios are intended to ensure that the Bank has sufficient capital cushions to survive even stressed scenarios, with high impact and very remote likelihood of materializing, and that the Bank is in compliance with the limit on Tier I equity ratio for the stressed scenario – minimum Tier I equity ratio of 6.5%.

The annual self-assessment process at the Bank to review capital adequacy indicates that the Bank has sufficient capital to face the various risks associated with Bank operations, both in the normal course of business and under stress scenarios throughout the planning period. Furthermore, the Bank has available total capital higher than the total capital required by ICAAP, even after applying stress scenarios and a stressed scenario. Moreover, that Tier I capital ratio under the stress scenario, for each year of the scenario period, does not drop below 6.5%. Note that in the ICAAP results show that the Bank had a significant excess capital buffer due to the mortgage portfolio, for which the regulatory capital allocation is significantly higher than global common practice, also with regard to allocation in accordance with the Basel IV Directive in its existing format.

Risk factor severity

The Bank has specified a framework for risks management and control by the Group, which includes mapping of material risks, and s assignment of Risk Owners for all risks. For each risk, the Bank estimates its potential impact on business operations over the coming year.

The table below lists the risk factors, executives appointed as Risk Owner for each one and management assessment of the impact of each risk factor, on a scale of five risk levels: Low, Low-medium, Medium, Medium, Medium-High and High.

The risk assessment for each risk and examination of their materiality level is reviewed as part of the ICAAP process (a self-assessment of capital adequacy) in the annual assessment process, the RAS (Risk Assessment System), which is a uniform methodological process adapted to regulatory requirements, in which the overall risk levels, management quality and risk profile for all material risks at the Bank are specified. This is based on risk benchmarks, qualitative parameters and subjective assessments.
Furthermore, on a quarterly basis, in line with results of the Bank's annual ICAAP process, up-to-date risk assessments are carried out for each of the risks in accordance with the actual risk profile, which include quantitative and qualitative indices, developments in the business environment and macroeconomic environment, and the existence of appropriate management and monitoring processes and emergency plans for dynamic, rapid response designed to minimize damage upon materialization of events. The up-to-date risk assessments are extensively discussed by Bank management and Board of Directors.
Despite the improvement in economic parameters and in the security situation following the ceasefire in the north and the suspension of fighting in the south, and despite the fact that no material changes were observed in the different risk metrics, the Bank has not changed its risk assessments, and they reflect the uncertainty as to the stability of the security situation in view of the ceasefires and their effect on the economic activity.

Below is a mapping of risk factors, their potential impact on the Bank Group and executives appointed Risk Owners for each risk factor:

Risk factor	Effect of the risk factor	Risk owner
Overall effect of credit risks(1)	Medium	Manager, Corporate Division
Risk with respect to borrower and collateral quality	Medium-High	
Risk from industry concentration(1)	Low-Medium	
Risk with respect to concentration of borrowers / borrower groups	Low	
Risk with respect to mortgage portfolio	Low-Medium	
Overall impact of market risks(2)	Low-Medium	Manager, Financial Division
Interest risk	Medium	
Inflation risk	Low-Medium	
Foreign currency risk	Low	
Liquidity risk	Low-Medium	Manager, Financial Division
Overall effect of operational risk	Medium	Manager, Risks Management Division
Cyber and information security risk	Medium	Manager, Risks Management Division
IT risk	Medium	Manager, Mizrahi Tefahot Technology Division Ltd.
Legal risk	Low-Medium	Chief Legal Counsel
Compliance and regulatory risks(3)	Low-Medium	Manager, Risks Management Division
Reputational risk(4)	Low	Manager, Marketing, Promotion and Business Development Division
Strategic business risk(5)	Low-Medium	President & CEO
Regulatory business risk	Medium-High	President & CEO

(1) Includes concentration in construction and real estate customers sector.
(2) Includes options and shares risk.
(3) Includes AML and terror financing risk and cross-border risk.
(4) The risk of impairment of the Bank's results due to negative reports about the Bank.
(5) The definition of strategic business risk includes the risk embodied in the capital planning and management process.

Below are major developments with regard to risk factors during the reported period:

The Bank's risk profile and risk assessments for the fourth quarter of 2024 remained unchanged compared to assessments issued in the third quarter of 2024. This is despite the fact that in the fourth quarter economic activity in Israel has started recovering, due to, among other things, the ceasefire agreement in the north.

Despite of the improvement in economic activity in Israel, risk assessments remain unchanged and reflect the economic uncertainty arising from developments in the macroeconomic environment, the effects of the imposition of taxes by the government on Israeli households and businesses, as well as the geopolitical uncertainty in connection with the stability of the ceasefires in the north and in the south.

The impact of the war on the risk assessments and the possible increase in risk, were presented starting from the third quarter of 2023. The assessed risk in borrower and collateral quality increased in the third quarter of 2023, reflecting concerns about increases in business credit risk – even though there are no indications of an increase in risk. The risk levels of all of the risks remained unchanged in this quarter, and currently they are adequate, and are in line with the economic and geopolitical uncertainty. The Bank continues to monitor developments and their effects on economic activity and, consequently, on Bank activity and various risk aspects, and will revise the risk assessments accordingly.

Note that the risk assessments of all of the risks, prior to the war, reflect uncertainty which about the economy, with regard to the global geo-political effects, the state of the global and local economies and changes to the macro-economic environment, as well as the high interest environment and implications thereof, as well as uncertainty regarding the Government's plans to promote changes in the legal system and the public dispute concerning these.

Developments in risk assessments for the fourth quarter of 2024:

1. Strategic business risk

Strategic business risk remained unchanged at Low-Medium; at the strategic level there has been no change to the Bank's business model, and the Bank operates based on the current strategic outline and is beyond the business targets set in the original strategic plan (for 2021-2025).

Strategic business risk incorporates all of the Bank's business operations, also reflecting the risk in the Bank's business environment. The current risk level reflects the economic and geopolitical uncertainty in connection with the stability of the security situation in view of the ceasefire and the potential effects on the economy and the banking system. The Bank maintains appropriate safety margins for minimum capital and leverage ratios.

2. Regulatory business risk

The regulatory business risk level remained unchanged at Medium-High; it reflects the potential of the intensification of legislative and banking regulation measures. The risk refers to the impact of new legislative and regulatory steps on core subjects of the financial system and uncertainty with regard to developments and exposure of Bank operations to potential regulatory changes, that may impact core operations of the Bank.

3. Credit risk

In the fourth quarter of 2024, economic activity in Israel has started recovering, mainly due to the agreement for ceasefire in the north. Furthermore, there are no indications that risk levels have increased compared to the previous quarter. At this stage, despite the improvement in economic conditions and the ceasefire agreement in the south, which came into effect in January 2025, the risk level remains unchanged and reflects the uncertainty in connection with the stability of the security situation and the potential economic effects of taxation steps taken by the government, and the effects of interest rates and inflation on the business sector.

In view of the war and its implications for Bank customers, the Bank has announced a range of relief measures for borrowers, designed to facilitate the debt burden, including loans at preferential terms, bonuses to affected small businesses, payment deferment etc. During December 2024, the Bank of Israel published the sixth phase of the comprehensive assistance outline to customers for dealing with the consequences of the Iron Swords War, and the Bank operates in accordance therewith. The Bank also participates in the loan fund for businesses, launched by the Government in early November 2023, and extended support loans to businesses under special tracks as part of the "North South" Fund.

A. Overall effect of credit risks

The overall level of credit risk remained Medium. The risk level for the quality of borrowers and securities is slightly higher than previously, reflecting the economic and geopolitical uncertainty, and its impact on the borrowers' activity; this might affect the credit risk level.

In the third quarter of 2023, the risk pertaining to borrower and collateral quality increased due to economic deterioration as a result of the war and its potential impact on borrowers in particular and business activity in general. The Bank closely monitors the potential effects and constantly reviews the risk measures and risk levels, adapting them as required to current business activity, subject to and in line with the risk appetite, monitors resumption of payments by all customers who postponed payments, and takes steps to improve borrower repayment capacity and to reduce the risk level.

As of December 31, 2024, deferred payments for business segment customers amounted to NIS 84 million, out of the total loan balance that has undergone changes to terms amounting to NIS 259 million.

As of December 31, 2024, deferred payments for individual segment customers amounted to NIS 33 million, out of the total loan balance that has undergone changes to terms amounting to NIS 87 million.

B. Credit risk in the construction and real estate sector

The assessment of the total impact of credit risks and sector concentration includes the risk assessment with respect to Bank exposure to the construction and real estate sector. The Bank is mostly focused in this sector on extending credit for construction using the financial support method (closed assistance). Most of the credit risk in the construction and real estate sector is backed by real estate fully pledged to secure loan repayment, and for credit not secured by real estate collateral, there is other collateral in place, such as: deposits, securities etc. The share of the construction and real estate sector in Israel out of total credit risk to the public at the Bank is approx. 16.4%.

The effect of the economic uncertainty increases - to a certain extent - the systemic risk in the real estate sector. The Iron Swords War led to an increase in risk levels in this sector, due to slower progress of construction due to shortage of labor and slow-down in activity on some construction sites, which may cause delays in apartment delivery and decrease in residential construction starts. In addition, raw material prices and workers' salaries have increased.

During 2024 there has been a recovery in the demand side and in the number of transactions, and residential units were also purchased in areas located close to the conflict zones. The Bank tracks the development of the industry's risk characteristics and the effects of changes on Bank operations, including monitoring the portfolio and focusing on risk concentrations.

For more information about credit risk in the construction and real estate sector, see chapter "Credit risk" in the Report of the Board of Directors and Management.

C. Credit risk in the residential mortgage portfolio

The risk level in the mortgages portfolio remains unchanged, at a low-medium level. Despite the positive developments, uncertainty remains as to the stability of the security situation in view of the ceasefire and its impact on economic activity; uncertainty also remains as to the potential cumulative effect of interest and inflation rates on borrowers' repayment capacity.

Note that during COVID, which saw extensive mortgage deferment, in actual fact, it turned out that upon the economy resuming normal activity, the risk potential in the mortgage portfolio did not materialize.

The risk benchmarks throughout 2024 did not indicate any material change in risk level, and therefore the risk assessment remained unchanged. The Bank continues to monitor the developments and their impact of economic growth and activity. Most of the customers who deferred payments resumed normal payments, and the Bank deals in an orderly manner with customers who still defer payments.

As of December 31, 2024, deferred payments for residential mortgages segment customers amounted to NIS 115 million, out of the total loan balance that has undergone changes to terms amounting to NIS 5.2 billion.

4. Market and interest risks

The overall risk level of market and interest risk remained Low-Medium. Interest risk remained Medium, and reflects the high interest rate environment and the potential impact on borrowers and depositors' behavior, in particular the trend of balance transition from current accounts to deposits and changes to mortgage performance mix towards options less sensitive to changes in interest rates. The risk values are within the limits of the Bank's risk appetite.

5. **Liquidity risk**

Liquidity risk remained low-medium. In light of the ceasefire agreement in the southern front, which came into effect in January 2025 and in view the calm in the markets, it was decided to lower the Bank’s state of alert regarding liquidity by one notch, after it has increased by one notch since the outbreak of the war and due to the security situation and its effects. The Bank closely monitors the potential changes in the situation. In practice, no events nor indications were observed which would indicate realization of a liquidity event. In the fourth quarter of 2024, the Bank maintained high liquidity by investing excess liquidity in liquid assets of very high quality – Level 1 assets. As of December 31, 2024, the average (consolidated) liquidity coverage ratio amounted to 135%. The net stable funding ratio (on a consolidated basis) as of December 31, 2024 was 113% and there were no deviations from the risk appetite limitations. The Bank maintains high surplus foreign currency, and closely manages its liquidity based on specified guidelines, including ongoing review of Bank compliance with systemic emergency scenarios.

6. **IT risk**

The technology risk remained Medium. This is a material risk factor for the Bank, and potential damage due to its realization may be significant. Technological activity is focused on changing needs in line with the Bank's business strategy, and taking as many steps as possible to mitigate the probability of the realization of the technological risks and the potential damage of their realization.

7. **Information security and cyber defense risk**

The information security and cyber risk level remained medium. During the year, a small number of fraud attempts against customers (through phishing attacks) were identified, in which their account credentials were stolen in order to conduct un-authorized transactions in their accounts. Thanks to defensive measures applied by the Bank, despite these fraud attempts, there were no unauthorized transactions in customer accounts. During 2024 several DDoS attacks were conducted against the Bank's marketing website. Throughout this attack, the Bank app and transaction website operated normally, and this attack had no impact on the Bank's business activity, and concurrently, the Bank expanded its response capabilities to attacks of this sort.

During 2024 the risk of attempted cyber attacks in the banking system increased due to the war, and so did the potential for materialization of this risk. In order to identify and thwart cyber events, the Bank has raised its alert, vigilance and readiness for such events. There is constant activity by attack groups, along with continued activity and bolstering of the Bank's control and protection system. Note that despite the increase in cyber risk world-wide and in Israel, due to, among other things, increased use of cloud environments, increased remote working and more sophisticated attacks, primarily ransom attacks – the ongoing actions taken by the Bank in recent years to enhance the risk management processes have maintained risk at the Bank unchanged.

8. **Compliance and regulatory risks**

Compliance and regulatory risk remained Low-Medium. The Bank applies the current and new regulatory provisions. During 2024 and against the backdrop of the war, the inherent systemic risk increased, due to effects of the war and of the global geopolitical situation, resulting in expansion of management focus and monitoring at the Bank on issues of compliance, AML and prohibition of terror financing as applicable. Moreover, the Bank operates within the international banking framework that applies cross-border enforcement rules, and has therefore set a specific policy regarding the implementation of international sanctions.

9. **Reputational risk**

The Bank's reputational risk remained Low. The Bank regularly monitors various benchmarks and indicators with regard to the Bank's reputation, indicating that the Bank has maintained a leading image in the service, fairness and perception as a different bank axes. Among Bank customers, the high image reception levels remain. Satisfaction from the service experience offered by the Bank remains high and stable and managed systematically using a variety of tools.

10. **Legal risk**

Legal risk remained Low-medium. In this quarter there were no unusual events which may impact Bank exposure. Legal risk is defined in Proper Conduct of Banking Business Directive 350 regarding "Operational risks" and includes absence of potential for legal enforcement of an agreement and includes, but is not limited to exposure to fines or penalties arising from supervisory action, as well as from individual arrangements.

Legal risk also includes risks arising from legal exposure due to Bank conduct with its various stakeholders (such as: customers, suppliers and other third parties).

The Bank's Legal Division regularly analyzes the legal risk components, the risk boundaries (arising, for example, from the counter-party identity, from creation of collateral etc.) as well as specific risk attributes while reviewing its risk level and exposure with attention to the different lines of business at the Bank and provides current legal advice to the Bank and its various units.

Strategic plan
For more information about the Bank's strategic plan for 2021-2025, see chapter "Business goals and strategy" of the Report of the Board of Directors and Management for 2024.

Major and emerging risks

The Bank's business activity exposes the Bank to various financial and non-financial risks, whose materialization has potential to impact the Bank's business results or image. Top risks and evolving risks are derived from the Bank's business environment, which is impacted by the macro-economic environment, by risk associated with regulation and legislation, by changes to the business model and by social and consumer trends. In recent years, due to changes in the competitive landscape, in the consumer environment, in the regulatory environment and in technology, non-financial risks have been evolving.
As part of processes conducted by the Bank to map and identify risk, the Bank reviews major risks, existing or new, arising from developments in the Bank's business environment, which may materialize over the coming year and with potential to materially impact the Bank's financial results and stability. The Bank also identifies emerging risks, which may materialize over the longer term, with uncertainty about their nature and impact on the Bank. The risk mapping at the Bank is regularly reviewed to ensure it covers all risks associated with the Bank's business activity, or influenced by market conditions and from regulatory requirements.

1. **Strategic business risk** – is the risk, in real time or in future, to Bank profits, capital, reputation or status, which may arise from erroneous business decisions, improper deployment of decisions by the Bank or inappropriate alignment of the Bank to changes in the business environment in which it operates. The Bank is preparing for these changes by, inter alia, adapting the banking production functions through, inter alia, increased investment in technology, so as to maintain the Bank's position as an advanced, human bank. This is material risk requiring risk management measures to be applied, assessment and early identification of events which may preclude implementation of the strategy.

   Macro-economic risk – included in the occurred business risk, and refers to the state of the local and global economy, significant changes in monetary policy and in interest rate curves, market volatility and changes in prices of financial assets in Israel and world-wide and in real estate prices may potentially impact Bank operations. In January 2024, the Bank of Israel lowered its interest rate by 0.25%, to 4.5% and since then the interest rate remained unchanged. The inflation rate in 2024 was 3.2%.

2. **Regulatory business risk** – This risk refers to legislation, including legislation in process, in core banking areas, as well as new regulation and regulatory expectations of regulatory entities, whether in process or completed, which may potentially impact core banking operations.

3. **IT risk** - Technological risk is a significant risk, affected by accelerated evolution in technology and digital domains and by the need to provide response to changing customer and Bank needs, multitude of banking regulatory requirements and the need to implement technological tools within a short timeframe. The Technology Division operates to support normal Bank operations and to provide a response to current and future technology requirements for such operations.

   As part of bolstering its technology infrastructure, the Bank invests heavily in technology systems, in order to address the evolving challenges in the business environment, while maintaining its differentiation as an advanced, human bank. The Bank is developing advanced tools for analyzing data and extracting information from data, in order to improve its measuring capacity and decision making, both from business marketing aspects and from risk management aspects.

4. **Information security and cyber defense risk** – Information security risk is risk arising from faults in protection of the Bank's computer systems and information stored there. Cyber risk materializes in case of an event including an attack on computer systems by or on behalf of internal or external adversaries of the Bank. The Bank's information security and cyber team operates fully and continuously, improving and bolstering defense capabilities and mechanisms, in conformity with expansion of threats and challenging needs which the Bank is required to face. In view of the war, the Bank significantly raised its alert, vigilance and readiness in order to identify and avert any cyber events. The Bank also acts to prevent fraud, by bolstering its monitoring activity to identify any suspect activity in customer accounts.

5. **Compliance and regulatory risk** – Bank business operations are subject to regulation.[1] Compliance risk is the risk of the imposition of sanctions, material financial loss or damage to reputation, which the Bank may incur due to its failure to comply with various compliance provisions. Compliance provisions also include the following laws: ISA Enforcement Proceeding Streamlining Law (Legislative Amendments), 2011; Securities Law 1968; Mutual Investment Law, 1994; Arrangement of Engagement in Investment Consultancy, Investment Marketing and Management of Portfolios Law, 1995 (hereinafter: "the Advisory Law"); (hereinafter jointly – "securities laws") as well as the Economic Competition Law, 1988. Compliance with these laws is also handled by internal enforcement programs of securities laws and economic competition laws, respectively. Compliance risk also includes Bank compliance with fairness aspects and with the provisions of the Privacy Protection Law, 1981 and regulations promulgated thereunder. As part of the Bank's addressing this issue, the Chief Compliance Officer was appointed as the officer in charge of privacy protection.

   Note that the Bank has practically zero risk appetite for compliance and regulatory risk, with regard to compliance with statutory provisions applicable to the Bank. Therefore, the Bank has determined that any deficiencies found in compliance with statutory provisions should be addressed by Bank units as a top priority. The Bank has specified a multi-annual work plan, which includes required action for reducing compliance risk.

6. **Environmental risk and climate risk** – such risks are part of ESG (Environment, Society and Governance) risks - emerging risks which are characterized with greater changes compared to other risks over time.

   A. **Environmental risks** are risk deriving from the Bank's potential exposure to loss due to deterioration in the borrower's financial position due to high costs incurred as a result of environmental hazards (such as air and water pollution, soil contamination), regulation concerning environmental protection, or due to the Bank being indirectly liable for an environmental hazard caused by a project funded by the Bank. Environmental risk also includes other, derived risks: reputation risk, third-party liability risk and so forth.

   B. **Climate risks** are due to increased frequency and intensity of weather events due to climate change. The Bank faces risk of financial loss or impact to its reputation, due to materialization of physical events, processes or adjustment to transition risk due to climate change. Climate risks include:

      - Transition risks, which are estimated to be long-term risk an which may derive from the adaptation to a low-carbon economy motivated by changes in regulation, legislation and government policy (such as a move to renewable energy sources, carbon taxes, improving energy efficiency and more).
      - Physical risk, that may materialize due to direct impact of extreme climate events, such as flooding, storms, heat waves, cold snaps, fires, ongoing changes that may derive from rising sea levels and temperature changes that may affect the ecological system, desertification processes and so forth.

   In recent years, there has been growing awareness in Israel and world-wide of the existence and extent of financial risk due to potential impact of events and processes related to climate change. The Bank is preparing to implement Proper Conduct of Banking Business Directive 345 "Principles for effective management of climate-related financial risk", issued by the Supervisor of Banks in June 2023, and which will come into effect in June 2026.

   In 2024 the Bank published a TCFD report (Task Force on Climate-Related Financial Disclosures) for 2023, presenting the Bank's assessments of effective management of climate risk. This report was created in conformity with the generally accepted global standard for such reporting and was included in the ESG report for 2023. The Bank is expected to publish a TCFD report for 2024 in the first quarter of 2025.

   For more information about management of these risks, see chapter "Environment, society and governance" in the 2024 Report by the Board of Directors and Management and 2023 ESG report.

   This information constitutes forward-looking information, as defined in the Securities Law, 1968, based on assumptions, facts and data (hereinafter jointly: "assumptions") brought before the Bank's Board of Directors. These assumptions may not materialize due to factors which are not solely controlled by the Bank.

[1] Compliance and regulatory risks may arise from non-compliance with regulatory directives applicable to business operations, vs. regulatory business risk, which refers to the impact of new legislation and regulation in core matters of the financial system.

Overview of weighted risk assets (OV1) (NIS in millions)

	Risk weighted assets		Minimum capital requirements[(1)]
	December 31, 2024	**September 30, 2024**	**December 31, 2024**
Credit risk (standard approach)[(2)]	270,704	261,915	33,838
Counter-party credit risk (standard approach)	4,076	4,168	509
Credit risk value adjustment (CVA)[(3)]	1,421	1,478	178
Settlement risk	300	308	38
Amounts lower than discount threshold (subject to 250% risk weighting)	5,786	5,986	723
Total credit risk	**282,287**	**273,855**	**35,286**
Market risk (standard approach)	1,675	1,755	209
Operational Risk[(4)]	23,402	22,926	2,925
Total	**307,364**	**298,536**	**38,420**

(1) Capital requirement in conformity with required overall minimum capital ratio of 12.5%.
(2) Credit risk excludes counter-party credit risk, credit risk value adjustment and amounts lower than the deduction thresholds.
(3) Credit Value Adjustments – mark to market with respect to credit risk of counter-party, in conformity with Basel III provisions.
(4) Capital allocation with respect to operational risk was calculated using the standard approach.

Additional information about weighted risk assets

Below is the movement in weighted risk assets during the period, for each type of weighted risk asset (NIS in millions):

	For the year ended December 31	
	2024	**2023**
Movement in credit risk assets		
Balance as of January 1	252,842	234,383
Change in credit exposure risk assets	18,866	13,427
Change in securities exposure risk assets	313	454
Change in derivatives exposure risk assets	(64)	116
Change in off-balance sheet exposure risk assets	5,745	3,366
Change in CVA	139	52
Regulatory changes	-	-
Downgrading of the State of Israel's rating	3,679	-
Other effects	767	1,044
Credit risk assets at end of period	282,287	252,842
Movement in operating risk assets		
Balance as of January 1	20,641	16,567
Change in revenues from financing operations (including commissions)	2,471	3,842
Change in non-interest financing revenues	129	217
Change in gross revenues of subsidiaries	161	15
Operating risk assets at end of period	23,402	20,641
Movement in market risk assets		
Balance as of January 1	1,957	1,301
Change in interest risk – general market risk	147	274
Change in basis risk	(422)	418
Change in equity risk	9	(9)
Change in options risk	(16)	(27)
Market risk assets at end of period	1,675	1,957

Capital and leverage

Composition of supervisory capital

		December 31, 2024	December 31, 2023
Tier I equity: Instruments and retained earnings			
1	Ordinary share capital issued by the banking corporation and ordinary share premium for shares included in Tier I equity	3,726	3,675
2	Retained earnings, including dividends proposed or announced after the balance sheet date	27,782	24,196
3	Cumulative other comprehensive income and retained earnings disclosed	(215)	(408)
5	Ordinary shares issued by consolidated subsidiaries of the banking corporation, which are held by a third party (non-controlling interests)	589	567
6	**Tier I equity before regulatory adjustments and deductions**	31,882	28,030
Tier I equity: Supervisory adjustments and deductions			
8	Goodwill, net of any deferred tax liabilities	87	87
9	Other intangible assets, excluding mortgage service rights, net of deferred tax liabilities payable(1)	20	40
10	Deferred tax assets to be realized based on future profitability of the banking corporation, excluding deferred tax assets due to temporary differences	-	-
11	Accumulated other comprehensive income with respect to cash flows hedging of items not listed at fair value on the balance sheet	5	4
14	Un-realized gains and losses from changes to fair value of liabilities arising from changes to the banking corporation's own credit risk. Furthermore, with regard to liabilities with respect to derivative instruments, all accounting value adjustments (DVA) arising from the bank's own credit risk should be deducted	11	14
21	Deferred tax assets arising from temporary differences, whose amount exceeds 10% of Tier I equity	-	-
26	Supervisory adjustments and other deductions stipulated by the Supervisor of Banks	(204)	(549)
26.C	Of which: Additional supervisory adjustments to Tier I equity, not included in sections 25.A. and 25.B.	-	-
28	**Total supervisory adjustments and Tier I deductions**	(81)	(404)
29	**Tier I shareholders' equity**	31,963	28,434
44	**Additional Tier I capital**	-	-
45	**Tier I capital**	31,963	28,434
Tier II capital: Instruments and provisions			
46	Instruments issued by the banking corporation (not included in Tier I capital) and premium for such instruments	2,188	2,176
47	Tier II capital instruments issued by the corporation qualifying for inclusion in supervisory capital during the transition period	-	-
48	Tier II capital instruments issued by subsidiaries of the banking corporation to third-party investors	3,380	3,029
49	Of which: Tier II capital instruments issued by subsidiaries of the banking corporation and held by third-party investors, gradually deducted from Tier II capital	-	-
50	Group provisions for credit losses by effect of related tax	3,529	3,161
51	**Tier II capital before deductions**	9,097	8,366
Tier II capital: Deductions			
57	**Total deductions from Tier II capital**	-	-
58	**Tier II capital**	9,097	8,366
59	**Total capital**	41,060	36,800
60	**Total risk weighted assets**	307,364	275,440
Capital ratios and capital preservation cushions			
61	Tier I shareholders' equity	10.40%	10.32%
62	Tier I capital	10.40%	10.32%
63	Total capital	13.36%	13.36%

		December 31, 2024	December 31, 2023
Minimum requirements stipulated by the Supervisor of Banks			
69	Minimum Tier I equity ratio required by Supervisor of Banks	9.60%	9.60%
70	Minimum Tier I equity ratio required by Supervisor of Banks	9.60%	9.60%
71	Minimum capital ratio required by the Supervisor of Banks	12.50%	12.50%
Amounts lower than the deduction threshold (before risk weighting)			
72	Investments in capital of financial corporations (other than banking corporations and subsidiaries thereof), up to 10% of ordinary share capital issued by the financial corporation, which is below the amortization threshold	58	47
73	Investments in Tier I equity of financial corporations (other than banking corporations and subsidiaries thereof), over 10% of ordinary share capital issued by the financial corporation, which is below the amortization threshold	3	2
75	Deferred tax assets created due to temporary differences, which is below the amortization threshold	2,311	2,327
Cap for inclusion of provisions in Tier II			
76	Provision qualifying for inclusion in Tier II with regard to exposures under the standard approach, before application of the cap	3,668	3,569
77	Cap for inclusion of provision in Tier II with regard to exposures under the standard approach	3,529	3,161

For more information about the link between the balance sheet and supervisory capital components, see Addendum A below.

Report on movements in supervisory capital components during the period, including changes to Tier I equity, Tier I capital and Tier II capital (NIS in millions):

	December 31, 2024	December 31, 2023
Tier I capital		
Balance as of January 1	28,434	25,072
Changes to capital components:		
Issuance of ordinary share capital and share premium	15	37
Change in capital reserve from benefit from share-based payment transactions	35	19
Net profit for the period	5,455	4,910
Dividends	(1,869)	(1,390)
Adjustments from translation of financial statements of associates	-	-
Capital reserve from securities available for sale	128	101
Capital reserve from cash flows hedging	1	4
Capital reserve with respect to employee rights	65	(15)
Others, including regulatory adjustments	-	-
Non-controlling interests	22	24
Changes to effect of supervisory adjustments and deductions		
Goodwill and intangible assets	20	20
Accumulated other comprehensive income with respect to cash flows of items not listed at fair value on the balance sheet	(1)	(4)
Accumulated gains or losses from changes to fair value of liabilities, arising from change to the Bank's credit risk	3	(8)
Others	(344)	(336)
Balance as of end of period	**31,964**	**28,434**
Tier II capital		
Balance as of January 1	8,366	8,015
Deduction of equity instruments	136	3
Changes to group provisions for credit losses before related tax effect	368	583
Issue of equity instruments	1,463	554
Redemption of bonds with contingent conversion	(1,237)	(789)
Balance as of end of period	**9,096**	**8,366**

Supervisory requirement

Supervisory capital is composed of two tiers: Tier I capital (including Tier I equity and Tier I additional capital) and Tier II capital.

Tier I capital includes equity attributable to equity holders of the Bank and the interest of external shareholders in equity of subsidiaries (excess capital at subsidiaries is not taken into account).

Tier I capital includes supervisory adjustments and deductions from capital – goodwill, investments in capital components of financial institutions, cumulative other comprehensive income with regard to cash flow hedges for items not presented at fair value on the balance sheet adjustments with respect to liabilities for derivative instruments, due to change in the Bank's credit risk (DVA) and other supervisory adjustments and deductions.

Additional Tier I capital consists of equity instruments which fulfill the requirements specified in the directives. As of December 31, 2024, the Bank had no capital instruments included in additional Tier I capital.

Tier II capital consists of a group provision for credit losses and equity instruments which fulfill the specified requirements.

Restrictions on capital structure:

- Tier II capital shall not exceed 100% of Tier I capital after required deductions from such capital.

- Capital instruments qualified for inclusion in Tier II capital shall not exceed 50% of Tier I capital after required deductions from such capital.

Bank approach to capital adequacy assessment

The risks management and control framework at the Bank, as recommended by the Basel Committee, specifies three pillars for capital adequacy assessment:
Pillar 1 – minimum capital – minimum capital allocation requirements with respect to credit risk, market risk and operational risk calculated by standard models.
Pillar 2 – Supervision and control process over capital adequacy, the Internal Capital Adequacy Assessment Process (ICAAP) conducted by the Bank, as well as the Supervisory Review and Evaluation Process (SREP).
Pillar 3 – ("market discipline”) – reporting and disclosure requirements to supervisory entity and to the public.

Capital ratios are calculated as the ratio of capital to weighted risk assets. Tier I equity ratio us calculated as the ratio of Tier I equity to weighted risk assets, and the total capital ratio is calculated as the ratio of total capital to weighted risk assets.

As per instructions of the Supervisor of Banks, the Bank is required to maintain a minimum Tier I equity ratio of no less than 9% and a minimum total equity ratio of no less than 12.5%.

An additional capital requirement was added to the Tier I equity ratio at 1% of the residential mortgage balance as of the dates of financial statements, except for residential mortgages, which are subject to relief provided in the interim directive for addressing the Corona Virus crisis.

Accordingly, the Bank's required minimum Tier I capital ratio and minimum total capital ratio as of the report date are 9.60% and 12.50%, respectively (to which adequate safety margins will be added).

Capital planning and management

The Bank manages the capital adequacy ratio so as to comply with minimum capital requirements of the Supervisor of Banks. The Bank’s capital ratios are subject to changes due to the following, among other things:

- Growth in business activity.
- Actuarial changes due to changes to interest rates used to calculate Bank liabilities with respect to employee benefits, or other actuarial assumptions such as: mortality rates, retirement rates and so forth.
- Impact of changes to capital reserves from bonds available for sale due to changes in interest rates.
- Impact of changes to inflation and exchange rates on the Bank's risk asset balances.
- Impact of changes to the State of Israel's credit rating on the risk weighting assigned to Israeli corporations, which is based on the State rating.
- The effect of the credit rating of third parties, which insure specific Bank credit risks.
- Regulatory changes which may affect the capital or the risk assets.

The Bank regularly monitors its capital adequacy and leverage ratio, in order to ensure compliance with requirements of the Supervisor of Banks, as well as to prepare in advance to respond to evolution of risk assets and capital requirements at the Bank. To this end, the Bank’s Board of Directors has specified a policies document which set the principles required for management of the capital adequacy ratio and the leverage ratio, as well as the Bank's capital targets ("risk appetite"), which provide a safety margin beyond the minimum regulatory requirements for capital and leverage. The policy document specifies the safety margins for planning, as well as the required reports and actions to be taken should the capital ratio drop below the minimum required. Capital management and planning is conducted by a special forum headed by the Manager, Finance Division (CFO) and including the Manager, Risks Management Division (CRO), Manager, Financial Information and Reporting Division (Chief Accountant) and managers of corporate divisions at the Bank. On-going capital planning is based on the assumptions in the Bank's work plan, subject to capital and leverage targets and to the dividend distribution policy

The Bank prepares a detailed, multi-annual capital planning forecast, taking the following into consideration: Expected growth rate of risk assets and profitability, the strategic plan, dividend distribution policy, capital and leverage targets, appropriate safety margins and other factors.

The Bank regularly monitors actual vs. forecast results, and revises the forecast as needed, considering any required action to comply with the specified capital targets.

The Risks Management Division conducts processes to challenge the capital planning which review, inter alia, the appropriateness of safety margins used in capital planning; the outcomes of these processes are brought for discussion by the Capital Management Forum, by Bank management and by the Board of Directors' Risks Management Committee.

Below is analysis of the impact of changes on Tier I equity ratio as of December 31, 2024:

	Impact of change by NIS 100 million in Tier I equity	Impact of change by NIS 1 billion in total risk assets
Bank (consolidated data)	0.03%	0.03%

Regulatory directives that impact capital adequacy ratios

Effect of application of accounting principles with regard to expected credit losses on supervisory capital
As from January 1, 2022, the Bank applies the new directives with regard to expected credit losses (CECL) and charges the cumulative effect to retained earnings upon initial application. According to the Supervisor of Banks' circular, if, due to initial application of these rules, the banking corporation's Tier I equity should decrease, then the banking corporation may partially include in Tier I equity (i.e. add back to Tier I equity) the decrease in Tier I equity recorded upon initial application, over three years (hereinafter: "transition period").
The effect of this relief on the Tier I capital ratio was 0.03% as of December 31, 2024.
For more information about the effect of initial application, see Note 1 to the 2022 financial statements.

Raising of capital sources

As part of the Bank work plan, determined by the Board of Directors and including growth targets for diverse areas of operation, the Bank assesses the impact of achieving these targets on total risk assets at the Bank and, consequently, on the capital adequacy ratio. Accordingly, along with business and profitability objectives, a plan is set to raise capital sources in order to maintain capital adequacy, in accordance with instructions of the Board of Directors concerning capital adequacy.
The plan includes issue of contingent subordinated notes (Contingent Convertibles – CoCo) as needed and should ensure that the overall capital ratio would not be lower than the minimum capital ratio required by the Supervisor of Banks. This information constitutes forward-looking information, as defined in the Securities Law, 1968, based on assumptions, facts and data (hereinafter jointly: "assumptions") brought before the Bank’s Board of Directors. These assumptions may not materialize due to factors which are not solely controlled by the Bank. For more information about issue and redemption of CoCo subordinated notes, see Note 25 to the financial statements.

For more information see Note 25 to the financial statements.

Leverage ratio

The Bank applies the rules in Proper Conduct of Banking Business Directive 218 with regard to leverage ratio, which adopts the Basel Committee recommendations with regard to leverage ratio, stipulated in January 2014.
The leverage ratio is reflected in percent, defined as the ratio of Tier I capital to total exposures. Total exposure for the Bank is the sum of balance sheet exposures, exposures to derivatives, to financing transactions for securities and off-balance sheet items.
According to the directive, banking corporations must maintain a leverage ratio of 5% or higher on a consolidated basis.
On November 15, 2020, the Supervisor of Banks issued a circular regarding "Adjustments to Proper Conduct of Banking Business Directives for addressing the Corona Virus (Interim Directive)", updating Proper Conduct of Banking Business Directive 250, whereby the leverage ratio shall be at least 4.5% on a consolidated basis, compared to 5% prior to this change.
In the Supervisor of Banks' circular dated December 20, 2023, the effect of this relief was extended through December 31, 2025. A banking corporation applying this relief at the time would be required to resume the required leverage ratio prior to the interim directive within two quarters, such that upon expiration of the interim directive, the banking corporation would be subject to a minimum leverage ratio based on the actual leverage ratio or the minimum ratio applicable to the banking corporation prior to the interim directive, whichever is lower.
The Bank's leverage ratio as of December 31, 2024 is 6.04%, compared to 5.83% as of December 31, 2023.

Comparison of assets on balance sheet and exposure measurement for leverage ratio (NIS in millions):

	NIS in millions	
	As of December 31, 2024	As of December 31, 2023
Total assets according to consolidated financial statements	485,643	448,204
Adjustments with respect to financial derivatives	3,908	2,373
Adjustments with respect to off-balance sheet items(1)	40,402	33,509
Other adjustments	(355)	3,397
Exposure for leverage ratio	529,598	487,483

(1) of off-balance sheet exposures to equivalent credit amounts, in conformity with Basel rules for capital adequacy measurement.

Composition of exposures and leverage ratio (NIS in millions):

	As of December 31, 2024	As of December 31, 2023
On-balance sheet exposures		
Assets on balance sheet	473,600	442,962
Amounts with respect to assets deducted to determine Tier I capital	(107)	(127)
Total on-balance sheet exposures	**473,493**	**442,835**
Exposures with respect to derivatives		
Subrogation cost for all transactions with respect to derivatives	1,841	2,198
Additional amounts with respect to future potential exposure for all transactions with respect to derivatives	7,536	6,417
Gross-up of collateral provided with respect to derivatives, deducted from assets on the balance sheet in conformity with Public Reporting directives	-	-
Deductions of receivable assets with respect to variable cash collateral provided in derivatives transactions	-	-
Exempt central counter-party leg of commercial exposures disposed by the customer	-	-
Adjusted effective par amount of credit derivatives written	-	-
Adjusted effective par offsets and deduction of additions with respect to credit derivatives written	-	-
Total exposure with respect to derivatives	**9,377**	**8,615**
Exposure with respect to securities financing transactions		
Gross assets with respect to securities financing transactions (without offsets), after adjustment for transactions accounted for as an accounting sale	6,326	2,524
Offset amounts of cash payable and cash receivable from gross assets with respect to securities financing transactions	-	-
Credit risk exposure for central counter-party with respect to securities financing assets	-	-
Exposures with respect to transactions as agent	-	-
Total exposure with respect to securities financing transactions	**6,326**	**2,524**
Other off-balance sheet exposures		
Off-balance sheet exposure in par value, gross	134,565	114,340
Adjustments with respect to conversion to credit equivalent amounts	(94,163)	(80,831)
Off-balance sheet items	**40,402**	**33,509**
Capital and total exposure		
Tier I capital	**31,963**	**28,434**
Total exposure	**529,598**	**487,483**
Leverage ratio		
Leverage ratio in conformity with Proper Conduct of Banking Business Directive 218	6.04%	5.83%
Minimum leverage ratio required by the Supervisor of Banks	4.50%	4.50%

Credit risk

This chapter discusses credit risk, in conformity with disclosure requirements of the Basel Committee and the FSB; the chapter structure and topic order (adjusted for the nature of Bank operations) are also in conformity with these requirements.

The chapter "Counter party credit risk" below includes qualitative and quantitative disclosures about the capital requirement with respect to this risk and adjustment to capital requirements with respect to credit risk (CVA).

General information regarding credit risk quality (CRA)

Credit risk is the risk that a borrower or counter party of the Bank would not meet their obligations to the Bank. Credit risk is a material risk for Bank operations. This risk is affected by these major factors: Business risk due to customer activities, concentration risk due to over-exposure to a borrower / borrower group and to economic sectors, geographic concentration risk, risk due to exogenous changes which mostly involve changes to the borrower's macro-economic environment, environmental risks and climate risks, overseas credit risks and operational risks which, should they materialize, would have implications for credit risks. Moreover, such risk is interrelated to multiple other risks, such as market and interest risk, liquidity risk, compliance risks and other risks.

Credit is at the core of banking activity, and therefore this is the primary risk of all risk types addressed by the banking system. Consequently, the lion's share of capital allocated in Pillar 1 is due to credit risk.

Credit risk management – objectives and policies

Mizrahi Tefahot Group has a conservative and stable credit risk profile thanks to, among other things, the composition of its credit portfolio, which is biased towards retail and mortgage operations.

The credit risks management policy seeks to balance the desire to minimize risks in as much as possible against Bank objectives to maximize profit by extending credit to customers. This is done taking into account affecting factors, such as: the regulatory environmental, market conditions, overall economic conditions, product type and behavior of competing banks.

The Bank's Board of Directors is responsible for setting the Bank's credit policies, which prescribe principles and rules for making credit available and for the management and control over the loan portfolio, in order to preserve its quality and mitigate its inherent risk. These principles and rules enable controlled management of the risks involved in granting loans to borrowers, at the level of the individual borrower, group of borrowers and the level of economic and business sectors – to the level of the entire portfolio. The Bank's Board of Directors annually approves the Bank's credit policy and reviews the need to revise this policy throughout the year, in view of development in the business environment in which the Bank and its customers operate. The credit policies includes other policy documents which discuss the relevant risks to the Bank's credit operations, including: Credit concentration policy, which ensures that the credit concentration level at the Bank is regularly managed and monitored; policy on customer trading activity in derivatives and securities, which stipulates the principles for management and monitoring of Bank customers with activity involving derivatives and securities; collateral policy, which stipulates the principles required for management of customer collateral, safety factors required by transaction type and risk factors; and the risk management policy for environmental and climate risks.

Credit risk consists of multiple layers and requires various entities at the Bank to monitor and take action so as to allow the Bank to control such risk. Therefore, the Bank has specified different quantitative limits for activities involving risk factors.

Business model

The Bank manages its credit operations in multiple segments, primarily: mortgages, business banking, commercial banking, households and small businesses. These segments differ by customer attributes, credit types and credit volumes requested, and by the organizational unit which handles each of these segments. Credit provided to these segments includes business credit, including credit for foreign trade operations and exposure due to operations involving derivatives, retail credit and mortgages. For more information about customer attributes in each segment, see chapter "Supervisory Operating Segments" in the Report by the Board of Directors and Management. The structure of lines of business with regard to credit is based on two divisions, reporting to the President & CEO, as follows:

- Retail Division – This division consolidates most the banking activity of individual customers (including international private banking in Israel serving foreign residents) and mortgages and the activity of small business customers. Bank branches and business centers operate under this division in seven geographic regions. The division is also in charge of to subsidiaries operating in the credit segment - Mizrahi Tefahot Leasing and Mizrahi Tefahot Discounting and Finance Ltd.

- Business Banking Division – This division handles most banking activity of business customers (including from the construction and real estate sector) who are medium-sized and over and international operations overseas.

Approach to credit risk policy and setting limits

The Bank's credit risk management policies prescribe principles and rules for making credit available and for the management and control over the loan portfolio, in order to preserve its quality and reduce the inherent risk. This is done taking into account affecting factors, such as: the regulatory environmental, market conditions, overall economic conditions, product type and behavior of competing banks. The policy principles enable controlled management of the risks involved in granting loans to borrowers, at the level of the individual borrower, group of borrowers and the level of economic and business sectors – to the level of the entire portfolio. The credit policies includes other policy documents which discuss the relevant risks to the Bank's credit operations, including: Credit concentration policy, which ensures that the credit concentration level at the Bank is regularly managed and monitored; policy on customer trading activity in derivatives and securities, which stipulates the principles for management and monitoring of Bank customers with activity involving derivatives and securities; collateral policy, which stipulates the principles required for management of customer collateral, safety factors required by transaction type and risk factors; and the risk management policy for environmental and climate risks.

The credit policies document is discussed and approved by the Senior Credit Committee and then by the Bank's Board of Directors. The Senior Credit Committee, headed by the Bank President & CEO, is the most senior forum for credit approval at the Bank. The Credit Risk Owner is the Manager, Corporate Division.

The Manager, Risks Management Division (CRO) is responsible for the policy document. The policy document specifies the risk appetite, consisting of a long list of benchmarks and risk factors relevant to the Bank's credit operations, including: Economic sectors, borrower groups, risk factors in the mortgage portfolio, unique activity types, quality of credit portfolio, overseas operations etc. and other risk factors relevant for the Bank's credit risk profile and its business operations.

Credit risk is also monitored using a range of stress tests, which estimate the potential impact of stress events on the Bank's credit portfolio. This is done, inter alia, in order to review the stability of Bank capital to various stress events and as part of the ICAAP process.

Lines of defense for credit risk management

The Bank's risks management setup consists of all management and control layers at the Bank, from the Bank's Board of Directors, management and business units to control functions and Internal Audit. The Risks Management Division (headed by the Bank's CRO) is the overall entity tasked with risks management at the Bank, including credit risk management.

In this regard, and in conformity with Proper Conduct of Banking Business Directive 301, the Bank has specified these three lines of defense:

- **First line of defense – credit-related business lines at the Bank**

  Credit at the Bank involves several key areas, supported by an organizational structure based on divisions and units with specific specializations, with credit extended to customers in various operating segments divided among different divisions (Retail, Business) and within those divisions, among different organizational units. Lines of business management are fully responsible for risks management and for implementing an appropriate control environment for its operations. The professional units in each of these customer segments are responsible for regularly verification, monitoring and control of exposure to customers and operating segments for which they are responsible. This line of defense includes specific control units, such as division controllers, control over customers capital market exposures and other control functions. A set of procedures ensures the actual implementation of policy guidelines.

- **Second line of defense**

  Risk Management

  The Risks Management Division acts as the Bank's independent risks management function, thus serving as the second line of defense within corporate governance for risks management. Division operations and responsibilities regarding credit risk management. The Division operates through multiple independent units:

- Credit risks management and control – post-factum assessment, independent of the Bank's credit approval functions, of the borrower quality and quality of the Bank's credit portfolio, and execution of regular and independent monitoring of the Bank's credit portfolio.
- Analysis – a professional entity tasked with producing an independent opinion for credit to material customers, as part of the credit approval process.
- Risks Management – responsibility for credit risk assessment models.

Financial Information and Reporting Division – Chief Accountant

The Chief Accountant is responsible for appropriate credit classification and for determination of provisions for credit losses.

Legal Division

Responsible for review of implications of statutory provisions and legislative changes for Bank operations and for providing current legal counsel to Bank units, as well as handling lawsuits brought against the Bank.

- **Third line of defense – Internal Audit**

Internal Audit serves as the third line of defense within corporate governance for risks management, conducting audits of credit risk management as part of its annual and multi-annual work plan.

As part of the credit granting process, transaction data is reviewed in accordance with criteria specified by the Bank. The decision making process for granting credit is hierarchical, from branch level to Board of Directors level. Each unit which provides credit monitors on a regular basis credit repayment in accordance with terms agreed as well as the financial status of the customer, based on their level of indebtedness. Any findings requiring action are reported to the relevant credit entity. In addition, as noted above, the credit granting process involves the Analysis Department, which is part of the Bank's risks management function. This involvement includes (with regard to major credit exposures and to economic sectors, as stipulated by the credit policy, in conformity with Proper Conduct of Banking Business Directives of the Bank of Israel) independent analysis of credit applications and presentation of conclusions and recommendations in a written document attached to the credit application and brought for discussion by the appropriate credit committee.

The purpose of the credit approval process is to review and assess the risk associated with extending credit to any customer, primarily verifying that the requested credit is in fact appropriate for customer needs and repayment capacity. This review is conducted both for approval of new credit and for renewal of or changes to existing credit.

The guidelines for the process of review and approval of credit applications, as listed in the Bank's credit policy, refer to any case where new credit approval is requested for a customer or renewal of existing credit or changes to credit composition, collateral, AOC and covenants. The general process for review and approval of credit applications includes the following steps:

- Review of the credit objective and its alignment with the requested credit type.
- Review of customer quality: borrower payment ethic, quality of owners and management. Business scope, sector situation, borrower standing in the sector, profitability, financial stability and repayment capacity of existing liabilities and for repayment terms of the requested credit.
- Review of external information sources, as needed.
- Review of the quality of proposed and required collateral and alignment with the requested credit type.
- Review of existing exposure to the customer and to the borrower group and profitability for the Bank at these levels.
- Specification of business terms and conditions, such as: interest rate, commissions etc. And testing of profitability and returns.
- Summary opinion of the business entity, including summary of credit risk associated with the application and how it is addressed / mitigated with reference to stress scenarios at transaction level and at borrower level.
- Recommendation – approve / reject / set conditions / modify in line with residual credit risk and customer profitability.
- Decision.

Credit risk management tools – risk measurement systems

In general, it is Bank policy to manage and monitor risk using controlled computer systems, with minimum dependence on manual processes and with an update frequency that is as close as possible to real time.

The Bank uses computer systems to manage, locate, control and minimize credit risk. The systems are used, inter alia, as computer-based control tools to locate changes in rating, flag deviations from credit facilities and collateral differences, and locate development in credit risk arising from various other parameters in development and management of the customer account. There are many systems for control of credit management and risks monitoring, which play an important role in credit management, risks management and control processes. These are the key systems used to control credit management and for risks monitoring:

- System for flagging alerts at account level.
- Central system for mortgage management, used to originate and manage residential mortgages and mortgages, including built-in controls over the process.
- System used to locate and flag customers with credit risk characteristics.
- Problematic debt system (HOVAV), used to locate, flag and classify problematic debt, management of provisions for credit losses and accounting, business and legal write-offs at the Bank, and to locate and monitor accounts on the watch list based on criteria specified in the system.
- Information system used to alert to business information of a negative nature, collected by D&B and by BDI, with regard to business customers of the Bank.
- Real Estate system for control and management of closed-assistance projects in the Construction and Real Estate Sector.
- System for recording and monitoring financial covenants applicable to customers.
- Custom system in the trading system, used to manage, locate and control exposure with respect to customers active on the capital market.
- IT control systems for international operations, used for management and monitoring of credit exposure at overseas affiliates.
- Criteria model – for business credit rating system used to rate all debt for a single borrower. The customer credit rating is determined by a process of determination of the business quality of the borrower, which is then combined with the collateral coverage ratio to provide a rating that reflects the quality of credit extended to the borrower.
- The MADHOM model (advanced rating, underwriting and management system) – the key rating model for individual customers and small businesses in the Retail Division. This model is used to assess credit risk and in credit extension processes at branches. Credit authorizations specified for high-risk customers have been set, based on MADHOM ratings, and this data is used for monitoring the retail loan portfolio at the Bank.
- Credit application system for retail customers (corporations, private-business customers and individual customers) in the Retail Division – supporting credit application processes at Bank branches.
- The credit policy form in the credit applications system - for automated reporting of compliance by Corporate Division customers with the guidelines defined in the Bank's Credit Policy.
- Model for determination of differential risk premium – This model was developed by the Bank, based on past empirical data, for rating the individual borrower risk for residential mortgages.

Reports to management and to the Board of Directors

The Bank has specified two limit types for most of these areas. Board of Directors limitation and management limitation, according to the following approach:

Board of Directors' limit – The Board of Directors' limit on risk appetite reflects the maximum exposure allowed by the Bank Board of Directors for all risk areas. The Board of Directors' limit may be modified by the Bank Board of Directors, after discussion of the reasons for the required modification and its implications for the Bank's risk profile, based on developments in business directions of the Bank.

Management limits – Management limits are stricter than the Board limits and are designed to serve as a management tool for close monitoring of credit risk at the Bank and allowing exposures to be reduced even prior to exceeding the risk appetite specified by the Board of Directors. Management limits may be modified by the Bank's Senior Credit Committee, after discussion of the reasons for the required modification and its implications for the Bank's risk profile, based on developments in business directions of the Bank. The Bank regularly monitors compliance with risk appetite limits of the Bank. In case of any deviation from the limits specified by management, the relevant division reports, in conformity with reporting rules specified in the policy, to the various entities. The report includes the reasons for the deviation, implications of the deviation and steps taken, or recommended, in order to remedy the deviation.

Deviation from the Board of Directors limitation is only allowed subject to approval from the Board of Directors or from a Board committee.

Credit quality of credit exposures (CR1) (NIS in millions)

				December 31, 2024
	Gross balances[1]			
	Non-accruing or in arrears 90 days or longer	Others	Provisions for credit losses	Net balances
Debts, except for bonds	4,379	431,382	4,113	431,648
Bonds	-	19,345	-	19,345
Off-balance sheet exposures[2]	72	134,671	245	134,498
Total	4,451	585,398	4,358	585,491
				December 31, 2023
	Gross balances[1]			
	Non-accruing or in arrears 90 days or longer	Others	Provisions for credit losses	Net balances
Debts, except for bonds	3,849	405,903	4,069	405,683
Bonds	-	15,209	-	15,209
Off-balance sheet exposures[2]	121	114,374	201	114,294
Total	3,970	535,486	4,270	535,186

(1) Gross balances in conformity with reported carrying amounts on the financial statements for on- and off-balance sheet items, creating exposure to credit risk pursuant to Proper Conduct of Banking Business Directive 203.

(2) Off-balance sheet exposures are before credit conversion factors (CCF)

Additional disclosure with regard to credit quality of credit exposures (CRB)

Handling of non-performing loans and collection of debts

The handling of problem loans requires specific focus and professionalism, other than the level that approved or processed the credit extended and collateral received. Initial identification is typically computer-based by designated departments for identification and control in the Corporate Division and in the Retail Division. Identified customers are handled by corporate divisions or by the Special Customer Sector of the Corporate Division (first line), as the case may be and as specified in Bank procedures.

In order to identify credit risk materializing, or which may materialize, at the Bank, the Bank regularly conducts a process to review and identify debts, based on specified criteria. Some of these criteria require debt to be classified as problematic debt, while others provide a warning and allow the professional entity to exercise discretion. Debts are reviewed by a ranking of authorizations specified in Bank procedures. This authorization ranking includes individual authorizations, from branch and headquarters staff, to authorizations at higher levels with regard to classifications and provisions. A built-in, independent control process is conducted by regional management and by designated units at headquarters. The Information and Reporting Division forms a second line in the classification and provision setting process; he is responsible, in conformity with Proper Conduct of Banking Business Directive 311, for being the independent factor in charge of classification and setting the provision for credit losses.

A computer system which supports application of measurement and disclosure provisions for non-accruing debts, credit risk and provision for credit losses, including in identification and control processes, carries out logical, criteria-based testing and determines defaults for debts classification as debts under special supervision, inferior debt, non-accruing debt or debt in restructuring, as required.

Identification of residential mortgages (mortgages) with risk attributes is automated by identifying criteria for arrears and other qualitative criteria. In early stages of arrears, the Bank applies automated collection processes. Later on, the Bank applies proactive processes, both internal and external, including legal proceedings, if needed.

Debt in arrears – The state of arrears for debt is determined with reference to the contractual repayment terms. Below are three potential states of arrears:
1. Debt, including principal or interest, not paid by 30 days after the specified payment date, with reference to the original debt terms.
2. Deviation from credit facility approved and reported in checking account.
3. Low turnover – for as long as no amounts were credited to the account to cover the debt within the specified period, even if the debt is within the credit facility.

Identification and classification of non-accruing debt (in lieu of impaired debt)

The Bank has specified procedures for identification of problematic credit and for classification of debt so as to distinguish between problematic debt, including non-accruing debt, and debt in good standing. According to these procedures, the Bank classifies all its problematic debt and off-balance sheet credit items under these classifications: special supervision, inferior or non-accruing. Debt classified as non-accruing debt, where based on current information and events it is expected that the Bank would not be able to collect all amounts due in conformity with contractual terms and conditions of the debt agreement.

For classification and treatment of problematic credit, the Bank distinguishes between the following:

A. Commercial credit with respect to debt with contractual balance over NIS 1 million

Decisions with regard to debt classification and the required provision are made based, inter alia, on the past-due status of the debt, assessment of the borrower's financial standing and repayment capacity, assessment of the primary debt repayment source, existence of collateral and its status, the financial standing of guarantors, if any and their commitment to support the debt and the borrower's capacity to obtain financing from third parties.

In any case, such commercial debt is classified as non-accruing debt when its principal or interest is in arrears for 90 days or longer, unless the debt is well secured and is in collection proceedings, or if the debt has undergone restructuring of problematic debt.

As from the classification date as non-accruing debt, debt is treated as debt not accruing interest income (such debt is known as "non-accruing debt").

B. Credit to individuals, residential mortgages and commercial credit with respect to debt with contractual balance below NIS 1 million

Decision on debt classification is based on the state of arrears of such debt. To this end, the Bank monitors the status of arrear days determined with reference to contractual repayment terms thereof, except for residential mortgages for which - according to the transition provisions - the Bank may continue accruing the arrears in accordance with the extent of arrears method.

Such debt, in arrears 90 days or longer, is classified as inferior debt when the Bank does not discontinue accrual of interest income, except for residential mortgages which are classified as debt not accruing interest income when principal or interest with respect thereto is in arrears 90 days or longer.

Differences between definitions of arrears and default for accounting and supervisory purposes

- Debt is defined to be "in arrears" for accounting purposes after being 30 days in arrears, and for measurement of capital adequacy, "loans in arrears" are so defined after being 90 days in arrears.
- Off-balance sheet credit would be classified as problematic debt if realization of the contingent liability is "possible" and if debts recognized due to realization of the contingent liability may be classified as problematic. Conversely, off-balance sheet credit exposures would be classified as exposures in arrears for capital adequacy purposes consistently with classification of on-balance sheet exposures of the same borrower.

Provision for credit losses – measurement

As from January 1, 2022, the Bank applies generally acceptable accounting practices by US banks with regard to measurement of credit losses from financial instruments, as set forth in topic 326 of the codification (ASC 326) "Financial instruments – credit losses".

As part of the application of this standard, the Bank has put in place procedures for classification of credit and for measurement of provision for credit losses, in order to maintain an appropriate provision to cover expected credit losses with regard to the Bank's loan portfolio. Further, the Bank has put in place procedures to be followed for the measurement of an appropriate provision to cover expected credit losses with regard to bonds held to maturity and the portfolio of bonds available for sale and certain off-balance sheet credit exposures.

The estimated provision for expected credit losses is calculated over the contractual term of the financial asset, taking into account estimated early repayment.

In developing the estimated expected credit losses, the Bank accounted for the effects of past events, current terms and conditions and reasonable forecasts which can be founded about collectability of the financial assets.

In general, calculation of the provision for expected credit losses is estimated on group basis when assets have similar risk attributes. These attributes include the following: (1) Credit score or rating, either internal or external; (2) risk rating or risk classification; (3) type of financial asset; (4) type of collateral; (5) size; (6) borrower's operating sector.

For each group of financial assets with similar risk attributes, the Bank calculates the provision for expected credit losses using one of the methods for measurement of such provision as allowed by the standard, which the Bank expects should result in the best estimate of provisions for credit losses.

In order to estimate expected credit losses over the contractual terms of the assets, the Bank relies on historical information, reviewing the need to adjust such historical information to reflect the extent to which current conditions and reasonable forecasts which can be founded differ from those in the period when the historical information was assessed.

Credit risk(2) by economic sector

As of December 31, 2024

Below are details of credit risk by economic sector (NIS in millions):

	Total credit risk(1)				Off balance sheet debts(2) and credit risk (other than derivatives)(3)						
		Of which:							Credit losses(4)		
	Total	Credit performance rating(4)	Credit in good standing other than at performing credit rating	Problematic(5)	Total	Debts	Problematic(5)	Non-accruing	Expenses with respect to credit losses	Net accounting write-offs	Balance of provision for credit losses
Borrower activity in Israel											
Public – commercial											
Agriculture, forestry and fishing	1,408	1,307	75	26	1,408	1,103	26	20	7	7	32
Mining and excavation	3,189	3,181	-	8	3,054	2,166	8	6	8	-	33
Industry and production	17,241	16,143	549	549	17,049	9,192	545	211	25	(21)	482
Of which: Diamonds	1,608	1,319	49	240	1,608	1,113	240	99	29	-	119
Construction and real estate – construction(6)	64,807	61,746	2,300	761	64,684	31,310	761	483	13	27	382
Construction and real estate – real estate operations	11,712	11,406	130	176	11,293	9,688	176	111	2	-	227
Electricity and water delivery	12,356	12,305	41	10	12,002	7,114	10	7	44	3	129
Commerce	17,514	16,137	641	736	17,383	13,158	736	335	6	74	452
Hotels, dining and food services	2,216	1,958	86	172	2,211	1,681	172	62	1	32	115
Transport and storage	3,757	3,132	551	74	3,728	2,975	74	32	16	15	85
Information and communications	1,820	1,714	89	17	1,717	950	17	12	7	11	26
Financial services	32,901	32,640	225	36	27,168	14,878	36	7	12	11	45
Other business services	8,181	7,651	343	187	8,162	5,187	187	100	16	25	186
Public and community services	3,378	3,166	66	146	3,375	2,575	146	126	(23)	10	80
Total commercial	**180,480**	**172,486**	**5,096**	**2,898**	**173,234**	**101,977**	**2,894**	**1,512**	**134**	**194**	**2,274**
Private individuals – residential mortgages	242,069	236,827	3,101	2,141	242,069	225,291	2,141	2,141	64	-	1,213
Private individuals – other	43,186	42,530	382	274	43,181	27,447	274	83	139	144	697
Total public – activity in Israel	**465,735**	**451,843**	**8,579**	**5,313**	**458,484**	**354,715**	**5,309**	**3,736**	**337**	**338**	**4,184**
Banks in Israel	1,724	1,724	-	-	303	303	-	-	-	-	-
Government of Israel	23,511	23,511	-	-	2	2	-	-	-	-	-
Total activity in Israel	**490,970**	**477,078**	**8,579**	**5,313**	**458,789**	**355,020**	**5,309**	**3,736**	**337**	**338**	**4,184**
Borrower activity overseas											
Total public – activity overseas	10,344	9,723	-	621	10,071	7,379	617	560	181	92	182
Overseas banks	23,812	23,812	-	-	23,674	23,639	-	-	1	-	3
Overseas governments	2,400	2,399	-	1	439	317	1	1	-	-	1
Total activity overseas	**36,556**	**35,934**	**-**	**622**	**34,184**	**31,335**	**618**	**561**	**182**	**92**	**186**
Total	**527,526**	**513,012**	**8,579**	**5,935**	**492,973**	**386,355**	**5,927**	**4,297**	**519**	**430**	**4,370**

(1) On- and off-balance sheet credit risk, including with respect to derivatives (NIS in millions): Debts(2) – 386,355; bonds – 27,593; securities borrowed or acquired in conjunction with resale agreements – 264; (on- and off-balance sheet) credit risk with respect to derivatives – 6,696; and credit risk of off-balance-sheet financial instruments as calculated for the purpose of determining per-borrower indebtedness limits – 106,618.

(2) Loans to the public, loans to governments, deposits with banks and other debts, except for bonds and securities borrowed or acquired in conjunction with resale agreements.

(3) Includes with respect to off-balance sheet credit instruments (included on balance sheet under Other Liabilities).

(4) Credit risk whose credit rating as of the report date matches the credit rating for new credit performance, in conformity with Bank policies.

(5) On- and off-balance sheet credit risk, which is non-accruing, inferior or under special supervision.

(6) Includes on-balance sheet credit risk amounting to NIS 1,019 million and off-balance sheet credit risk amounting to NIS 1,098 million, extended to certain purchase groups which are in the process of construction. For more information on credit exposures secured by international re-insurers, see "Key exposure to foreign countries" below.

Credit risk(2) by economic sector – Continued

As of December 31, 2023

Details of credit risk by economic sector – Continued (NIS in millions):

	Total credit risk(1)				Off balance sheet debts(2) and credit risk (other than derivatives)(3)						
		Of which:							Credit losses(3)		
	Total	Credit performance rating(4)	Credit in good standing other than at performing credit rating	Problematic(5)	Total	Debts	Problematic(5)	Non-accruing	Expenses with respect to credit losses	Net accounting write-offs	Balance of provision for credit losses
Borrower activity in Israel											
Public – commercial											
Agriculture, forestry and fishing	1,137	1,080	31	26	1,137	851	26	21	16	4	32
Mining and excavation	2,356	2,344	-	12	2,265	1,271	10	6	2	-	25
Industry and production	16,540	15,495	475	570	16,291	9,246	558	192	150	14	425
Of which: Diamonds	1,691	1,451	112	128	1,691	1,121	128	67	41	3	74
Construction and real estate – construction(6)	55,771	53,619	1,424	728	55,667	28,380	727	337	83	27	396
Construction and real estate – real estate operations	10,250	8,718	956	576	9,715	8,818	576	105	113	4	225
Electricity and water delivery	11,030	10,591	416	23	10,743	6,514	23	4	17	5	88
Commerce	16,718	15,352	487	879	16,563	12,756	879	288	246	18	520
Hotels, dining and food services	2,121	1,814	116	191	2,107	1,595	191	56	70	19	146
Transport and storage	3,632	2,866	690	76	3,612	2,988	76	31	14	11	84
Information and communications	1,748	1,625	98	25	1,683	944	25	19	11	9	30
Financial services	25,726	25,590	105	31	20,715	9,593	31	28	10	-	55
Other business services	7,647	7,341	111	195	7,644	4,921	195	95	60	27	195
Public and community services	3,269	2,841	268	160	3,238	2,545	160	145	40	15	113
Total commercial	**157,945**	**149,276**	**5,177**	**3,492**	**151,380**	**90,422**	**3,477**	**1,327**	**832**	**153**	**2,334**
Private individuals – residential mortgages	218,658	213,896	2,609	2,153	218,658	206,553	2,153	2,153	247	-	1,149
Private individuals – other	42,032	41,386	369	277	42,028	26,710	277	75	324	134	702
Total public – activity in Israel	**418,635**	**404,558**	**8,155**	**5,922**	**412,066**	**323,685**	**5,907**	**3,555**	**1,403**	**287**	**4,185**
Banks in Israel	2,286	2,286	-	-	702	702	-	-	-	-	-
Government of Israel	19,562	19,562	-	-	4	4	-	-	-	-	-
Total activity in Israel	**440,483**	**426,406**	**8,155**	**5,922**	**412,772**	**324,391**	**5,907**	**3,555**	**1,403**	**287**	**4,185**
Borrower activity overseas											
Total public – activity overseas	8,584	7,946	296	342	8,416	5,730	336	176	58	-	93
Overseas banks	27,248	27,248	-	-	26,997	26,869	-	-	2	-	2
Overseas governments	1,211	1,210	-	1	628	476	1	1	-	-	1
Total activity overseas	**37,043**	**36,404**	**296**	**343**	**36,041**	**33,075**	**337**	**177**	**60**	**-**	**96**
Total	**477,526**	**462,810**	**8,451**	**6,265**	**448,813**	**357,466**	**6,244**	**3,732**	**1,463**	**287**	**4,281**

(1) On- and off-balance sheet credit risk, including with respect to derivatives (NIS in millions): Debts(2) – 357,466; bonds – 22,453; securities borrowed or acquired in conjunction with resale agreements – 106; (on- and off-balance sheet) credit risk with respect to derivatives – 6,154; and credit risk of off-balance-sheet financial instruments as calculated for the purpose of determining per-borrower indebtedness limits – 91,347.

(2) Loans to the public, loans to governments, deposits with banks and other debts, except for bonds and securities borrowed or acquired in conjunction with resale agreements.

(3) Includes with respect to off-balance sheet credit instruments (included on balance sheet under Other Liabilities).

(4) Credit risk whose credit rating as of the report date matches the credit rating for new credit performance, in conformity with Bank policies.

(5) On- and off-balance sheet credit risk, which is non-accruing, inferior or under special supervision.

(6) Includes on-balance sheet credit risk amounting to NIS 1,070 million and off-balance sheet credit risk amounting to NIS 1,211 million, extended to certain purchase groups which are in the process of construction. For more information on credit exposures secured by international re-insurers, see "Key exposure to foreign countries" below.

Credit exposures by remaining term to maturity:

	As of December 31, 2024					
	Up to 1 year	**1-5 years**	**Over five years to 15 years**	**Over 15 years**	**Total credit exposure**	**Average term to maturity**
On-balance sheet credit exposure:					NIS in millions	Years
Commercial	70,987	29,700	7,803	576	109,066	1.5
Private individuals – residential mortgages	23,269	80,740	158,099	113,575	375,683	11.0
Private individuals – other	13,247	12,696	5,813	16	31,772	3.2
Assets with respect to derivatives(1)	3,822	1,111	509	109	5,551	0.8
Total public	**111,325**	**124,247**	**172,224**	**114,276**	**522,072**	**8.4**
Banks and governments	89,197	9,171	12,681	5,064	116,113	1.8
Total credit exposure on balance sheet	**200,522**	**133,418**	**184,905**	**119,340**	**638,185**	**7.2**
Of which: Bonds	6,500	8,917	12,521	5,064	33,002	2.8
Total off-balance sheet credit exposure	**95,258**	**35,741**	**2,319**	**1,219**	**134,537**	**1.5**

	As of December 31, 2023					
	Up to 1 year	**1-5 years**	**Over five years to 15 years**	**Over 15 years**	**Total credit exposure**	**Average term to maturity**
On-balance sheet credit exposure:					NIS in millions	Years
Commercial	62,969	25,781	6,517	319	95,586	1.5
Private individuals – residential mortgages	20,028	73,669	145,664	104,909	344,270	11.0
Private individuals – other	11,873	12,553	5,730	62	30,218	3.2
Assets with respect to derivatives(1)	4,784	959	464	122	6,329	0.7
Total public	**99,654**	**112,962**	**158,375**	**105,412**	**476,403**	**8.5**
Banks and governments	90,101	9,087	12,281	1,172	112,641	1.7
Total credit exposure on balance sheet	**189,755**	**122,049**	**170,656**	**106,584**	**589,044**	**7.2**
Of which: Bonds	8,353	7,697	10,788	1,048	27,886	2.6
Total off-balance sheet credit exposure	**83,039**	**28,060**	**1,265**	**1,177**	**113,541**	**1.7**

(1) Assets with respect to derivative instruments include derivative instruments of banks and governments.

Exposure to foreign countries[1]

Part A – Information regarding total exposure to foreign countries and exposure to countries for which total exposure to each country exceeds 1% of total consolidated assets or 20% of capital, whichever is lower (NIS in millions):

	Balance sheet exposure[4]									Off-balance sheet exposure[4][5][6]			
Country	**Cross-border balance sheet exposure**			**Balance sheet exposure of Bank affiliates in foreign country to local residents**								**Cross-border balance sheet exposure**	
	To governments[4]	**To banks**	**To others**	**Balance sheet exposure before deduction of local liabilities**	**Deduction with respect to local liabilities**	**Net balance sheet exposure after deduction of local liabilities**	**Total balance sheet exposure**	**On-balance sheet problematic credit risk**	**Impaired debts**	**Total off-balance sheet exposure**	**Of which: Off-balance sheet problematic credit risk**	**Maturing in under 1 year**	**Maturing in over 1 year**
December 31, 2024[2]													
USA	1,657	490	4,793	26,306	8	26,298	33,238	53	-	1,901	-	2,189	4,751
Barbados[5]	-	-	4,857	-	-	-	4,857	-	-	-	-	-	4,857
Others[6]	13	318	10,147	3,054	1,400	1,654	12,132	70	-	11,599	-	3,870	6,608
Total exposure to foreign countries	**1,670**	**808**	**19,797**	**29,360**	**1,408**	**27,952**	**50,227**	**123**	**-**	**13,500**	**-**	**6,059**	**16,216**
Of which: Total exposure to LDC counties[7]	13	-	567	-	-	-	580	2	-	110	-	25	555
Of which: To Greece, Portugal, Spain and Italy	-	4	51	-	-	-	54	-	-	12	-	5	50
December 31, 2023[3]													
USA	323	493	3,781	27,884	7	27,877	32,474	58	-	1,976	-	727	3,870
Barbados[5]	-	-	5,353	-	-	-	5,353	-	-	-	-	-	5,353
Others[6]	189	377	9,132	2,799	1,489	1,310	11,008	58	-	11,406	-	3,307	6,391
Total exposure to foreign countries	**512**	**870**	**18,266**	**30,683**	**1,496**	**29,187**	**48,835**	**116**	**-**	**13,382**	**-**	**4,034**	**15,614**
Of which: Total exposure to LDC counties[7]	189	-	655	-	-	-	844	7	-	219	-	21	823
Of which: To Greece, Portugal, Spain and Italy	-	1	62	-	-	-	63	-	-	10	-	3	60

(1) Based on final risk, after effect of guarantees, liquid collateral and credit derivatives.

(2) On- and off-balance sheet credit risk is stated before impact of provision for credit losses, and before impact of deductible collateral with respect to indebtedness of borrower and of borrower group.

(3) Credit risk of off-balance-sheet financial instruments as calculated for the purpose of determining per-borrower indebtedness limits, in conformity with Proper Conduct of Banking Business Directive 313.

(4) The balance of off-balance sheet exposure includes NIS 7,744 million, mostly with respect to acquiring insurance from international reinsurers for the portfolio of housing bonds for borrowers in the real estate sector in Israel. (As of December 31, 2023: NIS 7,075 million).

(5) This exposure is with respect to insurance policies backing the mortgage portfolios in Israel. The insurer, incorporated in Barbados, is a subsidiary of an international insurance group incorporated in Canada.

(6) Balance sheet exposure includes NIS 3,408 million with respect to acquiring insurance from international reinsurers for the loan portfolio to finance land purchase for borrowers in the real estate sector in Israel. (As of December 31, 2023: NIS 3,354 million).

(7) The exposure to LDC countries includes countries defined as less developed, which are the countries classified by the World Bank as lower-middle-income countries.

Part B – Information regarding countries for which total exposure to each country is between 0.75%-1% of total consolidated assets or between 15%-20% of capital, whichever is lower (NIS in millions):

As of December 31, 2024 and December 31, 2023, there are no foreign countries for which the balance sheet exposure exceeds the threshold for this disclosure.

Part C – Information regarding balance sheet exposure to foreign countries facing liquidity issues

	For the year ended December 31	
	2024	**2023**
	Barbados[1]	**Barbados[1]**
Exposure at start of reported period	5,353	5,803
Net changes to exposure	(496)	(450)
Exposure at end of reported period	**4,857**	**5,353**

In conformity with Bank of Israel directives, a country which has received aid from the International Monetary Fund is deemed a country with liquidity issues. The aforementioned exposure is to an insurer that backs mortgage portfolios, and liquidity in the country should not affect the repayment capacity in case of future claims by the Bank.

(1) This exposure is with respect to insurance policies backing the mortgage portfolios in Israel. The insurer, incorporated in Barbados, is a subsidiary of an international insurance group incorporated in Canada.

The exposure presented above represents, in accordance with directives of the Supervisor of Banks, exposure based on final risk. The party bearing the final risk is an individual, business, institution or instrument which provides "credit reinforcement" to the Bank, such as guarantees, collateral, insurance contracts or credit derivatives. When no "credit reinforcement" exists, the party bearing the final risk is the debtor.

Balance sheet exposure to a foreign country includes cross-border balance sheet exposure and balance sheet exposure of affiliates of the banking corporation in foreign country to local residents. Cross-border balance sheet exposure includes balance sheet exposure of Israeli offices of the banking corporation to residents of the foreign country and balance sheet exposure of overseas affiliates of the banking corporation to non-residents of the country where the affiliate is located. Balance sheet exposure of affiliates of the banking corporation in a foreign country to local residents includes balance sheet exposure of affiliates of the banking corporation in that foreign country to local residents, less liabilities of these affiliates (deducted up to the exposure amount).

Credit risk mitigation (CRC)

The Bank Group takes different actions to mitigate risks associated with extending credit and with credit concentration. Below is a description of major tools used to mitigate risk in conjunction with the Bank's credit policies.

Offset of assets and liabilities – The Bank applies the rules specified in the Supervisor of Banks' circular dated December 12, 2012.

In conformity with the directives, a banking corporation should offset assets and liabilities arising from the same counter-party and present their net balance on the balance sheet, when all of the following conditions are fulfilled:

- The banking corporation has an enforceable legal right to offset assets against liabilities with regard to said liabilities.
- The banking corporation intends to repay the liabilities and realize the assets on a net basis or concurrently.
- Both the banking corporation and the counter-party owe each other amounts which may be determined.

According to the directives, a banking corporation should offset assets and liabilities with two different counter-parties and present the net amount on the balance sheet when all of the aforementioned conditions are fulfilled, and provided that the three parties have an agreement which clearly stipulates the banking corporation's set-off rights with regard to those liabilities.

It was further stipulated that a banking corporation should offset deposits whose repayment to the depositor is contingent on the extent of collection of borrowing against those deposits, when the banking corporation has no risk of credit losses.

Currently, it is Bank policy to present exposures with transactions on a gross basis, except for deposits whose repayment to the depositor is contingent on the extent of collection of borrowing, as described above. Accordingly, designated deposits for extending credit, for which repayment to the depositor is contingent upon the collection of the loan (when the Bank Group is not at risk of credit loss) were set off against the loans issued out of these deposits. The interest margins from this activity are presented in the statement of profit and loss under “commissions”.

Collateral – Collateral received by the Bank is designed to secure repayment of credit extended by the Bank to the customer, in case of insolvency. The quality and extent of collateral required from the customer is determined based on the basic borrower attributes, transaction attributes and materiality of the risk of the customer being unable to repay the credit. The higher the risk, the larger and more liquid collateral required by the Bank. In general, customers are required to provide collateral types which match, to the extent possible, the credit extended based on parameters such as: Match with the transaction, amount and credit term.

Bank policies and procedures specify the asset types which may be recognized as collateral for providing credit. The commonly used collateral types at the Bank are: Deposits, securities, liens on real estate, vehicles, credit vouchers, checks, bank guarantees and institutional, corporate or individual guarantees. As part of the collateral policies, rules and principles were prescribed as to the level of reliance on each type of collateral, with regard to its character, marketability, price volatility, promptness of realization and legal status, in addition to assessing the repayment ability of a customer as a criterion for issuing the loans.

There are also other collateral types, such as a floating lien, receivables and/or financial and operating covenants imposed on the customer to secure their capacity to repay their debt to the Bank.

The collateral is matched, as far as possible, to the type of credit that it secures, while taking into account the period of time, types of linkage, character of loans and their purpose, as well as how quickly it can be realized. Collateral coefficients determine the extent to which the Bank is willing to rely on specific collateral to secure credit. The value of the collateral, with the use of safety factors, is, as far as possible, calculated automatically by the IT systems. The safety factors for different types of collateral are examined once a year and approved by the Senior Credit Committee and by the Board of Directors. There is also collateral in place which is not accounted for in calculating safety factors, but only used to reinforce existing collateral. The Bank also approves, on a limited, case-by-case basis, the granting of credit solely on the basis of the borrower’s obligation.

Guarantors – Sometimes, the Bank requires customers to provide guarantees or guarantors to secure credit. There are different types of guarantees, such as personal guarantees, various bank guarantees, State guarantees, insurance policies or letters of indemnification.

Credit syndication – The Bank participates in syndication through a professional department which allows the Bank to lead syndications of significant credit volumes. Syndicated financing allows the risk to be diversified among multiple financing providers in large credit transactions.

Debts sharing / sale – Another tool used to mitigate credit risk is sharing / selling parts of the Bank's credit portfolio in certain segments to financial institutions. In recent years, the Bank has established the business, legal and operational infrastructure for selling of credit risk.

Hedges – Borrowers with currency exposure are offered means of safety and protection (hedging transactions) in order to reduce their exposure, in addition to other measures that the Bank adopts to minimize the risk of the Bank’s exposure from the activities of these customers. The Bank has specified guidelines for the monitoring, control, and supervision of the activities of borrowers whose debts to the Bank are sensitive to exchange rate fluctuations, including the creation of simulations and future scenarios of changes in exchange rates. Special controls are also used for customers, when securities form a significant element of their collateral.

Residential mortgages

Collateral – In accordance with Bank procedures for mortgages, loans are only provided if secured by property collateral. In some cases, the Bank demands guarantors for the debt, in addition to property collateral. For verification of information about the property offered to the Bank as collateral and to determine its value, an assessor visit to the property is normally required, providing a report which describes the property, its location, physical condition and market value. Assessors are party to an agreement with the Bank and act in accordance with Bank guidance, including a structured procedure for conducting assessments, identifying exceptions etc. The common practice for assessment in the mortgage sector is to use an abbreviated assessment. However, the Bank requires an extended assessment for some of the loans for purchase of existing apartments, self-construction or general-purpose loans with high-risk property types, which includes additional tests subject to criteria set for this matter.

Insurance – According to Bank procedures and in conformity with directives of the Bank of Israel, all properties serving as collateral must be insured under property insurance. In addition, the borrowers are insured by life insurance assigned to the Bank in case of death prior to complete repayment of the loan. This credit insurance process is a key risk mitigator.

Loan To Value (LTV) Ratio – The maximum LTV ratio approved by the Bank is determined by the credit policies and is periodically reviewed. Generally, the Bank requires borrowers to contribute part of the financing for the acquisition. This self-equity payment forms a safety cushion in case the property is realized during a down-turn in the real estate market. Furthermore, the rate of the borrower’s participation is a further indication of the borrower's financial stability.

Credit risk mitigation methods (CR3) (NIS in millions)

	As of December 31, 2024								
	Non-secured	Secured							
				Of which: By collateral		Of which: By financial guarantees		Of which: By credit derivatives	
	Total on-balance sheet balance(1)	Total on-balance sheet balance(1)	Of which: Secured amount(2)	Balance sheet balance	Of which: Secured amount	Balance sheet balance	Of which: Secured amount	Balance sheet balance	Of which: Secured amount
Debts, except for bonds	378,950	52,698	17,859	28,445	7,977	24,254	9,882	-	-
Bonds	19,345	-	-	-	-	-	-	-	-
Total	398,295	52,698	17,859	28,445	7,977	24,254	9,882	-	-
Of which: Non-accruing or in arrears 90 days or longer	3,778	601	136	225	38	376	98	-	-

	As of December 31, 2023								
	Non-secured	Secured							
				Of which: By collateral		Of which: By financial guarantees		Of which: By credit derivatives	
	Total on-balance sheet balance(1)	Total on-balance sheet balance(1)	Of which: Secured amount(2)	Balance sheet balance	Of which: Secured amount	Balance sheet balance	Of which: Secured amount	Balance sheet balance	Of which: Secured amount
Debts, except for bonds	355,826	49,857	17,376	27,253	7,462	22,604	9,914	-	-
Bonds	15,209	-	-	-	-	-	-	-	-
Total	**371,036**	**49,857**	**17,376**	**27,253**	**7,462**	**22,604**	**9,914**	**-**	**-**
Of which: Non-accruing or in arrears 90 days or longer	3,159	678	203	187	26	491	177	-	-

(1) Balance sheet balance in conformity with reported carrying amounts on the financial statements, after provisions for credit losses.

(2) Balance sheet balance of part of the debt amount secured by collateral, guarantee or credit derivative, after accounting for safety factors.

Credit risk using the standard approach

Calculation of credit risk using the standard approach is based on external credit ratings assigned by External Credit Assessment Institutions (ECAI).

Ratings from these rating agencies are used to determine the risk weighting of the following exposure groups:

- Sovereigns
- Public sector
- Banking corporations
- Insurance companies, provident funds and mutual funds
- Corporations

The appropriate risk weighting is assigned based on counter-party data.

The risk weighting for banks, public sector entities, insurance companies, provident funds and mutual funds is assigned based on the risk weighting of the country where the bank is incorporated and is one notch lower than the risk weighting for the rating of said country.

For investment in issuances with a specific issue rating, the risk weighting for the debt shall be based on this rating, unless the issuer is a banking corporation or a public sector entity, insurance companies, provident funds and mutual funds. In such cases, the risk weighting would be based on the issuer rating, rather than on the specific issue rating.

For this rating, the Bank used a single rating from S&P. As from the first quarter of 2022, the Bank started using the lower of ratings from S&P and from AM Best, used for rating of credit risk insurers, in order to mitigate credit risk so that the risk weighting is based on insurer rating, rather than on counter-party rating.

The following table maps the ratings by international rating agencies used by the Bank:

S&P	AM Best
AAA to AA-	A++ to A+
A+ to A-	A to A-
BBB+ to BBB-	B++ to B+
BB+ to BB-	B to B-
B+ to B-	C++ to C+
CCC+ or lower	C or lower

Note that the majority of credit risk at the Bank is not rated by an external rating.

Framework analysis and approval

As part of the Bank's business operations, in order to prepare operating frameworks for credit exposure and other risks with regard to foreign banks and financial institutions, the Bank uses public information and ratings and any other information available with regard to financial institutions to which the Bank has exposure, that serve the Bank for analysis and for setting exposure limits.

Standard approach – exposure to credit risk and effects of credit risk mitigation (CR4)

Below is the composition of net credit exposure by risk mitigation type) (NIS in millions)[(1)]:

	As of December 31, 2024					
	Exposures before conversion factors and collateral deduction		Exposures after conversion factors and collateral deduction		Risk assets and density	
	On-balance sheet amount[(2)]	Off-balance sheet amount[(2)]	On-balance sheet amount[(3)]	Off-balance sheet amount[(3)]	Risk assets	Risk asset density
Sovereigns, central banks thereof and national monetary authority	96,312	122	96,633	61	1,458	2%
Public sector entities (PSE) other than central Government	1,669	935	1,780	220	929	46%
Banks (including multilateral development banks)	3,730	2,768	4,440	570	1,776	35%
Securities companies	567	4,740	808	912	860	50%
Corporations	77,599	85,683	80,037	30,849	99,530	90%
Retail exposures to individuals	27,520	16,038	26,145	2,265	21,308	75%
Loans to small businesses	14,197	6,326	12,134	1,198	9,999	75%
Secured by residential property	223,313	16,831	218,253	1,485	118,907	54%
Secured by commercial property	6,042	1,093	5,773	398	6,171	100%
Loans in arrears	3,760	-	3,611	-	4,828	134%
Other assets	7,355	178	7,356	89	4,938	66%
Total	462,064	134,714	456,970	38,047	270,704	55%

	As of December 31, 2023					
	Exposures before conversion factors and collateral deduction		Exposures after conversion factors and collateral deduction		Risk assets and density	
	On-balance sheet amount[(2)]	Off-balance sheet amount[(2)]	On-balance sheet amount[(3)]	Off-balance sheet amount[(3)]	Risk assets	Risk asset density
Sovereigns, central banks thereof and national monetary authority	95,094	152	95,401	76	289	0%
Public sector entities (PSE) other than central Government	1,640	827	1,899	202	384	18%
Banks (including multilateral development banks)	4,070	2,475	4,575	581	1,199	23%
Securities companies	531	5,936	502	1,124	325	20%
Corporations	68,848	70,455	73,081	25,374	87,516	89%
Retail exposures to individuals	26,885	15,679	25,414	2,227	20,731	75%
Loans to small businesses	13,902	6,249	11,821	1,180	9,751	75%
Secured by residential property	204,345	12,069	198,759	1,155	108,647	54%
Secured by commercial property	5,659	485	5,225	127	5,352	100%
Loans in arrears	3,649	-	3,433	-	4,554	133%
Other assets	6,602	155	6,602	77	4,120	62%
Total	431,225	114,482	426,712	32,123	242,868	53%

(1) Balances in this disclosure include on- and off-balance sheet debt balances that reflect credit risk, excluding deferred tax amounts and investments in financial institutions below the discount thresholds (subject to 250% risk weighting), exposures with respect to counter-party credit risk and securitization exposures.

(2) The balances reflect the supervisory exposure amounts, net of provisions and write-offs, before credit conversion factors and before credit risk mitigators.

(3) The balances reflect the supervisory exposure amounts, net of provisions and write-offs, after credit conversion factors and after credit risk mitigation methods.

Standard approach – exposures by asset type and risk weighting (CRS)[(1)(2)] (NIS in millions)

	As of December 31, 2024									
Asset types / risk weighting	**0%**	**20%**	**35%**	**50%**	**60%**	**75%**	**100%**	**150%**	**Other**	**Total credit exposures (after conversion factors and collateral deduction)**
Sovereigns, central banks thereof and national monetary authority	90,241	6,244	-	-	-	-	209	-	-	96,694
Public sector entities (PSE) other than central Government	144	-	-	1,855	-	-	1	-	-	2,000
Banks (including multilateral development banks)	-	2,447	-	2,552	-	-	11	-	-	5,010
Securities companies	-	-	-	1,720	-	-	-	-	-	1,720
Corporations	266	10,563	-	6,193	-	-	92,961	901	2	110,886
Retail exposures to individuals	-	-	-	-	-	28,410	-	-	-	28,410
Loans to small businesses	-	-	-	-	-	13,332	-	-	-	13,332
Secured by residential property	-	-	62,005	52,309	69,305	26,607	9,512	-	-	219,738
Secured by commercial property	-	-	-	-	-	-	6,171	-	-	6,171
Loans in arrears	-	-	-	-	-	-	1,177	2,434	-	3,611
Other assets	2,705	-	-	-	-	-	4,343	397	-	7,445
Of which: with respect to shares	-	-	-	-	-	-	764	62	-	826
Total	93,356	19,254	62,005	64,629	69,305	68,349	114,385	3,732	2	495,017

	As of December 31, 2023									
Asset types / risk weighting	**0%**	**20%**	**35%**	**50%**	**60%**	**75%**	**100%**	**150%**	**Other**	**Total credit exposures (after conversion factors and collateral deduction)**
Sovereigns, central banks thereof and national monetary authority	95,021	209	-	-	-	-	247	-	-	95,477
Public sector entities (PSE) other than central Government	225	1,849	-	24	-	-	3	-	-	2,101
Banks (including multilateral development banks)	-	4,768	-	286	-	-	102	-	-	5,156
Securities companies	-	1,626	-	-	-	-	-	-	-	1,626
Corporations	235	10,759	-	5,773	-	-	80,108	1,580	-	98,455
Retail exposures to individuals	-	-	-	-	-	27,641	-	-	-	27,641
Loans to small businesses	-	-	-	-	-	13,001	-	-	-	13,001
Secured by residential property	-	-	57,392	47,583	58,911	26,423	9,605	-	-	199,914
Secured by commercial property	-	-	-	-	-	-	5,352	-	-	5,352
Loans in arrears	-	-	-	-	-	-	1,192	2,241	-	3,433
Other assets	2,619	-	-	-	-	-	3,941	119	-	6,679
Of which: with respect to shares	-	-	-	-	-	-	428	132	-	560
Total	98,100	19,211	57,392	53,666	58,911	67,065	100,550	3,940	-	458,835

(1) Balances in this disclosure include on- and off-balance sheet debt balances that reflect credit risk, excluding deferred tax amounts and investments in financial institutions below the discount thresholds (subject to 250% risk weighting), exposures with respect to counter-party credit risk and securitization exposures.

(2) The balances reflect the supervisory exposure amounts, net of provisions and write-offs, before credit conversion factors and before credit risk mitigators.

Additional information about credit risk

Risks in the residential mortgage portfolio

In conjunction with credit risk management, the Bank takes various actions to manage, control and mitigate risks associated with provision of residential mortgages. Residential mortgages account for a significant share of all credit risk at the Bank, but this segment is still highly diversified and has a Low-Medium risk level, due to extensive diversification of borrowers from various economic sectors, relatively low LTV ratios, extensive geographic diversification of pledged assets and use of various risk mitigators, including property and life insurance, to mitigate credit risk in this segment. The Bank's policies with regard to mortgages are based on a specific approach, limiting specific risk for each loan by reviewing various risk attributes. These attributes include: review of borrower quality and their capacity to make current repayments even under scenarios involving changes to interest rates, ratio of repayment to regular household income, review of transaction data and LTV ratio. The Bank sometimes requires additional bolstering for the loan, such as guarantors for the loan, proven repayment capacity not based on regular borrower income and other bolstering measures.

As part of its credit risk policies, the Bank has set various restrictions on residential mortgage operations, to account for major risk factors. These factors are reviewed from time to time and additional restrictions are imposed as needed, i.e. based on the actual risk profile of the mortgage portfolio and its trend, as well as on regulatory directives from the Bank of Israel. These restrictions, as a whole, form the Bank's risk appetite for mortgages is defined using multiple risk benchmarks, which evaluate credit risk and concentration risk aspects at regular performance level and the overall portfolio. These benchmarks include: LTV ratio, property location (geographic risk), credit quality benchmarks, loan repayment to income ratio, loan purpose, loan term, loan track mix, property type, document quality, normative interest rate, financial wealth and cross restrictions on combinations of multiple parameters.

The Bank acts regularly to control and manage the risk associated with residential mortgages, for which the Retail Division, the Risks Management Division and other Bank entities are responsible. This activity also includes portfolio analysis and monitoring by key risk factors and estimation of portfolio risk using an advanced model for rating residential mortgages, including rating of each loan and calculation of probability of default and potential loss given default, as well as conducting various stress scenarios to review the effect of changes to macro-economic factors on the portfolio risk level, primarily the impact of change in unemployment, change in housing prices and change in interest rates.

Regular monitoring of the risk profile of the mortgage portfolio and its evolution over time, in view of the specified risk appetite, shows that leading risk benchmarks remain stable and do not indicate material deterioration or change in risk level; however, there is uncertainty with regard to the war’s long-term effects. These benchmarks include: LTV ratios, repayment ratio, rate of obligation in default and, in particular, the rate of arrears for new loans (one year since origination), which is testimony to the high quality of underwriting at the Bank. Note that the average LTV ratio for the Bank's mortgage portfolio (as of the end of December 2024) was 55.1%, compared to 55% on December 31, 2023.

The Bank constantly reviews the risk measures and risk levels, adapting them as required to current business activity, subject to and in line with the risk appetite.

Means for risk management in residential mortgages include:

- Underwriting process – residential mortgages are reviewed and approved by a process which includes the following:
  - Criteria specified in Bank procedures, reflecting the Bank's cumulative interest in residential mortgages. Loan approval criteria include: Nature of the transaction, borrower quality and repayment capacity, property collateral offered, including estimated credit risk in various regions of the country, and the guarantors.
  - Credit authorization – Specification of the party authorized to approve a loan is based on data in the credit application and the risk associated there with.
  - Model for determination of differential risk premium – This model was developed by the Bank, based on past empirical data, for rating the individual borrower risk level.
  - Built-in controls in loan origination system – These controls include: Ensure information completeness; Control over transactions based on authorizations; Work flow process.
- Mortgage-related training – The Bank’s Training Center delivers courses for training, development and improvement of all those involved in provision of residential mortgages.
- Professional conferences – In these conferences, extensive reviews of developments in the mortgage market are presented, along with steps to be taken to handle the risks associated with such developments.
- Regular monitoring of borrower condition and of the residential mortgage portfolio – At the individual loan level, the Bank acts to identify as early as possible any symptoms indicating a decline in borrower repayment capacity, in order to identify as soon as possible any credit failure situation. The Bank applies multiple control types, including regular internal controls at branches, regions and headquarters.

Credit risk in construction and real estate economic sector

Credit operations in this sector account for a significant component of credit operations of the Bank. In financing the construction and real estate industry, specific analysis and monitoring tools are used to assist the Bank in reaching decisions on the granting of financial support to the various projects. Construction financing in this industry is focused mainly on residential construction in areas with strong demand. In addition, the financing is allocated between geographic regions, based inter alia on relevant demand. In extending credit for construction, the Bank focuses on the financial support method (closed assistance). The application of this method is designed to reduce the exposure to risks in the granting of the loans, because it incorporates current and close monitoring of the progress of the financed projects, both before the loans are provided, and as the project receives the financial support, while maintaining a distinction between the financed projects and the business risks inherent in the other activities of the developer-borrower. The Bank is assisted by outside construction supervisors, and also relies on liens on the land in the project, to secure the loans. Loans are issued for financed projects only by business centers and branches with professional knowledge of the subject, and under the supervision of the construction and real estate sector. The Bank also sets policies and rules for financing other real estate transactions, such as financing for rental properties, Construction, purchase groups, urban renewal, National Zoning Plan 38 etc. Moreover, in order to mitigate the risk, the Bank partially insures with overseas reinsurers the portfolio of land designated for construction in a closed project and the portfolio of housing bonds and performance guarantees in financed projects.

In the Real Estate sector, a dedicated control unit implements controls and reviews various aspects with regard to handling of real estate transactions by the Bank, and credit operations are carried out at branches specializing in real estate. The unit also provides control and review with regard to rental real estate and purchase groups.

In the construction and real estate sector, a computer system for control and management of closed-assistance projects in this sector. The system is designed for assistance and monitoring of closed projects, releasing funds, improving control over the real estate portfolio and project maintenance.

In financing the construction and real estate industry, specific analysis and monitoring tools are used to assist the Bank in reaching decisions on the granting of financial support to the various projects.

In the past year, the percentage of sale contracts based on non-linear payment methods out of total sale contracts of new apartments has increased. This issue is assessed on a regular basis as part of the projects' underwriting process and during the monitoring of the projects approved by the Bank, including an assessment of the effects of those contracts on the project's financing costs. In addition, the Bank verifies that the supervisors take into account the scope of the contracts and their effects on financing costs. The project's cash flow and the need to revise the budgetary framework are monitored closely, and the Bank also closely monitors the development of the risk characteristics arising from this segment.

Credit risk data for the construction and real estate customers sector as of December 31, 2024 show that 56.3% of the on-balance sheet credit risk and 71% of the off-balance sheet credit risk is associated with closed financing to real estate projects, mostly for residential construction in areas of strong demand. Most of the off-balance sheet credit is due to housing bonds provided to apartment buyers.

Most of the credit risk in the construction and real estate sector is backed by real estate fully pledged to secure loan repayment. Note that for credit not secured by real estate collateral, there is other collateral in place, such as: deposits, securities etc.

Continued growth in lending to the real estate sector, even in view of competition, is achieved while adhering to appropriate underwriting procedures and credit spreads to reflect the risk and is regularly monitored. The risk level in this sector is also taken into account in the quarterly review process of the group-based provision.

Below is information about credit risk in the construction and real estate economic sector in Israel, by real estate collateral type (NIS in millions):

	December 31, 2024							
	Credit risk to the public[1]							
				Credit risk		Total problematic credit risk	Balance of provision for credit losses	
	On balance sheet[2]		Off balance sheet[3]	Of which:	Non-accruing	Other problematic[4]	On-balance sheet credit risk	Off-balance sheet credit risk
		Guarantees to home buyers[5]	Facilities and other commitments					
Secured by real estate:								
Housing	23,716	6,768	18,193	48,677	342	47	219	24
Commercial and industrial	10,555	200	2,226	12,981	152	118	165	3
Total secured by real estate	**34,271**	**6,968**	**20,419**	**61,658**	**494**	**165**	**384**	**27**
Not secured by real estate	7,263	8	7,590	14,861	100	178	179	19
Total for construction and real estate economic sector in Israel	**41,534**	**6,976**	**28,009**	**76,519**	**594**	**343**	**563**	**46**
Of which: Designated for project assistance	23,400	6,948	17,956	48,304	359	94	44	24

	December 31, 2023							
	Credit risk to the public[1]							
				Credit risk		Total problematic credit risk	Balance of provision for credit losses	
	On balance sheet[2]		Off balance sheet[3]	Of which:	Non-accruing	Other problematic[4]	On-balance sheet credit risk	Off-balance sheet credit risk
		Guarantees to home buyers[5]	Facilities and other commitments					
Secured by real estate:								
Housing	22,158	5,423	13,772	41,353	206	277	211	24
Commercial and industrial	9,713	129	2,525	12,367	128	459	200	3
Total secured by real estate	**31,871**	**5,552**	**16,297**	**53,720**	**334**	**736**	**411**	**27**
Not secured by real estate	5,954	12	6,335	12,301	109	125	164	19
Total for construction and real estate economic sector in Israel	**37,825**	**5,564**	**22,632**	**66,021**	**443**	**861**	**575**	**46**
Of which: Designated for project assistance	21,465	5,516	13,891	40,872	197	318	102	24

(1) On- and off-balance sheet credit risk, problematic credit risk and non-accruing loans to the public are stated before impact of provision for credit losses, and before impact of deductible collateral with respect to indebtedness of borrower.
(2) Loans to the public, investment in bonds by the public, other debt by the public and other assets with respect to derivatives against the public.
(3) Credit risk of off-balance-sheet financial instruments as calculated for the purpose of determining per-borrower indebtedness limits.
(4) On- and off-balance sheet credit risk with respect to the public, which is inferior or under special supervision.
(5) Off-balance sheet credit risk due to housing bonds / similar bonds, which are mostly backed by insurance purchased from international reinsurers.

Below is information about credit risk in the construction and real estate economic sector in Israel, by asset status (NIS in millions):

	December 31					
	2024			2023		
	Credit risk[1]			Credit risk[1]		
	On balance sheet	Off balance sheet	Of which:	On balance sheet	Off balance sheet	Of which:
Secured by real estate						
Real estate yet to be completely constructed:						
Raw land	15,156	1,319	16,475	15,425	1,078	16,503
Real estate under construction	9,992	23,458	33,450	8,364	19,232	27,596
Real estate completely constructed	9,123	2,610	11,733	8,082	1,539	9,621
Total credit secured by real estate in Israel	**34,271**	**27,387**	**61,658**	**31,871**	**21,849**	**53,720**
Not secured by real estate	7,263	7,598	14,861	5,954	6,347	12,301
Total credit risk for construction and real estate	**41,534**	**34,985**	**76,519**	**37,825**	**28,196**	**66,021**

(1) On- and off-balance sheet credit risk, problematic credit risk and non-accruing loans to the public are stated before impact of provision for credit losses, and before impact of deductible collateral with respect to indebtedness of borrower.

Credit risk to individuals

The individual customer segment is highly diversified – by number of customers and by geographic location. Most customers in this segment are salaried employees with an individual account or joint household account. A recession in non-banking operations is a major risk factor for household activity and higher unemployment may increase the number of customers who face difficulties.

Credit policies and work procedures with regard to extending credit, including to individual customers, include directives and guidelines with regard to credit underwriting and adapting credit to customer needs and repayment capacity: Review of credit objective, requested LTV, loan term, analysis of customer's repayment capacity and repayment sources, for all of their indebtedness. This includes review of various economic parameters of the customer based, inter alia, on the customer's regular income, pledged or unencumbered savings, knowledge of the customer and past experience working with the customer. There are also procedures, designated work processes and controls for proactive offering of loans to individual customers, in conformity with Bank of Israel directives.

As for credit to individual customers, Bank policy is in conformity with the Supervisor of Banks' Proper Conduct of Banking Business Directive 311A regarding "Management of consumer credit".

The Bank regularly monitors the risk level in the credit portfolio for individuals using, inter alia, the internal credit rating model for individual customers, as well as through continuous monitoring and analysis of expenses with respect credit losses.

Loans to small businesses

The micro and small business segment is highly diversified in terms of customers in various economic sectors, mostly in small industry, trade, business and financial services. Financing in the micro and small business segment is mostly provided for short terms, for current operations and for financing of working capital, covering gaps in cash flow, financing trade receivables, inventory and import activities. Such financing is provided against appropriate collateral, such as checks for collateral / checks receivable, invoices, pledging of contracts and current liens, and against external collateral if possible, such as deposits, real estate and owner's guarantees.

As part of the credit underwriting process, the Bank analyzes the merchant's business activity, including by comparison to their economic sector. In this regard, and subject to review of repayment capacity and repayment sources, the credit amount and type are customized for the customer needs.

Major risk factors in operations of the small business segment are: macro-economic deterioration which would result in recession, which would have across-the-board impact on businesses operating in this segment; dependence on key persons in the business (primarily owners and managers); dependence on individual suppliers / customers who may face default. The Bank regularly monitors the risk level in the credit portfolio for micro and small businesses, including through custom credit rating models and by monitoring high-risk economic sectors and setting guidelines and differential credit authorizations for different management levels. In order to optimally support these operations, the Bank acts to improve infrastructure, banking processes and credit underwriting processes.

Credit for medium and large businesses

The medium business segment operates across all economic sectors, primarily industry, solar energy, commerce and services, construction and real estate.

Loans to medium businesses are typically highly diversified across customers, economic sectors and by geography. Financing is provided to this segment for current operations through financing of working capital, including financing of trade receivables and inventory, which is typically short-term financing, expansion and investment in the firm, which is typically medium- and long-term financing. This financing is backed by most existing collateral types, such as: deposits, securities, equipment, vehicles, current liens, various guarantees and personal guarantees. In addition, financial covenants are used for these customers, in order to mitigate risk.

Loans to large business customers is typically less diversified than in other segments. These customers typically have complex financial activities and diverse financing sources, both from the banking system in Israel and overseas, from institutional investors and from the capital market. Collateral for such loans is typically general collateral, such as a current lien, negative pledge along with financial covenants. These customers are involved with various credit products, including credit for the capital market.

The control functions of the Corporate Division are responsible for identification, assessment, measurement, monitoring, mitigation and reporting of risk inherent in products, activities, processes and systems under their responsibility, as well as for management of IT control systems and for maintaining an appropriate control environment with regard to risk management in the Division (hereinafter: "Control").

The control functions in the Corporate Division are responsible as follows:

- Division Control – responsible for control over credit extended to segments handled by the Division.
- Business credit control is responsible for control from multiple aspects:
    - Control over credit extended to Corporate Division customers. The division controller is also responsible for coordinating the Watch List Forum, to discuss accounts with risk characteristics, based on pre-determined parameters.
    - Responsible for use of computer mechanisms to flag accounts and customers, including based on information external to the Bank. The Department is responsible for control over business activity in accounts flagged due to risk indications, including for elaborating any deviations with the relevant front line credit staff (centers, sectors) and monitoring the elimination of such deviations.
- The Capital Market Exposure Control Unit – operations involving derivatives requires specific specialization and real-time control. This is due to the special nature of such activities and the exposure arising there from. The unit is responsible for control over customers specified in advance by the Corporate Division or by the various credit committees, for compliance with covenants and facilities.
- Compliance control – providing a professional response and training to Corporate Division staff with regard to compliance provisions and applying controls regarding compliance.

The Bank constantly monitors the risk level in the business credit portfolio using, inter alia, the Bank's criteria rating system. This system rates all debt of a single borrower to the Bank. The customer credit rating is determined by a process of determination of the business quality of the borrower, which is then combined with the collateral coverage ratio to provide a rating that reflects the quality of credit extended to the borrower.

Capital market

Credit risk in the capital market is the risk of the borrower failing to meet their obligations towards the Bank, including the obligation to cover losses due to capital market activity conducted through the Bank.
Debt may arise from failure or loss from transactions made in the customer's trading activity on the capital market, through the Bank.
Major exposures to trading activity on the capital market include exposure with respect to credit transactions, short selling and exposure with respect to transactions involving derivatives through the Bank.

There are three major risk factors associated with customer activity on the capital market through the Bank:

- Credit risk for the Bank, arising from customer transactions or from the customer portfolio composition, which may result in exposures which the customer is unable to cover.
- Concentration risk, arising from over exposure to a borrower / borrower group or to certain types of activities.
- Operational risk which, should they materialize, may impact credit risk.

Exposure frameworks for capital market trading activity are approved in conformity with the credit authorization ranking at the Bank.

The Bank provides its customers with a range of facilities for trading activity on the capital market (credit against securities, facility for short selling securities, facility for exposure to derivatives). These exposures are backed by monetary collateral and/or by securities.

Customers engaged in speculative trading – The Bank allows exposure by customers engaged in speculative trading, only if they are experienced and have proven specialization in this area, based on controlled activity and receiving appropriate collateral. The capital market exposure unit closely monitors the activity and exposure of such Bank customers, including on aggregate.

In conformity with Proper Conduct of Banking Business Directive 330 concerning management of customer trading activity on the capital market, the Bank has specified an aggregate exposure limit for capital market customers, including an aggregate exposure limit for customers with significant speculative activity, as well as limit on activity in the capital market for a single customer. The exposure to credit risk inherent in trading activity of customers on the capital market, vs. the risk appetite, is reported on quarterly basis to management and to the Board of Directors.

Commercial credit

The bank manages its commercial credit operations in multiple segments. The division into credit operating segments is supported by the Bank's organizational structure.

The decision making process with regard to extending commercial credit acts to minimize risk. To this end, an authorization hierarchy is set for officers and credit committees at various levels, up to the Board of Directors' Credit Committee and the Board of Directors. The authorizations specify and limit the approving entity by credit volume, outstanding credit volume, collateral received, determination of the quality and value of collateral, as well as authorization to set interest rates.

The credit volume applicable for the authorization ranking is determined based on the aggregate credit volume for all components of the borrower group of which the borrower is part, not just for the individual borrower.

Branch managers and other officers in the business departments have authorization with regard to extending credit. More material credit-granting decisions are mostly made by credit committees in order to minimize the risk in relying on the judgment of a single individual.

The authorization procedures list the exposure amount that each of the credit extending entities and various credit committees is authorized to approve, subject to other Bank procedures with regard to extending credit.

Moreover, an authorization ranking has been specified with regard to approval of collateral to be received, authorization to determine the diversification, quality of collateral and authorization to determine the value of collateral.

Counter-party credit risk

Qualitative disclosure of counter-party credit risk (CCRA)

The Bank defines counter-party risk as in Proper Conduct of Banking Business Directive 203A – as credit risk arising from transactions involving derivative financial instruments. As from July 1, 2022, data with regard to counter-party risk is calculated using the SACCR approach.

Counter-party credit risk (CCR) is the risk that the counter-party to a transaction will be in default before final clearance of the transaction cash flows, including receipts with respect to any counter-party obligation. Economic loss would be incurred only when the transaction with the counter-party would have a positive economic value upon such default. Counter-party risk may be affected by other risks, including: credit risk, market risk, liquidity risk, operating risk and reputation risk of the counter-party to the transaction. Counter-party risk has been defined as a material risk at the Bank. The Risk Manager is the Manager, Finance Division.

The Bank has set specific policies on addressing counter-party risk for financial institutions and sovereigns and another document, which is part of the Bank's credit policies, concerns customer activities in financial derivatives. The trading in derivatives is part of the Bank's management of assets and liabilities, and is subject to restrictions prescribed by the Board of Directors. The Bank trades in these derivatives, both for its customers and for its own account, as part of the management of basis and interest exposure in the various linkage segments. Various procedures ensure that the Bank may offer to customers a wide range of financial instruments – while maintaining an appropriate framework for addressing such risk.

Exposure to financial institutions and foreign countries involves multiple risk factors, including country risk with regard to economic standing, geo-political standing and transfer risk, arising from administrative restrictions on transfer of foreign currency. In these operations, the Bank's risk appetite, as included in the policy document, involves routing most of the proactive operations to developed nations rated A or higher and to major financial institutions in these countries. Operations are carried out while maintaining proper diversification of exposures to sovereigns and financial institutions. The Bank has very little business with less developed nations rated lower, primarily in response to customer needs.

Risk measurement is based on stress tests which are conducted regularly in view of specific restrictions imposed on activity with the counter-party as well as on aggregate, with restrictions on total portfolio exposure. In cases where a market price may not be quoted, pricing and exposure estimation are based on commonly used pricing models. For business with financial institutions and sovereigns, the Bank has developed a methodology for calculating facilities with each counter-party, based on the quality, rating and capital of such financial institutions and sovereigns.

In order to estimate exposure, the Bank uses diverse systems, as in its business operations, with control based on information available in these systems and on a special control system developed by the Bank to estimate customer exposure and to alert any deviations. The control mechanism for operations with foreign financial institutions relies on special reports created in the Bank's infrastructure system and exception reports generated to monitor business in Israel and overseas, including a Financial Institutions Report, which lists all exposures to banks as well as deviation reports, which reflect deviations from agreed facilities, if any. There are also automated mechanisms designed to flag deviations from trading limits with financial institutions and sovereigns, both in the trading room and in trading room control.

The Bank regularly adjusts its exposure to financial institutions and countries and regularly reviews publications about ratings of financial institutions to which the Bank is exposed, through the Financial Institution Relations Department of the Finance Division. Other indicators based on market benchmarks are regularly reviewed to alert any events which may indicate change in the financial standing of major financial institutions to which the Bank is exposed.

The Bank's current risk profile indicates that most of the Bank's exposure to counter-party risk is to foreign corporations and financial institutions, with a non-material exposure level. The Bank also has low exposure to sovereigns.

The Bank regularly reviews and monitors the action required to mitigate this risk.

Restrictions and controls – The Bank has operations involving financial derivatives, mostly vis-à-vis customers, which are required to maintain capital adequacy or to maintain collateral based on scenarios. These operations are regularly monitored by the Bank on intra-day basis by a dedicated control system developed by the Bank. The Bank has relatively little activity vis-à-vis customers who are mostly engaged in trading financial derivatives and short-selling or with customers who are not subject to capital requirements or collateral. These customers are closely monitored at a higher frequency than other customers.

At the Bank, a limit restriction applies for financial institutions and sovereigns, including reference to derivatives. Furthermore, a restriction applies to customer facilities based on certain parameters. The Corporate Division includes a dedicated department, specialized in control of exposure arising from capital market operations, which daily reviews customers active in this field. Trading room operations are also controlled, including testing of compliance with various restrictions prescribed by the Board of Directors and Executive Management.

Risk mitigation - in order to participate in capital market activity, customers are required to provide collateral in accordance with Bank procedures. In its activities vis-à-vis financial institutions and sovereigns, the Bank signs ISDA agreements and CSA annexes. This allows for setting off transactions, so that the amount exchanged between parties to the transaction is limited to the net exposure amount, thereby reducing exposure of either party. CSA addendums regulate funds transfer between parties to a transaction whenever exposure reaches a certain pre-defined level, thereby reducing counter-party exposure.
In conformity with directives of the Supervisor of Banks (Appendix C to Directive 203), the Stock Exchange clearinghouse and the MAOF clearinghouse are classified as qualified central counter-parties for calculation of capital requirements with respect to exposure to central counter-parties. Moreover, in conformity with the Europe Market Infrastructure Regulation (EMIR) legislation, the Bank operates through a central clearinghouse, LCH Ltd. In transactions settled in this way (whether mandatory or voluntary), Bank exposure is to LCH, rather than to the original counter party. Moreover, LCH delivers all payments and margin funds between counter parties to the transaction through leading financial institutions, authorized to conduct clearing transactions with LCH ("Clearing Members"). The Bank uses two Clearing Members for these operations.

Analysis of exposure to counter-party credit risk (CCR) based on the supervisory approach (CCR1) (NIS in millions)

	As of December 31, 2024				
	Subrogation cost	**Future potential exposure**	**Alpha used to calculate regulatory EAD**	**Exposure after deduction of collateral**	**Risk assets**
Standard approach for counter-party risk (SA-CCR) (for derivatives)	945	5,316	1.4	8,766	3,876
Comprehensive approach to credit risk mitigation (for securities financing transactions)	-	-		294	200
Total	**7,258**	**5,316**		**9,059**	**4,076**

	As of December 31, 2023				
	Subrogation cost	**Future potential exposure**	**Alpha used to calculate regulatory EAD**	**Exposure after deduction of collateral**	**Risk assets**
Standard approach for counter-party risk (SA-CCR) (for derivatives)	1,160	4,493	1.4	7,914	2,457
Comprehensive approach to credit risk mitigation (for securities financing transactions)	-	-		121	99
Total	**1,160**	**4,493**		**8,035**	**2,556**

Capital allocation with respect to credit risk valuation adjustment (CVA) (CCR2) (NIS in millions)

	As of December 31, 2024		**As of December 31, 2023**	
	Exposure after deduction of collateral	**Risk assets**	**Exposure after deduction of collateral**	**Risk assets**
Total – portfolios for which CVA is calculated using the standard approach	8,766	1,421	7,914	1,282

Standard approach – exposures to counter-party credit risk (CCR) by supervisory portfolio and risk weightings (CCR3) (NIS in millions)

	As of December 31, 2024				
Supervisory portfolio / risk weighting	**0%**	**20%**	**50%**	**100%**	**Total credit exposure**
Sovereigns	-	25	-	-	25
Public sector entities (PSE) other than central Government	-	-	30	-	30
Banks (including multilateral development banks)	-	3,033	201	-	3,234
Securities companies	-	-	4,680	-	4,680
Corporations	-	-	1	784	785
Supervisory retail portfolios	-	-	-	12	12
Other assets	-	-	-	-	-
Total	-	3,058	4,912	796	8,766

	As of December 31, 2023				
Supervisory portfolio / risk weighting	**0%**	**20%**	**50%**	**100%**	**Total credit exposure**
Sovereigns	37	-	-	-	37
Public sector entities (PSE) other than central Government	-	17	-	-	17
Banks (including multilateral development banks)	-	3,613	-	-	3,613
Securities companies	-	3,161	-	-	3,161
Corporations	-	-	2	1,066	1,068
Supervisory retail portfolios	-	-	-	18	18
Other assets	-	-	-	-	-
Total	37	6,791	2	1,084	7,914

Composition of collateral with respect to exposure to counter-party credit risk[1] (CCR) (5CCR) (NIS in millions)

	As of December 31, 2024					
	Collateral used in derivatives transactions				Collateral used in securities financing transactions	
	Fair value of collateral received		Fair value of collateral deposited			
	Disconnected	Not disconnected	Disconnected	Not disconnected	Fair value of collateral received	Fair value of collateral deposited
Cash – local currency	-	2,031	-	34	5,486	-
Cash – other currency	-	1,586	-	576	4	-
Domestic sovereign debt	-	370	-	-	1	-
Other sovereign debt	-	4	-	-	-	-
Debt of Government agency	-	-	-	-	-	-
Corporate bonds	-	17	-	-	24	-
Shares	-	714	-	-	4,006	-
Other collateral	-	-	-	-	-	-
Total	**-**	**4,722**	**-**	**610**	**9,521**	**-**

	As of December 31, 2023					
	Collateral used in derivatives transactions				Collateral used in securities financing transactions	
	Fair value of collateral received		Fair value of collateral deposited			
	Disconnected	Not disconnected	Disconnected	Not disconnected	Fair value of collateral received	Fair value of collateral deposited
Cash – local currency	-	1,711	-	108	2,032	-
Cash – other currency	-	1,418	-	1,244	6	-
Domestic sovereign debt	-	509	-	-	13	-
Other sovereign debt	-	178	-	-	-	-
Debt of Government agency	-	-	-	-	-	-
Corporate bonds	-	292	-	-	30	-
Shares	-	1,738	-	-	215	-
Other collateral	-	-	-	-	-	-
Total	**-**	**5,846**	**-**	**1,352**	**2,296**	**-**

(1) Amounts refer to collateral deposited or received with respect to exposures arising from counter-party credit risk related to transactions in derivatives or to securities financing transactions, including transactions settled by a Central Counter-Party (CCP)

Exposures to credit derivatives (CCR6) (NIS in millions)

	December 31, 2024	
	Protection acquired	Protection sold
Stated amounts		
Single-name credit default swaps	-	-
Credit options	2	-
Other credit derivatives	-	-
Total – stated amounts	2	-
Fair value – values		
Positive fair value (asset)	15	-
Negative fair value (liability)	-	-

	December 31, 2023	
	Protection acquired	Protection sold
Stated amounts		
Single-name credit default swaps	-	-
Credit options	3	-
Other credit derivatives	45	45
Total – stated amounts	48	45
Fair value – values		
Positive fair value (asset)	14	-
Negative fair value (liability)	(2)	-

Exposures to central counter parties (CCR8) (NIS in millions)

	As of December 31, 2024	
	Exposure after deduction of collateral	Risk assets
Exposures to qualified central counter-party (total)	1,331	38
Exposures to transactions with QCCP (excluding initial collateral and transfers to risk reserve), of which:	1,036	38
OTC derivatives	-	-
Transactions in derivatives traded on the stock exchange	611	12
Initial non-disconnected collateral	-	-
Funded transfers to risk reserve	295	-
Unfunded transfers to risk reserve	-	-

	As of December 31, 2023	
	Exposure after deduction of collateral	Risk assets
Exposures to qualified central counter-party (total)	1,393	49
Exposures to transactions with QCCP (excluding initial collateral and transfers to risk reserve), of which:	1,135	49
OTC derivatives	-	-
Transactions in derivatives traded on the stock exchange	701	14
Initial non-disconnected collateral	-	-
Funded transfers to risk reserve	259	-
Unfunded transfers to risk reserve	-	-

Market risk

General information about market and interest risk

Market risk – This is the risk of loss from on– and off-balance sheet positions, arising from change in fair value of financial instruments, due to change in market risk factors (interest rates, exchange rates, inflation, prices of equities and commodities).

Description of market risks to which the Bank is exposed:

1. Interest risk is the risk to Bank profit (change to revenues) or to Bank capital due to changes to interest rates. Interest risk consists of four major risk factors:
   A. Repricing risk – This risk is due to timing differences in term to maturity (fixed interest) and in repricing dates (variable interest) of assets, liabilities and off-balance sheet positions. Mismatch of repricing dates may expose Bank profit and the value of Bank assets to unexpected fluctuations due to changes to interest rates.
   B. Yield curve risk – This risk arises from unexpected shifting of the yield curve. Changes to links between interest rates for different terms are reflected in a change in curve slope (steepness) or shape (twist) and negatively impact the Bank's profit or economic valuation.
   C. Basis risk – Risk arising from imperfect correlation in changes to interest rates in different financial markets, or in different instruments with similar repricing features. Differences in changes to interest rates may result in changes to cash flows and revenue spread between assets, liabilities and off-balance sheet instruments with a similar term to maturity, which are seemingly hedged.
   D. Optionality risk – This risk is inherent in cash flows where the behavioral maturity differs from the contractual one. The risk arises from change in timing or extent of cash flow, due to changes in macro-economic conditions (such as changes to market interest rates). This risk is inherent in options embedded in the asset portfolio (such as early mortgage repayment), liability portfolio (such as deposit withdrawal at exit points) and in off-balance sheet instruments. These options entitle the customer to buy / sell or modify the financial instrument.
2. Exchange rate / inflation risk – This is the risk to Bank profit, arising from fluctuations in exchange rates / in the Consumer Price Index (due to currency mis-match between assets and liabilities).
3. Position risk in shares – This is the risk to Bank profit, arising from impairment of investment in shares.

The Bank has no exposure to commodities and its exposure to equities is not material, hence its main exposure to market risk is due to basis risk and to interest risk.

Strategies, policies and processes

The policy document for management of market and interest risks stipulates the principles whereby the Bank should act in order to identify, measure, monitor, review and control the market risk and interest risk on a regular basis, both in the normal course of business and in times of stress. Policy principles were specified in line with Bank strategy and with regulatory requirements, i.e. Proper Banking Conduct Directives of the Bank of Israel, relevant Basel Committee directives and in line with globally accepted best practice.

Market risk and interest risk are managed at Group level, including the Bank's overseas affiliates and subsidiaries, divided into two major risk concentrations:

- Bank portfolio – This portfolio, which is the Bank's primary activity and risk, consists of all transactions not included in the trading portfolio, including financial derivatives used to hedge the bank portfolio. This portfolio is exposed to interest and inflation risk. The measure of exposure which the Bank wishes to retain is due to the Bank's business activity. This exposure is limited by the risk appetite, specified individually for market risk and interest risk in the bank portfolio, which is reviewed by the Bank using various tools and models. Any deviation from or even getting close to the specified exposure limits are regularly reported and immediately addressed, in conformity with principles specified in the policy document created by the Bank. Management of this risk is designed to maintain a risk level in conformity with the risk appetite specified, while taking advantage of opportunities and constant monitoring of the risk profile, so that the Bank would not be exposed to significant losses.
- trading portfolio – The portfolio consists of positions in financial instruments held for trade or for hedging of other components in the trading portfolio. The consolidated portfolio includes portfolios managed by the trading room and portfolios of bonds held for trade and strategy in Israeli currency and in foreign currency – as well as derivatives designated for execution of strategies. The portfolio also includes hedging transactions for instruments included in the trading portfolio. The risk associated with this portfolio is Low.

The Bank of Israel directives relevant for market and interest risk management are: Proper Conduct of Banking Business Directive 339 "Market Risks Management"; Proper Conduct of Banking Business Directive 333 "Interest Risk Management", which expands the regulations with regard to interest risk, mostly with regard to Bank activity in the bank portfolio, which was revised lately and will come into effect in July 2025; and Proper Conduct of Banking Business Directive 208 "Capital Measurement and Adequacy", with regard to definition of revaluation management and capital allocation under Pillar 1 with respect to the trading portfolio.

The Bank is required to allocate capital with respect to interest risk and equities in the trading portfolio, for exchange rate risk for all banking activities and for options risk. The Bank uses the effective duration method in measuring interest risk, and the Delta Plus method in measuring options risk. This method quantifies the risk associated with operations of the options portfolio based on the discounting values. These reflect the sensitivity of the options portfolio to movements in the underlying asset and in standard deviation.

The Bank's exposure to equities is low; the Bank has a limited equity portfolio in the nostro portfolio and in the real investments portfolio. Bank operations in the trading portfolio, as noted above, are subject to restrictions which reflect low risk appetite and therefore, the Bank's capital allocation with respect to market risk is very low.

The structure of the Bank's assets and liabilities portfolio, which is weighted towards the mortgage portfolio, produces medium-term uses for which the Bank requires sources. Due to incomplete alignment of the average duration of uses and the average duration of sources, the Bank's economic value is exposed to changes in interest rate curves.

The market and interest risk profile is monitored weekly by the Finance Division and the Risks Management Division; on a weekly level by the Risks Management Committee, headed by the Manager, Finance Division; and on a monthly level by the Management Committee for the Management of Assets and Liabilities, headed by the Bank President & CEO. The market and interest risk profile in the bank portfolio is presented to the Bank’s Board of Directors using the Bank's quarterly Risks Document. The discussion by the Board of Directors covers development of the risk profile, major action taken by the Bank in the different portfolios during the reviewed period and of market developments, in particular risks in markets in Israel and overseas which may potentially impact the business profile of Bank operations and its market and interest risk profile in the bank portfolio and Bank sensitivity to changes in risk factors.

Tools for risk measurement management

Measurement of market and interest risks is supported by a wide range of information systems, models, processes, risk benchmarks and stress tests. The models and information systems involved in the calculation are regularly reviewed, through internal controls processes at the Bank, including continuous validation processes.

Market risk in both portfolios (bank and trading) are managed overall by using the VAR model and stress tests. The Bank operates within the Board of Directors’ specified risk appetite for and interest market risk in terms of VAR and stress tests.

The risk appetite stipulates that the VAR for all of the Bank’s activities in one-month investments, will not exceed 9% of shareholders’ equity, and that the maximum loss in stress tests, the highest of all calculation methods, will not exceed 14.5% of equity. Management has also specified guidelines for these two restrictions. The Bank maintains a risk profile that is within these restrictions. For application of these models, the Bank's available capital is defined as a non-linked NIS-denominated source.

The VAR model is a statistical model that estimates the loss expected for the Bank in a certain investment period and at a predetermined statistical level of assurance. This model measures risk level in terms of money, where the Bank aligns the investment horizon for the portfolios reviewed using this benchmark.

Stress testing – These are various methods designed to estimate the Bank’s expected loss as a result of sharp fluctuations in prices of market risks factors. This model estimates, using different methods, the potential loss at the left tail of the distribution, i.e. beyond the significance level determined in calculating the VAR. The methods used in the Bank’s stress scenario rely, among other things, on past stress events and scenarios as well as on scenarios stipulated by the Bank of Israel in the new Directive 333 for interest risk management, where the yield curve shifts along the curve in parallel at rates of up to 4%.

For more information about approaches to interest risk management, how this risk is managed and risk mitigators, see chapter "Management of interest risk in the bank portfolio" below.

Restrictions of models used by the Bank to manage market and interest risk

The main models used by the Bank to estimate market and interest risk, as with all models, have restrictions which may be due to model assumptions, input values used or mismatch between the models and market conditions, in particular with regard to stress conditions. The Bank is aware of these restrictions and therefore backs these models with other tools and processes. The VAR model is not appropriate for use under stress conditions, since it relies on historical data, which may not incorporate an estimate of the potential for an extreme market event. Use of stress tests, which are mostly "forward-looking", i.e. do not rely on historical data, and review the risk under stress scenarios, completes the VAR model.

The risk benchmarks measure the change in overall value of the Bank (both the VAR benchmark and stress scenarios, and the EVE benchmark under the various scenarios), estimate risk under a static, rigid assumption of stable, one-time change across the life of all existing assets and liabilities at the Bank at the measurement point, without any management intervention to take any hedging action / make any changes to exposures. Addressing these assumptions means, first and foremost, understanding and disclosing the meaning of risk values across all management levels, and making business decisions given this assumption. Furthermore, to complement the economic capital approach, the Bank estimates the effect of interest risk using the earnings method as well, over a shorter term, and as part of management of the Bank's financing work plans.

another limitation is the use of behavioral models to create forecasted cash flows of instruments which include such components. The Bank, where the balance sheet consists of a significant portion of residential mortgages, significantly relies on behavioral models, for both attribution of future mortgage cash flows and for anticipated attribution of current account and deposit balances, with an option for early withdrawal by the customer.

The Bank faces these limits both in continuous validation processes of models used by the Bank, which consider all model components, and in regular execution of sensitivity testing to the outcome of risk value estimation under various behavioral assumptions, including a complete collapse of such assumptions.

Exposures to linkage segments

Currency exposures – It is Bank policy to maintain minimal (operating) currency positions, except for specific strategic positions approved by the different committees and/or ForEx positions in the trading portfolio, managed by the Trading Room and/or the Nostro Unit, subject to relatively low exposure limits specified. Foreign currency strategic positions are capped by a Stop Loss mechanism to restrict and reduce risk. The Bank's overall currency risk level is low.

Inflationary exposures – The Bank has inherent exposure to negative inflation due to Bank activity in the bank portfolio, including excess CPI-linked mortgages over CPI-linked sources. The risk management policy is in line with expected profit from holding a position and the Bank's capacity to reduce the exposure within a reasonable time frame, subject to the specified risk appetite. The actual exposure is also measured as part of the risk appetite benchmarks and models applied by the Bank to all market risks. Risk is assessed as Low-Medium, reflecting the exposure and expected inflation.

Policy on determination whether a position is designated for trading

The Bank operates in conformity with Proper Conduct of Banking Business Directive 208, which incorporates the Basel Committee directives with regard to definitions, management and revaluation of the trading portfolio. Inclusion of an instrument and/or position in the trading portfolio is subject to compliance with objective criteria (free of any treaty which restricts their negotiability or which may be fully hedged) and subjective criteria set forth in the regulation, i.e. there is trading intent or hedging of other components in the trading portfolio, active portfolio management and frequent, accurate valuation of the portfolio.

Classification under the trading portfolio is part of Bank policy, and the trading portfolio primarily consists of all portfolios managed by the Trading Room (bond trading portfolio of the Interest Trade Unit (market maker), in the Bank's nostro units, derivative transactions classified under Trading Room portfolios (and options), as well as trading portfolios of bonds held for trading and strategy in Israeli and foreign currency, managed by the Asset Management Department, as well as derivatives used for executing strategies. The portfolio also includes hedging transactions for instruments included in the trading portfolio. The trading portfolio is exposed, inter alia, to the following risk factors: Foreign exchange exposures, interest exposures and options-related exposures.

In general, all derivatives transactions are conducted by the Trading Room, with external counter-parties and are classified under the trading portfolio when contracted. The transactions classified to the bank portfolio are specific transactions which, prior to conducting them, a decision was made and documented to conduct them for the bank portfolio.

Organizational structure of market and interest risk management function

The Bank has put in place an organizational structure for management of market risks and interest risks in the bank portfolio, which includes the Board of Directors, management and the three lines of defense. This structure is supported by special committees and forums, created for such risks management and in order to create an internal controls system, designed to prevent deviation from Bank policy in its activity in the trading portfolio and in the bank portfolio.

Upon any unusual occurrence in the capital market, such as an unexpected change in interest rates, fluctuations in the foreign currency markets, changes in fiscal and/or monetary policies, the special committees and forums created by the Bank for such situations, convene for a special discussion in order to reach the decisions required by these occurrences.

Below is the organizational structure created at the Bank for management and control of market and interest risk:

Bank Board of Directors – The Bank Board of Directors approves, at least once per year, the policy documents which stipulate the management of exposures to market and interest risks in the Bank's portfolio. The policy on management of market and interest risks, management of the bond portfolio and the specific policy on derivatives risk and OTC transactions, after discussion and approval by the Risk Management Committees of the Finance Division, the Risk Monitoring Forum headed by the CRO, by Bank management and by the Board of Director's Risk Management Committee. The documents outline, inter alia, the authority ranking for market risks management, the risk appetite (exposure restrictions) and the frequency of discussions and reporting of exposure status at different levels. The risk appetite framework specified by the Board of Directors was broadened by management guidelines (restrictions), set lower than the Board of Directors restrictions, in order to allow exposure to be reduced even before it deviates from the risk appetite specified by the Board of Directors. The risk appetite is specified under normal and stress conditions, by a range of benchmarks which restrict market risk; in addition, specific risk appetite benchmarks were specified with respect to interest risk in the bank portfolio and with respect to Bank activity in the trading portfolio. The Board of Directors restrictions and management guidelines reflect the risk appetite, which is consistent with the Bank's overall risk appetite, business strategy, liquidity planning, financing sources and capital planning at the Bank.

The Bank maintains interfaces vis-à-vis subsidiaries with regard to setting risk appetite for the Group. Reports by Group entities about the risk profile in view of the risk appetite are presented in the Bank's quarterly Risks Document.

The Bank President & CEO – heads the Asset and Liability Management Committee (ALMC), which is the advisory entity to the President & CEO with regard to market and interest risks. This committee generally meets once a month, or more frequently, when special developments in the various markets occur or are forecast. The Bank President & CEO is responsible for setting policy and guidelines for exposure, subject to exposure limits approved by the Board of Directors. This includes making business decisions with regard to management of market and interest exposures, approval of proactive exposure strategies, hedging and risk mitigation moves and new products for management of market and interest risk under the management approval track.

First line of defense – Lines of business management

The head of the Finance Division (CFO) manages all financial risk at the Bank, including market and interest risk. The internal Risks Management Committee serves as the advisory body for the Division Manager. The committee convenes weekly to discuss current aspects of the management of assets and liabilities. This committee is also attended by representatives of the Risks Management Division.

The Manager, Finance Division specifies guidelines for current operations of market and interest risks management, subject to restrictions specified by the Board of Directors and by management.

When a financial event is identified and declared, which requires special preparation, the Manager, Finance Division convenes – with approval of the President & CEO, a special forum to discuss and make decisions on how to handle the event. The operation of this forum is incorporated in a specific procedure.

Second line of defense – Risks Management Function

The Manager, Risks Management Division (the Chief Risks Officer – CRO) is responsible for the overall Risk Owner framework. The Risks Monitoring Forum for market, interest and liquidity risks, serves as the advisory body to the Chief Risks Officer with regard to management of Bank exposure to market and interest risks in the bank portfolio, which is convened at least once every two months. The Forum, including inter alia representatives from the Financial division and from the Risks Management Division, regularly monitors the market and interest risk profile of both the Bank portfolio and the trading portfolio, including individual activity in the trading room, as well as the outcomes of stress scenarios and back-testing. They also discuss and approve methodologies for risk management and control, including measurement methods which could support portfolio monitoring operations, addressing the various aspects of risk management and control for market and interest risk, including conclusions derived from validation processes of the relevant models, conducted by the Risks Management Division. Control and monitoring of market and interest exposures is handled in the second line of defense by: Financial Risks Management Unit of the Risks Management Division.

Third line of defense – Internal Audit

Internal Audit serves as the third line of defense within corporate governance for risks management at the Bank, conducting regular control to review and assess the effectiveness of internal controls at the Bank, in accordance with the multi-annual work plan of the Internal Audit Division.

Scope and nature of reporting and measurement systems

Measurement of market and interest risks is supported by information systems, models, processes, risk benchmarks and stress scenarios. The information systems involved in the calculation are regularly reviewed, through internal controls processes at the Bank and continuous validation processes. A system is in place for control over market risk and interest risk. The system is used to calculate risk benchmarks and to review these vs. risk limits. Calculations are based on a central database of market and position data. The system is also used for calculation of capital allocation with respect to market risks and credit risks. Risk owners also use other systems, both to calculate the risk benchmarks and as complementary systems for development and maintenance of calculations, ad-hoc analysis and risks management models. The Middle Office uses a custom system to monitor and control trading room activity; this system operates in real time to monitor and locate any unusual activity. This system allows for complete documentation of the activity with high-level analysis capabilities and trends with regard to risk and profitability, as well as a system for call analysis which generates alerts based on business laws.

Market risk using the standard approach

Below are capital requirement components under the standard approach for market risk (NIS in millions):

	Risk assets as of:	
	December 31, 2024	**December 31, 2023**
Direct products		
Interest rate risk (general and specific)	1,492	1,345
Position risk in shares (general and specific)	44	35
Foreign currency risk	122	544
Commodities risk	-	-
Options	-	-
Delta Plus approach	17	33
Securitization	-	-
Total	1,675	1,957

Exposure in the trading portfolio is low, and mostly due to interest risk.

Additional information about market risk

Financial derivatives

Operations involving financial derivatives are conducted in the trading room, both for trading portfolios managed in the trading room and for various customers, including for the financial management sector, to hedge exposures in the bank portfolio. Operations involving financial derivatives pose a range of risks, primarily the following: Market risks, managed as part of market and interest risk management in the trading portfolio and in the bank portfolio, operational risk and compliance risk, managed under the overall management framework of operational risk and compliance risk, including administrative enforcement and counter-party credit risk. Counter-party credit risk vs. different entities is managed in conformity with Bank policy on counter-party credit risk management, as set forth above in chapter "Counter-party credit risk" and in chapter "Credit" with regard to the capital market segment.

Management of positions in trading portfolio

The trading portfolio mostly consists, as noted above, of portfolios managed by the trading room, subject to exposure limits by various risk benchmarks based, inter alia, on scenarios involving changes to risk factors. Risk is measured during the trading day and at the end of the trading day. Risk is managed by the trading room and is constantly monitored, intra-day and daily, by the Trading Room Control Department and projects in the Finance Division. Monitoring and control processes are also conducted by the Financial Risks Management Unit of the Risks Management Division.

The Bank operates a committee for management of operational risk in the trading room, which discusses bi-monthly the operations of the trading room, compliance with risk limits, measuring profit vs. risk, unusual events and so forth. Reports of this activity are also presented to management's Asset and Liability Management Committee and in the quarterly Risks Document discussed by the Board of Directors.

Developments in market risk

Risk values in the different benchmarks (analysis of interest risk in Bank portfolio) indicate exposure in economic fair value to higher interest rates, due to the position structure composed of uses for medium and long terms vs. sources for short to medium terms. Risk values were affected both by current mortgage performance and deposit operations, as well as proactively conducting transactions involving derivatives and activity in the bond portfolio.

The Bank is preparing to apply Proper Conduct of Banking Business Directive 333 "Interest risk in the banking portfolio", which will come into effect in July 2025.

Interest risk in bank portfolio and in trading portfolio

Targets and objectives in management of interest risk in the bank portfolio

Definition of interest risk in the bank portfolio for the purpose of risk control and measurement

As noted above, the bank portfolio constitutes most of the activity which generates interest risk for the Bank.

Management of interest risk in the bank portfolio and risk mitigation strategies

Management of interest risk is in conformity with Proper Conduct of Banking Business Directive 333. The directive requires the Bank to measure risk by several measurement methods (but one primary method may be chosen for regular management purposes), the measurement systems are required to support measurement of interest risk in the entire portfolio, as well as separately in the bank portfolio and in the trading portfolio. The directive requires banks to apply a range of scenarios to estimate risk, but also defines a "standard shock scenario", where exceptional results of such scenario must be immediate reported to the Supervisor of Banks.

Interest risk is managed using two approaches: the earnings approach and the economic value approach. The Bank has specified the economic value approach to be the key method for risk management – but has developed another model, based on the earnings approach. It is noted that the Bank early adopted the new provisions of Directive 333 with regard to measurement of the interest risk using the economic value approach.

The EVE (Economic Value of Equity) model is the Bank's main model for estimating interest risk in the bank portfolio. The EVE model reviews the effect of changes to interest rate curves on the economic value of the bank portfolio, the trading portfolio and the overall portfolio (negotiable + bank), under various assumptions with regard to changes in interest rate curves (by operating segment, such as: derivatives, deposits and mortgages, by linkage basis). Assumptions about changes to the interest rate curve under normal and stress situations, including corresponding upwards/downwards shifts of the interest rate curve at high rates and scenarios involving steeper, flatter and a brief shock to interest rate curves.

Earnings approach – calculation of a financing margin, i.e. the difference between (cumulative) interest revenues received across all uses and (cumulative) interest expenses paid across all sources. The financing margin model allows the Bank to review expected earnings under different operating assumptions (turnover under different balances, for both assets and liabilities, changes in interest rate curves, assuming operations in conformity with work plans), including sensitivity analysis to changes in various interest rate curves.

The calculation is made by advanced computer systems developed by the Bank, at the individual transaction level. This model serves as a decision support system for Risk Managers at the Bank.

The earnings approach is applied at two levels: static and dynamic. At the static level – calculation of net financing revenues for the Bank at a certain point in time. At the dynamic level – calculation of financing revenues under different interest operating scenarios for the coming year.

A major tool for management and mitigation of interest risk is setting fund transfer pricing at the Bank (FTP). Fund transfer prices (FTP) are determined daily at the Bank by the Asset and Liability Management Department of the Financial Management Sector and reflect the needs for management of various exposures under the policy on risk / reward management.

Another tool is buying / selling government bonds. The Asset and Liability Management Department of the Financial Management Sector also manages the interest and/or basis position through forward contracts, swap transactions and options. The advantages of using these tools stem from the ability of rapid execution at large amounts, which allows the Bank to "move positions" within a reasonable time frame for asset and liability management. In addition, these transactions are unfunded, are highly liquid and are conducted through the Bank's trading room.

Interest risk benchmarks in the bank portfolio and stress scenarios

The economic value of the different portfolios is calculated as the present value of cash flows from Bank assets (exposed to changes in interest rates), net of the present value of cash flows from Bank liabilities (exposed to changes in interest rates). The change in economic value due to changes in interest rate curves (the EVE benchmark) is calculated as the difference between future cash flows of asset and liabilities discounted at current interest rates, and the difference discounted at expected interest rates under interest rate scenarios. Future forecasting of financial instruments is made in conformity with generally accepted practice around the world for calculating fair value.

Description of model assumptions

As noted above, the model actually used to measure interest risk at the Bank is the EVE model, based on the Bank's portfolio only. In addition, the Bank consolidated the EVE measurement method with a calculation method of a table representing the "impact of scenarios of changes in interest rates on net adjusted fair value" in line with the new guidance under Directive 333.

Hedging against interest risk in the bank portfolio

Derivatives transactions, which are identified as hedging balance sheet positions in accordance with accounting rules, are to be specified as hedge accounting transactions, in accordance with the Bank's hedging procedure. Hedge effectiveness is the degree of correlation between changes in fair value or between cash flows of the hedged item and of the hedging derivative. The hedge is considered highly effective if the changes in fair value or cash flows of the hedged item, are nearly fully set off by changes in fair value or cash flows of the hedging instrument. Hedge effectiveness is tested quarterly.

Derivatives in the bank portfolio used for economic hedging of balance sheet activity, or which cannot be defined as an accounting hedge, impact accounting profit and loss. The gap derives from difference in accounting treatment between balance sheet items and derivatives other than accounting hedges. This effect is regularly monitored and managed subject to guidelines specified by management, by the Financial Management Sector and is reported and discussed by various risk management committees.

At least once a year, the Bank reviews the underlying assumptions of models used to manage market and interest risks, including behavioral assumptions made in order to determine forecasting of certain instruments. The sensitivity of risk values to changes in behavioral assumptions are reviewed regularly.

Description of key assumptions in various models and parameters used for calculation

Calculation of net fair value of financial instruments:

- Fair value was calculated based on estimates with regard to the possibility of early repayment, based on statistical / empirical analysis.
- The early repayment assumptions in mortgages are based on empirical testing and on a borrower behavior model with regard to early repayment rate out of all mortgages. These assumptions are verified from time to time against actual early repayment, in each linkage segment and interest type, separately short and long original loan terms.
- Early repayment assumptions for deposits and savings plans with early withdrawal options (bearing fixed or variable interest, CPI-linked or non-linked), where interest terms are known in advance, are based on empirical analysis and are reviewed and revised from time to time.
- Checking account balances are attributed using a statistical model which reflects their nature as a stable source.

Change in interest revenues, net:

- This calculation reviews annual financing profitability (12 months ahead) under a scenario of change to risk-free interest rate and assuming re-financing of all balances maturing up to 12 months ahead.
- Assumptions for creating future cash flows in this model: Attribution refers to all Bank activity (on-balance sheet, derivatives and investment of excess liquidity) for a one-year horizon, based on behavioral options for early mortgage repayment, early withdrawal of deposits and attribution of credit balances in checking accounts. The change in revenues also includes an estimate for the early repayment commission.

Analysis of interest risk in bank portfolio

Below is the effect[(1)] of a parallel shift of the curve by 2% on the economic value of the Bank's portfolio in EVE terms (NIS in millions):

	December 31, 2024					
	Change in fair value					
	Israeli currency		Foreign currency			
	Non-linked	Linked to CPI	USD	EUR	Other	Total
2% increase	(2,169)	(1,557)	(84)	66	29	(3,727)
2% decrease	1,948	1,560	(185)	(70)	(29)	(284)
	December 31, 2023					
2% increase	(1,766)	(2,393)	608	10	22	(3,519)
2% decrease	2,182	2,774	(605)	19	(24)	4,346

(1) Calculated based on current data used for actual interest risk management.

In preparing the mortgage repayment cash flows forecast for the Bank, assumptions with regard to the prepayment rate and manner are taken into account. Credit balances in checking accounts are attributed in line with common practice in conformity with the Basel directives, i.e. over an average term of 4-5 years for different customer types.

Below is the VAR for the Bank Group (NIS in millions):

	2024	2023
At end of period	1,487	1,666
Maximum value during period	(Feb.) 1,734	2,522 (November)
Minimum value during period	(Sep.) 1,409	(Jan.) 875

Back-testing of the historical-analytical VAR model in the overall portfolio resulted in several gain/loss observations that exceed the VAR model forecast, created by a sharp increase in interest rate curves and sharp market fluctuations due to the war. These exceptions do not disqualify the VAR model.

Quantitative information about interest risk in bank portfolio and in trading portfolio

Net adjusted fair value[1] of financial instruments of the Bank and subsidiaries thereof (NIS in millions):

	As of December 31, 2024				
			Foreign currency		
	NIS – Non-linked	**NIS – CPI-linked**	**USD**	**Other**	**Total**
Financial assets(2)	324,929	90,837	44,583	9,670	470,019
Other amounts receivable with respect to financial derivatives, complex and off-balance sheet financial instruments	281,379	5,771	264,576	27,369	579,095
Financial liabilities(2)	(307,012)	(58,127)	(64,434)	(13,554)	(443,127)
Other amounts payable with respect to financial derivatives, complex and off-balance sheet financial instruments	(303,067)	(7,256)	(244,360)	(24,009)	(578,692)
Net fair value of financial instruments	(3,771)	31,225	365	(524)	27,295
Effect of liabilities with respect to employee rights	(747)	(1,203)	(5)	-	(1,955)
Effect of attribution of on-call deposits to terms	4,674	-	357	237	5,268
Adjusted net fair value	156	30,022	717	(287)	30,608
Of which: Banking portfolio	(2,574)	24,535	1,733	(2,819)	20,875
Of which: Effect of early repayment of residential mortgages	728	(963)	(10)	(30)	(275)
Of which: Impact of early receptions of public deposits	(52)	75	-	-	23

	As of December 31, 2023				
			Foreign currency		
	NIS – Non-linked	**NIS – CPI-linked**	**USD**	**Other**	**Total**
Financial assets(2)	295,208	83,866	42,904	8,391	430,369
Other amounts receivable with respect to financial derivatives, complex and off-balance sheet financial instruments	223,726	4,276	227,019	22,344	477,365
Financial liabilities(2)	(283,244)	(50,662)	(61,594)	(10,192)	(405,692)
Other amounts payable with respect to financial derivatives, complex and off-balance sheet financial instruments	(243,664)	(6,169)	(207,750)	(20,867)	(478,450)
Net fair value of financial instruments	(7,974)	31,311	579	(324)	23,592
Effect of liabilities with respect to employee rights	(691)	(1,159)	-	-	(1,850)
Effect of attribution of on-call deposits to terms	(3)4,053	-	424	349	4,826
Adjusted net fair value	(3)(4,612)	30,152	1,003	25	26,568
Of which: Banking portfolio	(3)(8,350)	26,612	297	(624)	17,935
Of which: Effect of early repayment of residential mortgages	972	33	1	(22)	984
Of which: Impact of early receptions of public deposits	(145)	80	-	-	(65)

See footnotes in the next page.

Impact of change scenarios in interest rates on net adjusted fair value[1] of the Bank and its subsidiaries (NIS in millions):

	As of December 31, 2024					As of December 31, 2023				
			Foreign currency					Foreign currency		
	NIS – Non-linked	NIS – CPI-linked	USD	Other	Total	NIS – Non-linked	NIS – CPI-linked	USD	Other	Total
Concurrent changes										
Concurrent 1% increase	(1,274)	(720)	(134)	5	(2,123)	(849)	(1,023)	216	74	(1,582)
Of which: Banking portfolio	(1,267)	(705)	(119)	4	(2,087)	(865)	(998)	224	71	(1,568)
Of which: Effect of attribution of on-call deposits to terms	1,459	-	188	125	1,772	1,148	-	172	142	1,462
Of which: Effect of early repayment of residential mortgages	1,684	1,053	1	3	2,741	1,341	918	-	2	2,261
Of which: Impact of early receptions of public deposits	(107)	(76)	-	-	(183)	(152)	(89)	-	-	(241)
Concurrent 1% decrease	944	595	(177)	(4)	1,358	631	870	(317)	(76)	1,108
Of which: Banking portfolio	934	580	(193)	(2)	1,319	646	844	(326)	(74)	1,090
Of which: Effect of attribution of on-call deposits to terms	(1,563)	-	(200)	(133)	(1,896)	(1,234)	-	(183)	(151)	(1,568)
Of which: Effect of early repayment of residential mortgages	(2,072)	(1,285)	(1)	(3)	(3,361)	(1,647)	(1,124)	-	(3)	(2,774)
Of which: Impact of early receptions of public deposits	112	85	-	-	197	159	99	-	-	258
Non-concurrent changes										
Steepening(4)	(916)	(20)	69	(13)	(880)	(955)	(398)	81	11	(1,261)
Of which: Banking portfolio	(914)	(20)	63	(13)	(884)	(906)	(259)	81	11	(1,073)
Flattening(5)	566	(162)	12	3	419	713	66	34	1	814
Of which: Banking portfolio	563	(160)	20	3	426	681	(19)	34	2	698
Short-term interest increase	7	(276)	179	(6)	(96)	224	(467)	255	31	43
Of which: Banking portfolio	1	(271)	186	(6)	(90)	228	(428)	254	31	85
Short-term interest decrease	14	341	(183)	7	179	(161)	516	(261)	(33)	61
Of which: Banking portfolio	20	336	(191)	6	171	(166)	477	(260)	(32)	19
Maximum	(1,274)	(720)	(183)	(13)	(2,123)	(955)	(1,023)	(317)	(76)	(1,582)
Of which: Banking portfolio	(1,267)	(705)	(193)	(13)	(2,087)	(906)	(998)	(326)	(74)	(1,568)

(1) Net fair value of financial instruments, except for non-monetary items, after effect of liability with respect to employee rights and attribution of on-call deposits to the terms.

(2) Excludes balance sheet balances of financial derivatives, fair value of off-balance sheet financial instruments and fair value of complex financial instruments. After effect of attribution of on-call deposits to terms.

(3) Reclassified, technical amendment.

(4) Short-term interest decrease and long-term interest increase.

(5) Short-term interest increase and long-term interest decrease.

The difference between exposure of the bank portfolio to changes in interest according to net adjusted fair value and sensitivity of economic value (EVE) presented above arises from timing differences only.

This calculation allows for scenarios which may result in negative interest rates and does not cap interest rates at 0%.

See Note 33 to the financial statements for additional information.

Note that the internal rate of return and the average effective duration, as presented under Bank exposure to changes in interest rates on the Risks Report, are average data and therefore it is not possible to make deductions based on a linear change thereto with regard to sensitivity of net adjusted fair value to changes in interest rates.

Below is impact of change scenarios in interest rates on net interest revenues and non-interest financing revenues[1] [4] (NIS in millions):

	As of December 31, 2024			As of December 31, 2023		
	Interest revenues	**Non-interest financing revenues[3]**	**Total**	**Interest revenues**	**Non-interest financing revenues[3][5]**	**Total**
Concurrent changes[2]						
Concurrent 1% increase	(39)	297	258	64	105	169
Of which: Banking portfolio	(40)	315	275	56	79	135
Concurrent 1% decrease	(444)	(142)	(586)	(866)	(491)	(1,357)
Of which: Banking portfolio	(442)	(164)	(606)	(857)	(469)	(1,326)
Maximum	(444)	(142)	(586)	(866)	(491)	(1,357)
Of which: Banking portfolio	(442)	(164)	(606)	(857)	(469)	(1,326)

(1) For a one-year term.
(2) Changes to risk-free interest.
(3) Includes the effect of fair value, gain (loss) from transactions in bonds and the effect of interest accrual for transactions in derivatives.
(4) An interest increase/decrease scenario features is an assumption of the purchase/sale of bonds as well as the diversion of checking accounts to deposits. The decline in the Bank portfolio's sensitivity to decline in interest rates in this year arises both from operating activities and from revision to the behavioral assumptions regarding rates of diversion from interest-bearing deposits to current accounts.
(5) Reclassified due to improvement of the effect of hedging derivatives in the sensitivity measurement model.

Below are the key assumptions underlying the above data, which are in line with how the Bank manages interest risk:

- Credit balances in checking accounts are attributed in line with common practice in conformity with the Basel directives, i.e. over an average term of 4-5 years for different customer types.
- When calculating sensitivity of interest revenues, the risk-free interest rate is not capped at a minimum of 0%. In the same way, no cap is applied to the discount rate at 0% when calculating non-interest financing revenues.
- It was assumed that under a scenario of rising interest rates, funds would be diverted from current account balances to interest-bearing deposits and/or changes to bonds in the nostro portfolio. On the other hand, under a scenario of declining interest rates, it is expected that funds would be diverted from interest-bearing deposits to current accounts.

The decline in the Bank portfolio's sensitivity to decline in interest rates in this year arises both from operating activities and from revision to the behavioral assumptions regarding rates of diversion from interest-bearing deposits to current accounts.

For further details of assumptions used in calculation of the fair value of financial instruments, see Note 33 to the financial statements.

Additional information about interest risk

Exposure of the Bank and its subsidiaries to changes in interest rates

Reported amounts (NIS in millions)

	As of December 31, 2024					
	On Call to 1 month	Over 1 month to 3 months	Over 3 months to 1 year	Over 1 year to 3 years	Over 3 years to 5 years	Over 5 years to 10 years
Financial assets[1]	248,217	21,352	45,522	76,551	36,179	27,266
Other amounts receivable[2]	164,876	158,038	159,731	35,296	41,353	16,337
Financial liabilities	222,800	31,378	83,884	49,775	27,415	21,857
Other amounts payable[2]	164,594	158,220	160,019	35,419	41,518	16,634
Exposure to interest rate fluctuations	25,699	(10,208)	(38,650)	26,653	8,599	5,112
Additional details on exposure to changes in interest rates						
A. By nature of activity:						
Exposure in bank portfolio	23,283	(10,298)	(43,809)	25,055	8,482	4,901
Exposure in trading portfolio	2,416	90	5,159	1,598	117	211
B. By linkage basis:						
Israeli currency – non-linked	23,615	(16,127)	(39,843)	12,543	7,651	3,804
Israeli currency – linked to the CPI	(4,566)	3,091	11,862	14,982	640	348
Foreign currency [4]	6,650	2,828	(10,669)	(872)	308	960
C. Effect on exposure to interest rate fluctuations						
Effect of liabilities with respect to employee rights	(15)	(21)	(102)	(244)	(201)	(427)
Effect of attribution of on-call deposits to terms	41,765	(1,959)	(4,982)	(8,877)	(7,387)	(12,744)
Effect of early repayment of residential mortgages	899	1,702	6,665	8,617	440	(469)
Effect of early repayment of deposits from the public	(535)	(952)	(2,267)	(62)	2,873	749

Specific remarks:

(1) Excludes balance sheet balances of financial derivatives, fair value of off-balance sheet financial instruments and fair value of complex financial instruments. After effect of attribution of on-call deposits to terms.
(2) Amounts receivable and payable with respect to financial derivatives, complex and off-balance sheet financial instruments, after effect of employee rights liabilities.
(3) Weighted average by fair value of average effective duration.
(4) Includes Israeli currency linked to foreign currency.
(5) Difference between effective average duration of financial assets and effective average duration of financial liabilities.
(6) Reclassified, technical amendment.

General remarks:

- In this table, data by term represents the present value of future cash flows from each financial instrument, discounted using the interest rate which discounts them to the fair value consistent with assumptions according to which fair value was calculated for the financial instruments in Note 33 to the financial statements.
- Internal rate of return is the interest rate which discounts the expected cash flows from a financial instrument to its fair value recognized under Note 33 to the financial statements.
- Average effective duration of a group of financial instruments is an approximation of the change, in percent, in fair value of the group of financial instruments which would be caused by a minor change (0.1% increase) in the internal rate of return of each of the financial instruments.

Certain transactions conducted by the Bank constitute complex financial instruments, which include embedded derivatives not detached, in accordance with Public Reporting Directives. These transactions include, inter alia, loans with exit points, deposits bearing graduated interest rates with withdrawal dates, credit and deposits with guaranteed minimum and deposits with optional linkage. The Bank reflects the interest rate risk with respect to these instruments in a reasonable manner, by spreading maturities of the cash flows in accordance with contract dates, and with various assumptions based on past experience.

							As of December 31, 2023		
	Over 10 years to 20 years	Over 20 years	Without maturity	Total fair value	Internal rate of return	Average effective duration(3)	Total fair value	Internal rate of return	Average effective duration(3)
					In %	in years		In %	in years
	12,755	1,522	655	470,019	4.57	1.53	430,369	4.35	1.49
	3,032	432	-	579,095		0.79	477,365		0.78
	782	(34)	2	437,859	3.14	0.97	(6)400,866	3.24	0.92
	3,454	789	-	580,647		0.92	480,300		0.87
	11,551	1,199	653	30,608			26,568		
	11,478	1,130	653	20,875		0.20	(6)17,935		0.21
	73	69	-	9,733		2.10	8,633		3.61
	7,225	652	636	156		(5)0.23	(6)(4,612)		(5)0.20
	3,496	169	-	30,022		(5)0.88	30,152		(5)1.48
	830	378	17	430		(5)-	1,028		(5)(0.03)
	(574)	(371)	-	(1,955)	2.61	11.64	(1,850)	2.36	11.14
	(548)	-	-	5,268	(2.74)	1.32	(6)4,826	(3.06)	1.16
	(12,616)	(5,513)	-	(275)	0.07	(1.35)	984	0.08	(1.24)
	217	-	-	23	(0.28)	0.12	(65)	(0.01)	(0.27)

Shares

Policy on holding shares in the bank portfolio

Bank policy with regard to investment in shares is to realize the current portfolio and individually review any new investments. Shares in which the Bank invested were acquired for the purpose of earning capital gains, and are presented at fair value in the available-for-sale security portfolio and under investment in associated companies, where the Bank has a material investment in such entity.

Holdings with expected capital gain and holdings purchased for other purposes

Investments in non-banking corporations are managed by the Finance Division. The steering committee for investments in non-banking corporations convenes quarterly and advises Bank management on investments in non-banking corporations. The steering committee is responsible for management and maintenance of the existing portfolio, trying to improve it so as to allow for rational realization of this portfolio within a reasonable time frame but with no specified schedule, in order to allow for maximum returns.

Accounting treatment

About 28% of investments in shares by the Bank are negotiable and presented at their market value. The remainder of these investments are presented at cost or at their carrying amount. In case of impairment of a non-temporary nature, in accordance with management's assessment, a provision for impairment of the investment is recorded as a loss in the Bank's accounts.

For more information about equity investments in the bank portfolio, see chapter "Major investees" on the Report by the Board of Directors and Management and Note 12 to the financial statements.

Below is information about the composition of equity investments in the bank portfolio (NIS in millions):

	December 31, 2024		December 31, 2023	
	Fair value	Capital requirement(1)	Fair value	Capital requirement(1)
Shares	633	75	563	54
Venture capital / private equity funds	529	58	297	25
Total investment in shares in bank portfolio	**1,162**	**132**	**860**	**79**

(1) The capital requirement was calculated at 12.50%.

Liquidity risk

Liquidity risk – risk due to uncertainty about resource availability and the capacity to realize assets in a specified time at a reasonable price.

Liquidity risk is a unique, material risk due to the need to respond to such risk within the shortest time possible. Materialization of this risk may cause the Bank to incur significant losses, or may even bring about collapse of the Bank.

Liquidity risk management – objectives and policies

The objective of liquidity risk management is to identify financing needs and sources of the Bank, to establish procedures for monitoring liquidity and setting minimum requirements for liquidity management.

Liquidity risk is managed in conjunction with Proper Conduct of Banking Business Directive 310 "Risks management", Directive 342 "Liquidity risk management", Directive 221 "Liquidity coverage ratio" and Directive 222 "Net stable funding ratio". The risk is managed subject to the limitations of the Board of Directors and Executive Management in an effort to minimize the losses deriving from an investment of surplus liquidity in assets that are highly liquid, but have a low yield.

Proper Banking Conduct Directive 221 "Liquidity coverage ratio" stipulates minimum liquidity ratios of 100% under stress scenario, for 30 days ("Regulatory LCR") of high-quality liquid assets to liquidity needs over this time period. As part of its risks management policy, the Bank's Board of Directors specified that additional safety cushions are to be maintained, beyond the regulatory minimum ratio; so that the target liquidity coverage ratio for the Bank and the Group would by 5% higher than the minimum required. This ratio is managed and reported for all currencies in aggregate and for NIS separately, both at Bank level and on Group basis. The ratio for the Bank solo and the consolidated ratio are calculated daily and reported as the average of daily observations over 90 days prior to the report date.

Proper Conduct of Banking Business Directive 222 "Net stable funding ratio" stipulates a minimum net stable funding ratio of 100% ("Regulatory NSFR") of available stable funding and required stable funding. As part of its risks management policy, the Bank's Board of Directors specified that additional safety cushions are to be maintained, beyond the regulatory minimum ratio; so that the net stable financing ratio for the Group would be 5% higher than the minimum required. This ratio is managed and reported in total for all currencies, on a consolidated basis. The reported ratio in the quarterly report is the ratio on a consolidated basis as of December 31, 2024.

These directives are in addition to liquidity risk management using internal models and to qualitative requirements, as stipulated by Directive 342.

Current and periodic management of liquidity risk is conducted on a Group basis, with due attention to legal, regulatory and operating restrictions on the capacity to transfer liquidity and includes monitoring of restrictions set by the Board of Directors and management as well as risk indicators, including with regard to financing source concentration, liquidity exposures at Bank and Group level as well as liquidity gaps resulting from on- and off-balance sheet operations.

The Bank's liquidity management is proactive and strict, including diverse tools for mitigating liquidity risk, both in using detailed models int different world situations, in strict maintenance of liquid means with minimal credit risk which may be immediately realized, and in active management of sources for diversification and extension of the term to maturity and diversification of sources. The Bank has a Liquidity Forum, which convenes daily, under the responsibility of the Finance Division, which discusses the liquidity situation and strives to align the liquidity "needs" of different Bank units with the liquidity "providers" and liquidity managers. In addition, a forum headed by the Finance Division Manager operates at the Bank, for regular monitoring of the implementation of the minimum liquidity coverage ratio directive (Directive 221) and the net stable funding ratio (Directive 222) and compliance with targets for all business units at the Bank for raising and management of resources. The Risks Management Division also conducts regular, independent controls over risk benchmarks, risk development and event debriefs, as needed.

The Liquidity Department is responsible for intra-day management of liquidity in Israeli and foreign currency. Daily liquidity management is conducted while maintaining a minimal reserve, as determined from time to time, in order to make unexpected payments. Balances are managed in conformity with the Bank of Israel directives (liquid assets), which require the Bank to maintain liquid assets against deposits in Israeli and foreign currency, at rates as specified in the directive. Any failure to comply with these directives would be reported to Bank management and to the Board of Directors soon after its occurrence.

If unusual changes in balances are observed during the day, in Israeli or foreign currency, an evaluation is conducted in terms of compliance with limits of the liquidity risk management model, and a decision is made as to whether proactive steps should be taken in response. Such steps may include conducting proactive transactions, contacting major customers etc.

As noted above, restrictions have been specified by the Board of Directors and by management for liquidity ratios under various scenarios, including for terms other than one month and in the normal course of business.

The Bank's emergency financing plans refer to management of each emergency and specify the management team responsible for handling it (by level). These plans include detailed specification of additional liquid means for use in emergency as well as a list of operative steps (and the entity authorized to lunch them), also referring to management of communications, both internal and external.

Business model

The policy on liquidity risk management is an integral part of strategic business management at the Bank and the Group and is aligned with Proper Conduct of Banking Business Directives 310 (Risk management), 342 (Liquidity risk management) and 221 (liquidity coverage ratio) and 222 (Net stable funding ratio).

As noted above, the Bank's Board of Directors specified that additional safety cushions are to be maintained, beyond the regulatory minimum ratios, so that the target liquidity coverage ratio and the net stable funding ratio for the Bank and the Group would be 5% higher than the minimum required. Bank management has specified additional safety cushions as guidelines, so as to avoid deviation from the Board of Directors' targets. It is Bank policy to maintain a liquidity coverage ratio and a net stable funding ratio including an appropriate safety margin relative to the Board of Directors' limits, along with efficient management of excess liquidity, in order to achieve maximum return for the Bank.

Approach to liquidity risk policy and setting limitations

The Bank's Board of Directors sets strategy for liquidity risk management and the risk appetite in conformity with regulatory requirements, using a range of restrictions on three risk dimensions: Normal course of business, scenarios (liquidity coverage ratio, net stable funding ratio and minimum liquidity ratio – internal model) and concentration. Bank management has specified a further set of restrictions to serve as management guidelines – beyond those specified by the Board of Directors.

Organizational structure for liquidity risk management

The Liquidity Risk Owner at the Bank is the Manager, Finance Division.

Liquidity risk management is conducted in conjunction with the general risks management framework at the Bank. This framework includes the following:

- First line – risk managers at the Finance Division
- Second line – risk controllers at the Risks Management Division
- Third line – Internal Audit.

All Bank units have some impact on liquidity risk. The policy document stipulates the requirement for co-ordination between these units, in order to create a uniform methodology to be used by the Bank for regular management of liquidity risk, compliance with daily requirements of financing needs, and preparation for potential emergencies, including adoption of immediate actions to properly address such emergencies.

Reports to management and to the Board of Directors

The Bank's Board of Directors and management receive various reports on a daily, weekly, monthly and quarterly basis, including reporting of compliance with limits specified by the Board of Directors and management, states of alert, cost of sources, data with regard to changes in balance sheet balances for deposits and credit, and any other information which the liquidity risk owner deems relevant for the report, including unusual events in liquidity management and unusual developments in the Bank's liquid sources. In 2024 there were no recorded deviations from the Board of Directors' restrictions.

Measurement tools and benchmarks

The Bank measures and monitors risk, primarily using the following models:

- Standard model – This model estimates the liquidity coverage ratio (LCR), which is the ratio of liquidity cushion to forecasted net outgoing cash flow. The forecasted net outgoing cash flow is defined as the difference between payments (cash outflows, with respect to liabilities) and receipts (cash inflows, with respect to assets) for a one-month term. This ratio is calculated under standard (uniform) coefficients specified by the Supervisor of Banks in Proper Conduct of Banking Business Directive 221 (Liquidity coverage ratio) and based on directives of the Basel III Committee.
- The dynamic liquidity coverage ratio (DLCR) is a key supporting tool for risk management and monitoring. For calculation of the DLCR, the daily LCR is calculated for 90 days ahead under multiple assumptions. The DLCR is calculated for the overall ratio and for the ratio in foreign currency, and is reported in the daily liquidity report.
- Internal model (minimum liquidity ratio – in conformity with Directive 342) – This model estimates the ratio of liquidity cushion to forecasted net outgoing cash flow, as required by Directive 342 and in conformity with Basel directives. In this model, stress scenarios were defined in Israeli and foreign currency, for different time horizons, based on behavioral attributes of depositors and on risk focal points, in line with the various scenarios.
- Standard model – This model estimates the Net Stable Funding Ratio (NSFR) – the ratio of stable funding sources (Available Amount of Stable Funding) – existing sources which are highly likely to be available to the banking corporation within 1 year or longer to total long-term uses (Required Amount of Stable Funding) – existing uses which the banking corporation is likely to be required to fund within 1 year or longer). This ratio is calculated under standard (uniform) coefficients specified by the Supervisor of Banks in Proper Conduct of Banking Business Directive 222 (Net stable funding ratio), based on directives of the Basel III Committee.
- Dynamic Net Stable Funding Ratio (DNSFR) is a tool used to assist in risk management and monitoring. DNSFR includes calculation of the ratio over a one-year horizon forward, subject to multiple assumptions. DNSFR is calculated for the overall consolidated ratio, and is reported as part of the daily liquidity report.

- Contractual liquidity differences – Review of balance sheet differences between inflows and outflows, with no behavioral assumptions and with no coefficients applied.

The Bank also applies tools for monitoring liquidity risk using endogenous and exogenous indicators, which may point to an increase in risk up to crisis status. The Bank developed an integrated benchmark for monitoring financial markets in Israel, in order to identify any instability in the financial system in Israel – this benchmark is a decision-support tool for declaring a state of alert due to systemic failure.

The Bank's Board of Directors and management receive various reports at daily, weekly, monthly and quarterly frequency – including reports of unusual events in liquidity management and unusual developments in the Bank's liquid sources. In 2024 there were no recorded deviations from the Board of Directors' restrictions.

The Bank reviews liquidity ratios both in the normal course of business and under certain scenarios. In the normal course of business, the Bank assumes no difficulty in conversion transactions between currencies. Furthermore, excess liquidity available for investment for a period of one year ahead is calculated, with no assumptions on raising new funds.

The scenarios used to review the liquidity ratios consist of three main scenarios (specific, system-wide and combined) and three additional scenarios (short specific, overseas system-wide and long combined), as set forth below:

- Main stress scenarios:
  - Specific – specific operational event / material lowered rating (by at least three notches) – scenario of embezzlement and/or disruption of Bank operations, including a prolonged disruption to its IT Systems.
  - System-wide – scenario involving a market emergency due to war, unusual defense events or financial events, which disrupt the normal day-to-day life in Israel, including the local capital markets.
  - Combined – system-wide event with expected implication for the Bank that is more severe than its expected implication to other banks, such as a crisis in the real estate market.
- Other stress scenarios:
  - Short specific – scenario describing a very high pressure due to lowered rating of the Bank; in this scenario, the impact is short but more significant than in the main stress scenarios.
  - Overseas specific – scenario involving shock which impacts overseas affiliates of the Bank / of Israeli banks and also has a low-level impact on operations in Israel.
  - Long combined – scenario reflecting a prolonged event. In this scenario, the stress level is lower than in main stress scenarios, but its impact is longer lasting, hence this scenario would impact a wider customer audience.

Scope and nature of reporting and measurement systems

Liquidity risk management system, used to calculate the overall liquidity, in Israeli currency and in foreign currency separately (including details in major currencies), including information about assets, liabilities and off-balance sheet liabilities of the Bank, compliance with limits specified by the Board of Directors and management, alerts with regard to trends in development of liquidity, the overall liability structure and in particular, liabilities to major depositors. The model results are displayed on a custom portal. The system is based on a daily database containing customer mapping, updated daily, from the Bank's data warehouse, and activity data obtained from the mainframe computer. The system includes controls to ensure data integrity and reliability. This information system is also used for reporting to the Bank of Israel, as stipulated by reporting directives 827 and 889 of the Supervisor of Banks and by the Public Reporting Directives.

Liquidity coverage ratio (LIQ1)

Below is information about liquidity coverage ratio(1) (NIS in millions):

	Three months ended December 31, 2024	
	Total unweighted value[2] (Average)	**Total weighted value[3] (Average)**
Total high quality liquid assets		
Total high quality liquid assets (HQLA)		**90,905**
Outgoing cash flows		
Retail deposits from individuals and from small businesses, of which:	184,185	11,353
Stable deposits	45,084	2,254
Less stable deposits	62,500	6,801
Deposits for term longer than 30 days	76,600	2,298
Non-secured wholesale financing, of which:	90,900	59,549
Deposits for operational needs (all counter parties) and deposits in chains of co-operative banking corporations	3,060	765
Deposits other than for operational needs (all counter parties)	87,113	58,058
Non-secured debts	727	727
Secured wholesale financing	-	258
Other liquidity requirements, of which:	192,522	76,877
Outgoing cash flows with respect to exposure to derivatives and other collateral requirements	67,890	67,890
Credit lines and liquidity	75,457	7,239
Other contractual financing obligations	-	-
Other contingent financing obligations	49,175	1,748
Total outgoing cash flows	**467,606**	**148,038**
Incoming cash flows		
Secured loans	4,615	267
Incoming cash flows from exposures repaid regularly	20,596	14,432
Other incoming cash flows	68,654	66,026
Total incoming cash flows	**93,865**	**80,725**
		Total adjusted value[4]
Total high quality liquid assets (HQLA)		**90,905**
Total outgoing cash flows, net		**67,313**
Liquidity coverage ratio (%)		**135**

(1) Information presented in terms of simple average of daily observations during the reported quarter. The number of observations used in calculating the averages in the fourth quarter of 2024 is 74.

(2) Un-weighted values are calculated as un-settled balances to be repaid or repayable by the holder within 30 days (for incoming and outgoing cash flows).

(3) Weighted values are calculated after applying appropriate safety factors or rates of incoming and outgoing cash flows (for incoming and outgoing cash flows).

(4) Adjusted values are calculated after applying: Safety factors and rates of incoming and outgoing cash flows, as well as other relevant limitations (i.e. limitation on high quality liquid assets and limitation on incoming cash flows, as set forth in Proper Conduct of Banking Business Directive 221).

Below is information about liquidity coverage ratio(1) (NIS in millions):

	Three months ended December 31, 2023	
	Total unweighted value(2) (Average)	**Total weighted value(3) (Average)**
Total high quality liquid assets		
Total high quality liquid assets (HQLA)		**82,465**
Outgoing cash flows		
Retail deposits from individuals and from small businesses, of which:	179,357	10,644
Stable deposits	41,515	2,076
Less stable deposits	55,753	6,106
Deposits for term longer than 30 days	82,089	2,463
Non-secured wholesale financing, of which:	87,998	56,636
Deposits for operational needs (all counter parties) and deposits in chains of co-operative banking corporations	4,369	1,092
Deposits other than for operational needs (all counter parties)	82,562	54,476
Non-secured debts	1,068	1,068
Secured wholesale financing	-	221
Other liquidity requirements, of which:	147,354	59,512
Outgoing cash flows with respect to exposure to derivatives and other collateral requirements	52,945	52,945
Credit lines and liquidity	56,779	5,208
Other contingent financing obligations	37,629	1,359
Other contingent financing obligations	35,185	2,426
Total outgoing cash flows	**414,709**	**127,013**
Incoming cash flows		
Secured loans	1,507	252
Incoming cash flows from exposures repaid regularly	17,405	12,267
Other incoming cash flows	54,327	51,376
Total incoming cash flows	**73,239**	**63,895**
		Total adjusted value(4)
Total high quality liquid assets (HQLA)		**82,465**
Total outgoing cash flows, net		**63,118**
Liquidity coverage ratio (%)		**131**

(1) Information presented in terms of simple average of daily observations during the reported quarter. The number of observations used in calculating the averages in the fourth quarter of 2023 is 79.

(2) Un-weighted values are calculated as un-settled balances to be repaid or repayable by the holder within 30 days (for incoming and outgoing cash flows).

(3) Weighted values are calculated after applying appropriate safety factors or rates of incoming and outgoing cash flows (for incoming and outgoing cash flows).

(4) Adjusted values are calculated after applying: Safety factors and rates of incoming and outgoing cash flows, as well as other relevant limitations (i.e. limitation on high quality liquid assets and limitation on incoming cash flows, as set forth in Proper Conduct of Banking Business Directive 221).

Key factors that impact results of the liquidity coverage ratio

The major factors affecting the liquidity coverage ratio results are composition of Bank sources and uses. High quality liquid assets (HQLA) are assets at level 1, typically highly negotiable and carrying low risk, including: cash, current and deposit accounts with central banks, bonds of sovereigns with risk weighting of 0% and bonds of the State of Israel. Most of the outgoing cash flow is against non-secured wholesale financing – deposits deposited at the Bank by corporations and financial entities, as well as outgoing cash flows with respect to exposure to derivatives. Cash inflows primarily consist of credit receipts and inflows with respect to exposure to derivatives.

Typically, the ratio is mostly cyclical, and may be forecasted using internal estimates of the Bank. The key factor which affects over time the development of this ratio is growth of Bank operations, both in raising and managing the source structure and in increased uses. There is some volatility between days of the month, due to current activity of customers and interchangeability between NIS and foreign currency, primarily due to activity in NIS / foreign currency derivatives.

Composition of high quality liquid assets (HQLA)

Below is information about liquid assets by level, as required under Proper Conduct of Banking Business Directive 221 (NIS in millions):

	December 31		Average for the fourth quarter	
	2024	**2023**	**2024**	**2023**
Level 1 assets	90,113	88,151	90,826	82,393
Level 2a assets	52	44	50	45
Level 2b assets	27	30	29	27
Total HQLA	**90,192**	**88,225**	**90,905**	**82,465**

Developments in liquidity coverage ratio

In the fourth quarter of 2024, the Bank maintained appropriate liquidity by investing excess liquidity in liquid assets of very high quality – Level 1 assets. The average liquidity coverage ratio (consolidated) for the fourth quarter of 2024 was 135%.

Net stable funding ratio (LIQ2)

On June 21, 2021, the Supervisor of Banks issued Proper Conduct of Banking Business Directive 222 regarding "Net stable funding ratio (NSFR)", which stipulates calculation of the ratio as specified in the Basel III Reform of the Basel Committee (BCBS). The Directive became effective on December 31, 2021.

In conformity with this directive, the objective of the net stable funding ratio is to improve stability of the liquidity risk profile of banking corporations over the long term, by requiring banking corporations to maintain a stable funding profile in conformity with the composition of on-balance sheet assets and off-balance sheet operations. The ratio limits over-reliance by banking corporations on short-term wholesale funding. The net stable funding ratio consists of two components: available stable funding items and required stable funding items.

As required in the directive, the net stable funding ratio should be 100% or higher on regular basis.

In conformity with the directive, "Available stable funding" is defined as the part of capital and liabilities that may be relied upon over the time horizon taken into account in the net stable funding ratio, of one year. The required stable funding amount for a given corporation is based on the liquidity attributes and time to maturity of various assets held by the corporation, as well as of off-balance sheet exposures.

Below is information about the net stable funding ratio[1] (NIS in millions) as of December 31, 2024:

	A	B	E	D	S
	Non-weighted value by term to maturity				Weighted value
Available stable funding items (ASF)	**No redemption date[1] maturity (1)**	**Up to 6 months 6 Months**	**6-12 months Up to 1 year**	**12 months or longer**	
Capital:	36,109	40	3	4,944	41,054
Supervisory capital	36,109			1,678	37,787
Other capital instruments		40	3	3,266	3,267
Retail deposits from individuals and from small businesses		140,494	22,181	5,828	154,795
Stable deposits		47,948	3,224	1,065	49,678
Less stable deposits		92,546	18,957	4,763	105,116
Wholesale financing		180,631	34,053	44,284	99,389
Deposits for operational needs		2,667			1,334
Other wholesale financing		177,964	34,053	44,284	98,055
Liabilities with matching assets which are inter-dependent					
Other liabilities:	268	2,218	2,024	10,334	11,345
Liabilities with respect to derivative instruments for net stable funding ratio				5,123	
All other liabilities and capital not included in the above categories	268	2,218	2,024	10,334	11,345
Total available stable funding items (ASF)					306,583
Required stable funding items (RSF)					
Total high-quality liquid assets by net stable funding ratio (HQLA)					1,036
Deposits held at other financial institutions for operational purposes					
Loans and securities in good standing:		68,788	34,080	259,161	257,363
Loans to financial institutions in good standing, secured by level 1 high-quality liquid assets					
Loans to financial institutions in good standing, secured by high-quality liquid assets other than in level 1, and loans to financial institutions in good standing which are not secured		7,073	8,274	10,228	15,426
Loans to wholesale customers, other than financial institutions, which are in good standing, loans to retail customers and to small businesses and loans to sovereigns, to central banks and to public sector entities		50,014	15,252	44,953	70,235
Of which: With risk weighting of 35% or lower, pursuant to Proper Conduct of Banking Business Directive 203				2	1
Residential mortgages secured by mortgage in good standing, of which:		11,699	10,553	203,684	171,449
Of which: With risk weighting of 35% or lower, pursuant to Proper Conduct of Banking Business Directive 203		3,894	3,528	64,043	45,339
Securities not in default which do not qualify as high-quality liquid assets, including shares traded on the stock exchange		1	1	296	253
Assets with corresponding liabilities which are inter-dependent					
Other assets:	2,641	2,101	1,177	1,226	8,587
Physically traded commodities, including gold					
Assets deposited as primary collateral for derivative contracts and provided to default funds of central counter parties (CCPs)				1,417	1,417
Assets with respect to derivative instruments for net stable funding ratio				5,526	20
Liabilities with respect to derivative instruments for net stable funding ratio, before deduction of variable collateral deposited				6	6
All other asset categories not included in the above categories	2,641	2,101	1,177	1,266	7,145
Off-balance sheet items				124,285	5,516
Total required stable funding (RSF)					272,502
Net stable funding ratio (%)					113

(1) Items reported under "No maturity" are items with no specified maturity.

Key factors that impact results of the net stable funding ratio

Net stable funding ratio on a consolidated basis as of December 31, 2024 was 113%, which was the ratio as of the end of 2023.

The volatility of this ratio throughout the quarter was low; the main factors affecting the net stable funding ratio are: composition of Bank sources and uses by financing term, financing type and counter party. On the sources side – long-term liabilities are more stable than short-term liabilities, and funding from retail customers and small businesses is more stable than wholesale funding with the same maturity. When long-term sources grow shorter on a large scale (such as with subordinated notes) to a term shorter than one year, this factor affects the resulting ratio; however, because this is a funding source which typically has scattered maturities, the impact on the resulting ratio is not material. On the uses side – asset type, asset term and quality and liquidity value determine the required stable funding amount.

Pledged assets (ENC)

Proper Conduct of Banking Business Directive 336 concerning "Pledging assets of a banking corporation" stipulates a guiding principle to balance the need of running a business and the need of protecting rights of depositors in case of insolvency. The directive stipulates that a banking corporation may only pledge assets if required by law, regulation or relevant market requirements.

In conformity with Public Reporting Directives, pledged assets are assets which the Bank is limited in or precluded from liquidating, selling, transferring or assigning them due to legal, regulatory, contractual or other restrictions, and which are not included under "Assets used as collateral for a central bank".

Un-pledged assets are assets that do not meet the definition of pledge assets and are not included under "Assets used as collateral for a central bank".

Assets used as collateral for a central bank (central bank facilities) are assets used as collateral for transactions, or which may be used as collateral for transactions in any central bank facility, including those used for monetary policy, liquidity support or any other financing needs.

In conformity with Bank policy on pledging assets, the Bank's strategic business activity, which includes extensive financial activity, as well as flexible, efficient management of Bank liquidity, requires pledging some Bank assets in the course of such activity. Thus, for example, the Bank allows customers to trade on diverse markets (securities in Israel and overseas, interest and foreign currency derivatives) and offers an extensive range of products and services. This activity is also carried out through third parties and vis-à-vis clearinghouses, and sometimes requires assets to be pledged.

Below is the composition of pledged and un-pledged available assets (NIS in millions):

			As of December 31, 2024
	Total balance on balance sheet	**Of which: Pledged**	**Of which: Non-pledged**
Cash and deposits with central banks	81,143	1,894	79,249
Bonds of the Government of Israel	23,245	598	22,647
Bonds of others in Israel	2,055	-	2,055
Bonds of overseas governments	1,961	389	1,572
Bonds of others overseas	332	-	332
Loans to the public, net	357,981	-	357,981
Total	466,717	2,882	463,835
			As of December 31, 2023
	Total balance on balance sheet	**Of which: Pledged**	**Of which: Non-pledged**
Cash and deposits with central banks	84,443	2,815	81,628
Bonds of the Government of Israel	19,452	265	19,187
Bonds of others in Israel	1,932	-	1,932
Bonds of overseas governments	583	216	367
Bonds of others overseas	486	-	486
Loans to the public, net	325,346	3,413	321,933
Total	432,242	6,709	425,533

Additional information about liquidity risk and financing risk

Financing risk

Financing risk arises from shortage of financing sources or too high costs to raise sources. This risk is managed, as part of the liquidity risk, using Board and management restrictions on concentration of financing sources and through reduced dependence on material counter-parties.

The Bank's main financing sources are stable and diverse sources for different time horizons – retail and business deposits, long-term deposits from financial institutions and issues of bonds and obligatory notes. The Bank sees the great importance of diversification of its financing sources and acts proactively to identify sources for longer terms, including through a wide range of deposits offered by the Bank to its customers, deposits with unique attributes, which allow customers to benefit from relatively high interest over the long term with optional liquidity during the deposit term. In 2024, the Bank continued diversifying its financing sources and reducing concentration risk.

Furthermore, exposure to derivatives is regularly managed, in line with the exposure to each counter-party, counter-party collateral is immediately increased or collateral is immediately demanded from the counter-party.

Concentration of financing sources

The Bank has specified the major risk concentrations for handling source concentration / structure. Handling of risk concentrations is focused on different levels, regularly conducted by means of Board and management limits as well as risk indicators.

The Board of Directors and management limits and the various key risk indicators with regard to financing source concentration are monitored across a wide range of sub-categories: Size, customer type, individual depositor, number of customers, product, currency and average deposit term. A "comprehensive index" was defined, which averages all indicators related to concentration of financing sources. Current management of source composition includes setting policy on source diversification and financing terms as well as setting specific targets for risk benchmarks. Concentration is monitored daily and is regularly managed and reported.

The Board of Directors and management limits were specified as part of the Bank's overall risk appetite.

For more information about financing sources, see chapter "Developments in financing sources" in the Report by the Board of Directors and Management.

Operational Risk

Operational risk is defined as the risk of loss due to inappropriateness or failure of internal processes, people and systems or due to external events. Operating risk is material as it occurs across all areas of activity and in all Bank units. Operating risk may potentially impact earnings, revenues, capital and reputation of the Bank and is correlated with other risks, such as: market risk, credit risk, liquidity risk, reputation risk and other risks. Operating events sometimes occur which are not under control of the Bank, and may develop as a result of external events, some of which are unforeseen, with chances of occurring which cannot be estimated in advance, such as: natural disaster (earthquake, flooding), pandemic or security event. Therefore, efficient risk management is crucial for the Bank's risk management processes.

Operational risk is inherent in all products, activities, processes and systems at the Bank. With the developments in global markets and the higher complexity of financial activity and supporting technological infrastructure, an understanding has emerged that Bank exposure to potential loss due to failures in regular operating activity may impact the business activity.

Operational events are classified under seven risk categories, in conformity with Basel principles: Embezzlement (Bank defrauded by its employees), external fraud (Bank defrauded by customer), work practices and safety of the work environment (loss due to actions not in line with labor laws or agreements), practices regarding customers, products and business (failure to meet obligations to customer), damage to physical assets, performance, distribution and process management and business disruptions and system failures.

The Bank manages and measures operational risk base on these categories as well.

Operational risk management – objectives and policies

The framework policy on operational risk management specifies the principles whereby the Bank manages operational risk, risk materiality, how it is managed, measurement and monitoring processes and actions taken by the Bank to mitigate such risk.

Policy principles were specified in line with Bank strategy with regulatory requirements (Proper Banking Conduct Directives of the Bank of Israel and relevant Basel Committee directives) and in line with globally accepted practice.

The policy elaborates the corporate governance and the roles and responsibilities of the various lines of defense and stipulates the importance of deploying an appropriate culture for management of operational risks at the Bank and Group. Risk management at the Bank is carried out in conformity with Bank of Israel directives: Directive 350 "Operational risks management" and Directive 310 "Risk management", which specify the overall risk management framework, and the Basel document "Principles for management of operational risk" (dated October 2014), which specify the rules for proper management of operational risk.

The Bank framework for handling operating risk is reviewed quarterly, as part of the Bank's Risks Document. The risk profile is presented in this context, i.e. the actual loss level, in view of the risk appetite, the operational risk map and the most material events which occurred during the quarter.

The Operational Risk Manager at the Bank is the Manager, Risks Management Division – who is also the Bank's CRO, responsible for proper implementation of the operational risk handling framework, acting through the Risks Management Division. The framework stipulated also includes the framework required for handling fraud and embezzlement risks, which are part of the operating risk categories according to Bank of Israel directives.

Bank policy determined the Bank's operational risk appetite in multiple qualitative and quantitative aspects, under normal business conditions and under stress scenarios. The risk appetite was specified with respect to actual losses and potential losses, at the overall portfolio level and by risk category. The policy document was approved by Bank management and by the Board of Directors in 2024, as part of the approval process of all policy documents for risk management and control.

This risk is regularly monitored by review of various operational failure events.

The Bank acts to dynamically measure and identify operational risk on two levels: Measuring loss and identifying risks based on failure events that actually materialized, and in reference to materialized and potential risks in the operational risk survey process. Operational surveys are conducted for all Bank operations, in conformity with a three-year plan. The Bank implements a three-year plan for conducting operational risk surveys for all Bank operations. This activity is an on-going process designed to generate a risk map, to increase the effectiveness of risk management and mitigation, while learning, re-assessing risk, including to due materialized events.

The Bank monitors and documents all operational failure events, including events for which a loss was incurred, as well as events with no loss or even events with a profit. Measurement of actual loss vs. the risk appetite in the normal course of business only includes loss events (without offset of profit events) and after accounting for any insurance coverage if actually realized.

The Bank conducts surveys to identify and map potential operational risks at various divisions, as a continuous process focused on mapping and assessment of material risks at each unit. The Bank has specified multiple key risk indicators (KRI) designed to identify potential risk prior to materialization. The survey results and action items (AI) are discussed, as part of self-assessment processes, by specific forums, attended by managers of the surveyed units and representatives from the Risks Management Division.

In addition to these surveys, the Bank also analyzes external events in Israel and overseas, which may provide information about potential circumstances and damage which may result in materialization of operating risk. Such analysis serves the Bank in implementation of appropriate steps for parallel processes within the Bank.

The Bank is acting to improve the effective handling of fraud and embezzlement risk. As part of this effort, the Bank is implementing a system using business laws to flag and identify unusual activity. Handling of fraud and embezzlement is in conformity with a specific operational risks management framework policy document and the policy document on management of embezzlement risk. The framework includes a combination of Bank entities: Internal Audit, Risks Management, information security and cyber, human capital, Security Unit and the Technology Division.

Business model

The Bank actively handles operational risk in order to support operations of the business units, to improve major business processes associated with their operations and thus, to increase business value, rather than only reduce expected loss due to operational risk.

With the developments in global markets and the higher complexity of financial activity and supporting technological infrastructure, an understanding has emerged that Bank exposure to potential loss due to failures in regular operating activity may impact the business activity. Operating failure events which occurred at financial institutions have increased legislator awareness and financial institutions' awareness of materiality of operating failure events, to the large potential for damage which may be caused by such operational risk event and to their main attributes, as follows:

- Operating events may occur in all areas of activity and in all Bank units.
- Operating risk may potentially impact earnings, revenues, capital and reputation of the Bank.
- Operational risk is correlated with other risks, including: market risk, credit risk, liquidity risk, reputation risk and other risks. Thus, for example, materialization of an operational risk event may cause reputation risk to materialize, after which the Bank may face a liquidity event.
- Some operating failures have very low probability of materialization, but relatively large damage potential.
- Operating risk has diverse instances, from human error, malfunction in technological systems, fraud, embezzlement, war, fire, robbery etc.
- Operating events sometimes occur which are not under control of the financial institution, and may develop as a result of external events, some of which are unforeseen, with chances of occurring which cannot be estimated in advance, such as: natural disaster (earthquake, flooding), plague and security event.

In 2024 there were no significant operating failure events.

Approach to operational risk policy and setting limits

The basic principles of the strategic plan specify the overall risk appetite of the Bank, include efficient branch deployment, business and technology innovation, hybrid banking management, operational efficiency targets, efficiency in capital and liquidity management, along with growth in commercial credit and continued leadership in the mortgage market, exposing the Bank to significant operational risk. Such risk requires active, forward-looking action to manage and to minimize the potential impact.

As noted, the Bank acts to measure and identify operational risk inherent in all products, activities, processes and material systems of the Bank, dynamically, on two levels:

- Measuring actual materialization of failure events.
- Risks assessment for damage potential with respect to failure events.

The activity on these two levels is a constant process designed to increase the effectiveness of risks management and mitigation, while learning, reassessing risks, including to due materialized events.

The Bank reviews the capital held against operational risk under Pillar 1, calculated using the standard approach, vs. advanced Basel methodologies, in order to assess whether an additional capital allocation is required under Pillar 2, in the normal course of business. The Bank also applies a range of operational stress events, mapped in the Bank's operational risk map as events causing material damage to the Bank. Such potential loss is added to the internal capital allocation under Pillar 2, as part of the ICAAP process.

Organizational structure for operational risk management

The Bank has put in place an organizational structure and corporate governance for management of operational risks, which includes the Board of Directors, management and the three lines of defense. This structure is supported by dedicated committees and forums, created for management of operational risk.

The framework for handling operating risk is based on three lines of defense:

First line of defense: Includes all business and operational units at the Bank which are responsible for management of operational risk, and in particular, the Technology Division, which is the first line for management of cyber and information security risk, business continuity and IT, as well as Mizrahi Tefahot Security Services, which forms the first line for security and safety management.

Second line of defense: The Risks Management Division through the Risks Management Department, acting to implement the required activity for management and handling of operational risk across all Bank units, from a general viewpoint and in conformity with policy principles, is responsible for constant monitoring of operational risk vs. the risk appetite and for handling risk in view of activities of the first line, using a range of processes, tools and methods. The unit is also responsible for the risk assessment process, jointly with the business units, and for conducting surveys and for revision of the operational risks map, management of the central IT system used by the Bank with regard to operational risk, used to collect failure events, conduct operational surveys and to monitor the recommendations for implementation arising from surveys, failure events and lessons learned.

Other units in the second line of defense, to handle and manage operational risk:

- The Technology Division, which - as mentioned above - constitutes the first line for management of cyber and information security, is also responsible for management of operational risk arising from failures in IT systems, including DRP management as part of the business continuity policy.
- The Training Department, of the Human Capital and Resources Division, acts to reinforce professional knowledge and to reduce operating failures arising from lack of knowledge and awareness.
- The Cyber and Information Security Department of the Risks Management Division, headed by the Bank's Information Security Officer. This Department works in tandem with cyber defense at the Technology Division, along with all Bank units.
- The Engineering Department of the Banking Operations Sector is responsible for overall business continuity management, i.e. Constant Bank readiness for business continuity in case of emergency.
- The Human Capital and Resources Division, responsible for handling continuous rotation and paid leave to minimize operational risk (and in particular, fraud and embezzlement risk).
- The Bank Security Department, operating in the Human Capital and Resources Division, supports handling of operational risk at various Bank units.
- The SOX Unit, of the Financial Information and Reporting Division, is responsible for effectiveness of controls and procedures concerning disclosure and effectiveness of internal controls over financial reporting at the Bank.
- The Legal Division, responsible for implementation of the framework for handling legal risk.

Third line of defense: Internal Audit acts independently to conduct audits of operational risk management in order to ascertain the effectiveness of handling such risk, in accordance with the multi-annual work plan. The operational risk policy specifies the role of Internal Audit as the entity in charge of carrying out periodic audits of risk management processes, debriefing of fraud and embezzlement events, participation as observer on steering committees.

On June 19, 2024, the Bank Supervisor published a circular that updates Proper Bank Management Directive 206, on calculating operating risk in accordance with the terms of the Basel Agreement from December 2017. The Directive comes into effect on January 1, 2026. The Bank is preparing to implement the directive. Application of the directive is not expected to have any material impact on the Bank's financial statements.

Below are key risk concentrations for operational risks:

Model risk

Model risk is included in the group of operational risks; it might arise from poor use of models due to an incorrect model and/or reliance on incorrect interpretation of the results of a model.

On August 21, 2024, the Supervisor of Banks issued a circular establishing Proper Conduct of Banking Business Directive 369 regarding model risk management. The directive describes the key aspects of effective management of model risks; it supersedes the letter issued by the Supervisor of Banks on the subject of October 17, 2010.

The directive will come into effect a year after its publication date, and it includes guidance as to the various stages of management of the Bank's model risk: Model development, management, validation and monitoring. The Bank is preparing to implement the directive. Application of the directive is not expected to have any material impact on the Bank's financial statements.

Business continuity

The Bank applies Proper Conduct of Banking Business Directive 355 concerning "Management of business continuity" and in the fourth quarter of 2024, completed implementation of the 2024 work plan and exercise plan.

During the course of the year, the Bank continued to implement the business continuity plans derived from the war, and in view of the continuation of the Special Homefront Situation and the National State of Emergency, it maintained it "orange" alert level (concerns for damage to Bank's sites and large-scale absence of employees, which might impair the Bank's services). The Bank has put into action its emergency management and reporting framework, including frequent convening of an extended situations room and a financial exchange rate forum at times of emergency.

The Bank increased the preparedness of its emergency sites and continuously monitored their orderly functioning. The Bank maintains availability and continuity of essential services to customers in as much as possible, in conformity with restrictions, and acts to create appropriate alternatives for service provision, implementing highlights and relief in service provision as issued by the Supervisor of Banks. The Bank has extended work from home for essential employees, and has elaborated the relevant operating procedures and processes.

As to Group-level control, in this quarter, too, the Bank continued to maintain continuous contact with business continuity units of the Group and its overseas branches, and monitored the implementation of the guidance and the preparedness to the war with Group subsidiaries.

Information security and cyber defense

Information security risk is risk arising from faults in protection of the Bank's computer systems and information stored there. Cyber risk arises from an event including an attack on computer systems by or on behalf of internal or external adversaries of the Bank.

Directive 361 with regard to Cyber Defense Management provides guidelines for proper management of cyber risks, which require expansion and adjustment of the IT risks management framework with regard to the threat space concept and the required defensive capabilities. Accordingly, the Bank Board of Directors approved a comprehensive cyber defense strategy with reference to all required defensive components. Moreover, lines of defense for implementing it were specified. The Bank's cyber security is led by the Chief Information Security Officer, reporting directly to the Manager, Risks Management Division – responsible, inter alia, for setting policies on information security and cyber defense at the Bank, development of a cyber defense work plan. There are also several management-level forums that conduct quarterly monitoring of risk management and mitigation, as well as control over appropriateness of resources allocated to this area, in conformity with the risk assessment and changes to the technology environment at the Bank.

The relationships and information flow between these units have been specified in procedures, including reference to: Information security, physical security, IT governance, IT operations, risks management, fraud, human resource management, business continuity, customer relationship management, spokesperson operations and legal counsel.

Information security and cyber defense policies at the Bank are implemented, inter alia, by the Mizrahi Tefahot Technology Division Ltd. As part of this effort, the management concept applied includes guidelines for management of cyber security. Application of these guidelines and ensuring that they are current while incorporating them into strategic decisions and business and operational activity at the Bank – will ensure the consistency and integrity of the cyber security management concept over time.

The information security and cyber security policy is based on the following principles:

- Mapping and identifying cyber risks.
- Establishing an effective set of controls with cross-organizational integration of technology, human resources, processes and procedures.
- Specifying mechanisms to protect customer and business activities in the online domain, in conformity with Proper Banking Conduct Directive 367.
- Proactive cyber security implemented through mapping and knowledge of the environment, forecasting and study of threats, weighting of the current situation report, development of responsiveness processes, use of techniques for deception, diversion and delay, stability and recovery capacity, conducting processes of investigation, debriefing and execution of judgment.
- Implementation of multi-layer security in several circles and disciplines (both logical and physical), from the external system accessible to customers and through to internal systems, information and intelligence sharing.
- Using a system for monitoring, control and response for management of cyber events with integrated, corporate-wide view of components such as human resources, means of communications and procedures.
- Periodic and current reporting of risks management as a whole.
- Current analysis and assessment of cyber threats and exercising all those involved in handling cyber events.
- Development of stress scenarios related to information security and cyber.
- Improvement and enhanced controls among Bank suppliers, so as to reduce risk in the supply chain.

In addition, the Bank's E-Banking sector is certified under the information security management standard ISO 27001.
E-banking processes at the Bank include implementation of information security processes in conformity with Proper Conduct of Banking Business Directive 367, including authentication mechanisms, transmission of information to customers and identification of exceptional transactions.

Supplier and outsourcing risk

The Bank works with a wide range of suppliers for various business needs. Using suppliers and outsourcing allows the Bank to achieve strategic targets, obtain expertise, expand the product range and improve service. Contracting with suppliers exposes the Bank to risks including the following: Operational, business continuity, information leakage, technology, compliance, legal, reputational and so forth. These risks are regularly managed through risk management processes, procurement processes (backed by supporting IT systems), business continuity and information and cyber security; the processes are carried out in accordance with a policy for management of suppliers and outsourcing risk, which was formulated and approved by the Bank and is validated every year, in accordance with Proper Conduct of Banking Business Directive 359A - Outsourcing.

IT risk

In recent years, the risks associated with IT management have increased, due to development and deployment of new technologies and evolution of new risk and threats. The IT management framework address existing technology risks in normal situations, along with risks that exist in system-wide failure situations, such as: system faults, as well as in other emergency situations. This is in order to ensure the business continuity of the Bank and its customers, thus mitigating reputation risks and business risks which could arise under such conditions.
The Technology Division Manager is responsible for management of IT assets and the management framework is specified in a special policies document, in line with principles specified in policy documents on risks management and control at the Bank. The IT asset management policy is in line with requirements of the Supervisor of Banks and, in particular, with the principles stipulated in Proper Conduct of Banking Business Directive 357 "IT management"; Proper Conduct of Banking Business Directive 350 "Operational risk management"; Proper Conduct of Banking Business Directive 355 "Business continuity management" and Proper Conduct of Banking Business Directive 361 "Cyber security management".
Risk appetite is defined in quantitative and qualitative terms under normal and emergency scenarios, with the Bank's risk appetite for IT risk included under management of operational risk appetite. Risk appetite for technology aspects is defined by multiple benchmarks, including risk levels on the map of technology risk and specific risk appetite for diverse risk factors.
The Bank applies diverse measures to monitor and mitigate risks, including through methodological risk mapping, a set of Key Risk Indicators (KRI) and systems supporting risk monitoring and mitigation. Note that the SOC (Security Operation Center) operates 24/7 and is responsible for monitoring Bank infrastructure and systems, analyzing logs and identifying anomalies in real time, unusual behavior of users and systems in the network from information and cyber security aspects. The Bank also has a NOC (Network Operations Center), operating 24/7 as an operational unit for presenting the unified picture of enterprise infrastructure, capability for monitoring and forecasting faults, analyzing logs and identifying anomalies from technology risk aspects. In 2024, the Bank continued to bolster these capabilities.
On November 18, 2024, the Supervisor of Banks published Proper Conduct of Banking Business Directive 364 regarding management of IT, information security and cyber security risks. The Directive will come into effect in May 2026. The Directive changes the existing regulatory framework for management of technological risks to the ever-changing technological environment and threats and to the regulation generally accepted across the world. This Directive replaces the three previous directives: Proper Conduct of Banking Business Directive 357 - Information Technology Management, Proper Conduct of Banking Business Directive 361 - Cyber Defense Management, and Proper Conduct of Banking Business Directive 363 - Supply Chain Cyber Risk Management.

Legal risk

Proper Conduct of Banking Business Directive 350 concerning "Operational risks" defines legal risk as including absence of potential for legal enforcement of an agreement and "including, but not being limited to exposure to fines or penalties arising from supervisory action, as well as from individual arrangements". Legal risk also includes risks arising from legal exposure due to Bank conduct with its various stakeholders (such as: customers, suppliers and other third parties).
Legal risk includes risks arising from legislative and regulatory provisions, rulings by judiciary or quasi-judiciary authorities as well as legal risks arising from regular Bank operations. The Chief Legal Counsel for the Bank has been appointed Chief Legal Risks Manager. The Bank constantly strives to minimize as much as possible the legal risks associated with its current operations, and acts to disseminate a practical culture leading to identification and mitigation of legal risk in all its different aspects.
The Bank's Legal Division regularly analyzes the legal risk components, the risk boundaries (arising, for example, from the counter-party identity, from creation of collateral etc.) as well as specific risk attributes while reviewing its risk level and exposure with attention to the different lines of business at the Bank and provides current legal advice to the Bank and its various units.
The Bank's Legal Division applies internal processes to ensure regular monitoring of developments in legislation, rulings and other regulatory provisions which could have implications for the day-to-day activities of the Bank Group. In this context, the Legal Division provides guidance to relevant Bank entities with regard to implementation of the implications arising from these developments. The Legal Division provides regular counsel to different Bank units, including to some subsidiaries. This is done, inter alia, by providing opinions, editing and updating legal documents, support for updates to procedures etc.
The Bank has specified procedures to help in minimizing legal risk, including regulating the interface between the Legal Division and different Bank departments. The Legal Division is also involved in training delivered to branches and headquarters units, at the Bank's Training Center and in compiling professional eLearning kits for imparting the legal knowledge required for regular Bank operations.
Similar reference is made for Bank affiliates overseas, with these affiliates receiving assistance from local external attorneys approved by the Bank's Legal Division. The Bank's subsidiaries and overseas affiliates have adopted similar procedures with regard to management of legal risk, and provide immediate and quarterly reports to the Legal Risk Manager of the Bank with regard to any legal risks identified in these entities.
For more information about assessment of the current impact of legal risk, see table "General mapping of risk factors and their impact" above.

Scope and key features of risks measurement system

In general, it is Bank policy to manage and to monitor risks using controlled, computer-based systems with minimal dependence on manual processes and with near-real time update frequency.

The Bank has many measurement systems used to estimate all material risks to which the Bank is exposed, as well as IT systems to support risks monitoring and reporting; set forth below are the key systems:

- A custom system for operational risks management (PSTL – Operational Risk Portal), used by the Bank to collect, monitor and analyze failure events, risk surveys and to generate a risk maps, linking any actual materialized events to the risk map, regular monitoring of recommendations for implementation arising from surveys, failure events, lessons learned and reports with regard to operational risk.
- System for monitoring embezzlement risk – The system provides alerts concerning suspect activity, based on definition of business rules.
- System for monitoring fraud risk – a set of rules for monitoring fraud risk, which generates alerts concerning suspicious activity, based on business rules defined in the system.
- Information security center (SOC) system – systems that continuously monitor the Bank's computer environments, including all components thereof, to identify suspect events that require individual scrutiny.
- Permission management and control system – a computer system for management and control of permissions and credentials in various systems. The system applies computer-based processes for management of employee permissions in the various systems, based on their role and the employee life cycle. The system allows for application of time-based controls with regard to changes made to employee permissions in these systems.

Reports to management and to the Board of Directors

Bank policy specifies the channels for management and reporting of operational risk, designed to ensure proper risk management for all products, activities, processes and material systems of the Bank. To this end, the Bank operates forums at all levels, tasked with handling operational risk; the following are the key forums:

- Management committee for operational risks – this committee serves as management's key managerial tool for management and monitoring of operational risks at the Bank. The Committee is part of the management committee for risks management.
- Operating Risk Steering Committee – serves as an advisory committee to the Chief Risks Officer with regard to operating risk management. The committee includes relevant representatives from business units, from control and audit units and an observer from the audit unit.
- Operational risks monitoring forums – Dedicated forums headed by the Chief Risks Officer, with each of the relevant Bank divisions. These forums are intended to discuss internal control aspects, in particular aspects arising from the operating risk management framework, including results of risk assessment surveys, material events and results of debriefs.

For management of this risk at Bank units, operational risk trustees were appointed, most of whom operate in the first line of defense, are responsible for handling operational risk and IT risk at their unit.

Operating risk mitigation

Due to the significance of operating risk, the Bank takes different steps to mitigate this risk. The most important step is to instill a corporate culture which promotes strong awareness of operating risk, and of deployment of risk-mitigating processes. The operational risk trustees, across the Bank, are the long arm of the Operational Risk Owner in this process. The Bank distributes relevant papers and holds dedicated training sessions for those trustees.

In addition, the Bank implements steps to increase awareness of the operational risk, mainly from a fraud perspective, including to customers.

Changes to existing business processes and/or new processes with potential for materialization of operational risk undergo a structured process of approval by business entities and by control entities, prior to launch, using a checklist – and are sent for approval by the Steering Committee. This mechanism is used to review all aspects of the change, ensuring a professional review of the root risk and how to mitigate it.

One of the tools used by the Bank for risk mitigation is debriefing and lesson learning flowing internal and/or external events. The conclusions formed in this process are incorporated into work processes, systems, training content and procedures.

The Bank has established policies and operating plans for case of emergency, for backup, recovery and business continuity in case of physical damage to Bank infrastructure. This plan, supported by emergency procedures and pre-appointed officers, is exercised annually and the conclusions from such exercises are incorporated into the action plan.

Mitigating operational risk through insurance – the Bank is insured under a banking insurance policy against damage which may be incurred in the course of normal operations, as a result of human error, fraud, embezzlement etc. The Bank acquires an officers' insurance policies, which applies to all officers at the Bank and at the different Bank Group companies, which provides insurance coverage for personal claims which may be filed against officers with respect to their actions in the course of their position with Group companies. Obtaining such an officer liability insurance policy is subject to approval by the General Meeting of Bank shareholders.

The Bank has obtained specific insurance policies for property damage and liability, which provide insurance coverage of Bank property and liability. The Bank also has insurance coverage under a custom cyber insurance policy, an additional layer over the banking insurance policy, which adds coverage related to computer-based crimes to the banking insurance policy. The Bank has a specific policies document which governs insurance aspects related to Bank operations.

Capital allocation

The Bank allocates capital with respect to operating risk using the standard approach. According to this approach, Bank revenues were categorized into eight lines of business, as stipulated by the Bank of Israel, with a standard risk weighting assigned to each line of business, reflecting its sensitivity to loss with respect to operational risk. Segmentation and treatment of the required capital allocation is incorporated in a specific policies document which governs the aspects required for capital allocation using the standard approach and, in particular, specifies the lines of business in Bank operations. Risk weightings range from 12% for retail banking to 18% for corporate financing. Bank operations are mostly in the retail segment, so that most of the operational risk assets are with respect to this line of business; the Bank's overall average risk weighting is 12.8%.

Other risks

Compliance and regulatory risk

Bank business operations are subject to regulation. Compliance risk is the risk of the imposition of sanctions, material financial loss or damage to reputation, which the Bank may incur due to its failure to comply with various compliance provisions.

The Bank is acting in conformity with Proper Conduct of Banking Business Directive 308, which includes the obligations for compliance risk management to all compliance directives, including laws, rules and regulations (including positions stated by the Supervisor of Banks in conjunction with handling public inquiries), internal procedures and the Code of Ethics which apply to banking operations at the Bank.

Compliance provisions also include the following laws: ISA Enforcement Proceeding Streamlining Law (Legislative Amendments), 2011; Securities Law 1968; Mutual Investment Law, 1994; Arrangement of Engagement in Investment Consultancy, Investment Marketing and Management of Portfolios Law, 1995 (hereinafter: "the Advisory Law"); (hereinafter jointly – "securities laws") as well as the Economic Competition Law, 1988. Compliance with these laws is also handled by internal enforcement programs of securities laws and economic competition laws, respectively.

Compliance risk includes, inter alia, the issue of fairness, privacy protection laws, AML and terror financing and cross-border risk, as elaborated below.

The Bank has minimal risk appetite for compliance and regulatory risk, with regard to compliance with statutory provisions applicable to the Bank. Therefore, the Bank has determined that any deficiencies found in compliance with statutory provisions should be addressed by Bank units as a top priority. The Bank has specified a multi-annual work plan, which includes required action for reducing compliance risk.

The compliance and regulatory Risk Manager for the Bank is the Manager, Risks Management Division (CRO). The Compliance Officer is responsible for continuous management of this risk.

Compliance and regulation risk is managed by three lines of defense:

First line of defense – Includes the business units, in charge of identification, assessment, mitigation and control of compliance risk in processes and systems for which they are responsible.

Second line of defense – The Manager, Risks Management Division and CRO of the Bank serves as the person in charge of enforcement of securities laws and economic competition laws at the Bank and a Chief Compliance Officer, who report to the Chief Risks Officer. Their role is to assist the Bank's Board of Directors and Bank management in effectively managing compliance risk. The Compliance Department is responsible, among other things, for deployment of an organizational culture of compliance with procedures and with the law and fair dealing with customers across all Bank departments, for identification of various risks pertaining to regulation, fairness, privacy protection and others through the implementation of risk-based controls over the relevant departments and through analysis of findings provided by other departments.

Third line of defense – Internal Audit, which conducts independent audit of the first line of defense and of the Compliance Function, including review of the appropriateness and effectiveness of the Compliance Function, and review of compliance aspects in branch operations and in processes audited thereby.

The Bank maintains effective enforcement programs for securities law and for economic competition law, adapted for the Bank and its unique circumstances, as part of overall risks management at the Bank. This is designed to ensure compliance with securities law and economic competition law and to avoid violation thereof.

The Compliance Department maps compliance risks in various areas, takes action in order to reduce them and carries out training to deploy the compliance policy across the Bank. In order to ensure compliance with all statutory provisions, as noted above, the Compliance Officer maintains a control system including comprehensive control based on risk-based management.

The compliance risk is assessed using a methodology which reflects the likelihood of materialization of a breach event, the expected damage in case of breach, while taking into account the existing risk mitigators, such as: quality of work processes and procedures, compliance culture, control quality and so forth. The Bank manages and monitors quarterly changes in quantitative / qualitative benchmarks relevant for compliance risks management.

Computer-based tools are used in implementing compliance programs. Computer-based controls, including rules for monitoring activity, exception reports etc. are applied to Bank databases and are regularly developed in line with the work plan.

In 2024, the Bank's overall compliance risk level remained unchanged at Low-Medium. In view of the effects of the war, emphasis is placed on implementation of fair work processes with customers, with due consideration of the complexity and required sensitivity during this period. The Bank continues to acts to provide a response so as to enable service provision to all members of the public, in conformity with Proper Conduct of Banking Business Interim Directive 251 with regard to adjustment of Bank of Israel directives during war time, letters from the Supervisor of Banks and the AML Authority.

Cross-border risk

Cross-border risk is the risk of financial loss (including due to legal proceedings, fines or sanctions imposed by statutory authorities or others in Israel and in other countries) and of impact to reputation, arising from the Bank's failure to comply with statutory provisions originating in other countries – whether provisions binding on the Bank or provisions which are not binding, but failure to comply with them may cause the Bank to incur damage, or from overseas activities of Bank customers in contravention of any statutory provisions.

Cross-border risk includes, inter alia, risk of damage, including impact to reputation, due to lawsuits or other enforcement proceedings brought by authorities in other countries, with regard to foreign tax laws applicable to certain Bank customers, AML and terror financing laws, sanctions imposed by international bodies and foreign authorities or other laws. Cross-border risk also applies to the Bank's overseas affiliates, in activity with foreign-resident customers.

Cross-border risk includes the risk arising from obligations arising from US tax laws applicable to Bank Group operations outside of the USA (the Foreign Account Tax Compliance Act – "FATCA" and Qualified Intermediary – "QI"). This risk is also due to obligations stipulated by the Common Reporting Standard (CRS) issued by the OECD.

The Bank has zero appetite for cross-border risk. Therefore, the Bank has specified that any faults discovered with regard to cross-border risk would be addressed by Bank units as a top priority.

The cross-border Risk Manager for the Bank is the Manager, Risks Management Division, the CRO. The Compliance Officer is responsible for continuous management of this risk.

Cross-border risk is managed by three lines of defense:

First line of defense – Includes the Retail Division, the Corporate Division and the Finance Division, which are responsible for monitoring and reducing cross-border risk in their activity with relevant customers, international operations, which is responsible for overseas Bank affiliates through local compliance units at each affiliate.

Second line of defense – the Compliance Department under the Risks Management Division, which is responsible for deploying an organization-wide compliance culture with procedures and laws, for identification and assessment of cross-border risk, for delivering appropriate training and for specifying procedures. To this end, the Compliance Department is assisted by the Legal Division, the Human Capital and Resources Division which supports the implementation of processes and IT systems and the Technology Division, which develops computer-based tools for risk identification, monitoring and mitigation.

Third line of defense – Internal Audit, which conducts periodic audit of the management of cross-border risk.

The level of cross-border risk remained unchanged in 2024, at Low-Medium.

The Bank applies the statutory provisions for implementation of FATCA and CRS, and provides timely reports to the Israeli Tax Authority. The Bank is compliant with terms and conditions of the QI agreement with the IRS, and reported to the IRS during 2024. International entities, including OFAC (of the US Department of Treasury) and the European Union have imposed international sanctions on countries, organizations and individuals. As part of management of its international financial operations and maintaining proper business relations with correspondent banks, the Bank is compliant with these sanctions, even though they do not apply directly to the Bank. As part of management of cross-border risk, the Bank especially monitors and reviews any monetary transactions where any party to such transaction is located in a country / entity subject to international sanctions, which the Bank decided to adopt.

The Bank implements processes designed to improve the quality of risk management, including by revising procedures, automating work processes, specifying cross-border risk level for account, applying second line of defense controls, improving professional knowledge, including by delivering training, concentrating activity of foreign residents in specialized branches and specification of work routines in processes required for reporting under both FATCA and CRS. The Bank also monitors regulatory updates from relevant countries for the Bank and its affiliates, and implements them if applicable.

AML risk

AML risk is the risk of financial loss (including due to legal proceedings, penalties or sanctions imposed by authorities in Israel and in other countries) and impact to reputation, which the Bank may incur due to breach of various statutory provisions regarding the Bank's obligations with regard to AML. The Bank applies on a Group basis, with required changes, its policies in this area as well as statutory provisions, at its subsidiaries and branches in Israel and overseas.

The Bank regards itself as a partner in the international AML effort and takes part in the international effort against bribery and corruption, acting to identify, monitor and follow up on activities and customers that may be exposed to bribery and corruption. The Bank also avoids any activities opposed to the international sanctions regime of states and international bodies such as OFAC (of the US Department of Treasury) and of the European Union.

The Bank applies a risk-based approach to account opening and management, allocating resources in conformity with the risk level of the account and activity, reflected inter alia by enhanced controls and appropriate custom training.

The Bank has zero risk appetite with regard to AML risk. Therefore, the Bank has specified that any faults discovered with regard to AML risk would be addressed by Bank units as a top priority.

The AML Risk Owner for the Bank is the head of the Risk Management Division - the CRO. The Compliance Officer is responsible for continuous management of AML risk.

The Bank applies on a Group basis, with required changes, its policies in this area as well as statutory provisions, at its subsidiaries and overseas affiliates.

AML risk is managed by three lines of defense:

First line of defense – consists of branches and business units that apply real time regular controls to their operations.

Second line of defense – the Compliance Department of the Risks Management Division, which is responsible for applying appropriate controls, for deployment of relevant statutory provisions and for delivering training designed to improve knowledge on this subject.

Third line of defense – Internal Audit, which conducts independent audit of the first line of defense and of the Compliance Function, including review of the appropriateness and effectiveness of the Compliance Function, including review of controls in line with estimated risk level.

The Bank applies statutory provisions and regularly provides ordinary and extraordinary reports to the AML Authority. To this end, the Bank operates inter alia a computer system to identify extraordinary transactions and to monitor the processing of such reports.

The Compliance Department manages and monitors quarterly changes in relevant qualitative and quantitative benchmarks relevant for compliance risk management, and applies various controls to activity in various accounts, based on the risk profile thereof, concurrently with verification and improvement of data quality. The Department also provides ongoing advice to branches and business units, as well as delivering training customized for different Bank employees based on their role.

In addition, as part of bribery and corruption risk management, the Bank acts to identify customers that may be exposed to giving, receiving or brokering bribes, both during account opening and in the course of normal business operations.

The Compliance Department provides a semi-annual report to the Bank of Israel about exposure to compliance risk, in conformity with Reporting Regulation 825. In addition, the department reports to Bank management every quarter and submits annual reports to the Board of Directors with regard to implementation of the policy and reference to all risks and exposures at the Bank with regard to compliance. Furthermore, in special cases with implications for AML, the Compliance Officer immediately reports to the CRO, to the Bank President & CEO and to the Supervisor of Banks, as the case may be.

In view of the increase in business activity and further increased regulatory activity reflected, inter alia, in frequent publication of new directives, for which the Bank is preparing accordingly, intensive training and deployment activity continued, along with risk-focused controls, improvement of documents and classifications, and taking effective action to avoid recurrence of unusual events and compliance failures.

Terror financing risk

Terror financing risk is the risk of financial loss (including due to legal proceedings, penalties or sanctions imposed by authorities in Israel and in other countries) and impact to reputation, which the Bank may incur due to breach of various statutory provisions regarding the Bank's obligations with regard to terror financing.

The Bank has zero risk appetite with regard to terror financing risk. Therefore, the Bank has specified that any faults discovered with regard to terror financing risk would be addressed by Bank units as a top priority.

The Terror Financing Risk Owner for the Bank is the head of the Risk Management Division - the CRO. The Compliance Officer is responsible for continuous management of terror financing risk.

The Bank regards itself as a partner in the international anti-terror financing, acting to monitor and follow up on customer activities. The Bank also avoids any activities opposed to the international sanctions regime of OFAC (of the US Department of Treasury) and of the European Union.

International entities, including OFAC (of the US Department of Treasury) and the European Union have imposed international sanctions on countries, organizations and individuals. As part of management of its international financial operations and maintaining proper business relations with correspondent banks, the Bank is compliant with these sanctions, even though they do not apply directly to the Bank. As part of management of the risk, the Bank monitors and applies special reviews to any monetary transactions where any party to such transaction is a state, body or entity subject to international sanctions.

Terror financing risk is managed by three lines of defense:

First line of defense – consists of branches and business units that apply real time regular controls to their operations.

Second line of defense – the Compliance Department of the Risks Management Division, which is responsible for applying appropriate controls, for deployment of relevant statutory provisions and for delivering training designed to improve knowledge on this subject.

Third line of defense – Internal Audit, which conducts independent audit of the first line of defense and of the Compliance Function, including review of the appropriateness and effectiveness of the Compliance Function, including review of controls in line with estimated risk level.

For terror financing risk, the risk assessment is based, inter alia, on risk assessment conducted by the Bank, on continued risk-focused management, as reflected by revision of operating procedures and processes, including IT support and process streamlining, training and deployment activities along with risk-focused controls in the first and second lines of defense, and taking effective action to prevent recurrence of unusual events and compliance failures and strict control over banking activity.
Against the backdrop of the Iron Swords War, the Bank increased monitoring and handling of this matter, while bolstering controls over transactions and customers at risk.

Scope and key features of risks measurement system

The Bank has many measurement systems used to estimate all material risks to which the Bank is exposed, as well as IT systems to support risks monitoring and reporting, as stated below:

- Compliance risk management system – this system is used for risk management, control management, task monitoring and for management and monitoring of decisions and processes. The system allows for dynamic specification, execution and monitoring of processes and displays a current overview of work processes for each stage, in real time, as well as the Bank's compliance risks map.
- The AML system (MEA) is used to monitor unusual activity which gives rise to concern with regard to AML and terror financing. This system addresses the monitoring of transactions, review, debrief, transfer to the Compliance Department and, if needed, completing the processes by referring the case to the AML Authority. Reports generated by the system are in conformity with the AML Authority's new reporting directives (pattern-based reporting). This system has been deployed at all Bank branches, and operates with a regular computer interface between Bank branches and the Compliance Department.

Reputational risk

The Bank has mapped reputation risk as a material risk, because past events indicate that impact to the reputation of a financial institution may result in significant loss of value. Reputation risk is a stand-alone risk, but may also arise from materialization of other risks at the Bank, such as materialization of an operating risk event. Furthermore, impact to Bank reputation may bring about the materialization of other risks, in particular liquidity risk – with growing demand by customers to withdraw deposits.

The Bank has defined its risk appetite for reputation risk as minimal. In recent years, the Bank took action to put in place a framework for handling reputation risk. The Bank considers that this risk should be addressed based on similar principles to those used to address other risks, such as credit risk or market risk – even though this risk is considered harder to quantify. Therefore, similarly to other risks, the Bank's Board of Directors has created a dedicated policy document for addressing reputation risk, which specifies guidelines for risk management, risk appetite, risk measurement and ways to mitigate risk. Accordingly, the Bank incorporated reputation risk into its regular risks management processes, including the process for approval of new products or activities and in self-assessment processes conducted by the Bank and has put in place a framework for regular measurement of this risk. The Bank emphasizes creation of a reporting chain and the required activity under stress conditions, in order to mitigate the impact of such risk, should it materialize. This activity requires identification of risk materialization at its early stages, in order to allow for qualitative and quantitative tools to be applied as early as possible, in order to address this risk. The policy refers to all Bank subsidiaries and stipulates mandatory reporting and the required actions in case of an event classified as a reputation event. The Bank regularly coordinates with Bank Yahav on this matter.

The Reputation Risk Manager is the Manager, Marketing, Promotion and Business Development Division at the Bank.

Reputation risk is managed in conformity with the policy on three levels: In advance (under normal conditions), in real time (alert condition) and in retrospect.

Bank policy also defines the roles of the Risk manager and stipulates how the risk should be addressed under normal conditions and in case of a stress event. The Risk Manager heads the Reputation Risk Committee, which regularly convenes quarterly and as needed, in case of concern about materialization of a stress event. The Committee routinely discusses the outcome of continuous monitoring of this risk which is conducted, inter alia, based on internal and external information sources, through surveys and studies, online discourse, media review and reports by other Risks Managers at the Bank. The work process under stress conditions, i.e. in case of an event which may impact reputation, is incorporated in a specific reporting and action procedure. The objective of this procedure is to define how information is located, the reporting chain, including declaration of a reputation event, how to act during the event and how to declare the event ended, including debriefing and other assessment to review the impact of the event on Bank image, once the event has ended. The Bank has also specified, as part of its business continuity plan, the creation of a media command post, headed by the Risk Manager, which would allow the Bank to handle reputation risk in case of emergency.

The Bank routinely measures its reputation risk in the capital market, in the public and among customers and the business community. This measurement is based on specific quarterly studies which review public opinion (Bank customers and those of other banks), on monthly monitoring of online discourse, on satisfaction surveys among Bank customers etc. Reports with regard to reputational risk are sent to Bank management and to the Board of Directors in the quarterly Risks Document – as is the case for all risks mapped by the Bank.

Strategic business risk

Strategic business risk – is the risk, in real time or in future, to Bank profits, capital, reputation or status, which may arise from erroneous business decisions, improper deployment of decisions or inappropriate alignment of the Bank to changes in the business environment in which it operates. The Bank is preparing for these changes by, inter alia, adapting the banking production functions through, inter alia, increased investment in technology, so as to maintain the Bank's position as an advanced, human bank. This is material risk requiring risk management measures to be applied, assessment and early identification of events which may preclude implementation of the strategy.

On April 26, 2021, the Bank's Board of Directors approved a strategic 5-year plan for 2021-2025, based on the following:
- Position the Bank as a key player in business banking, based on supporting action including: set up operations for investments in non-banking corporations, lead large and complex transactions and expand the Bank's international operations at its branches in London and in the USA in areas focused on business banking;
- Establish leadership position of the Bank Group among households: Maintain the leadership position in the mortgage market while introducing innovations in products and processes, and increasing synergies with commercial operations, expand operations among target populations and set up a desk for unique consumer credit products;
- Provide personal, human banking services supported by advanced digital technology, including optimal combination of human and digital channels, with human service by expert bankers, including digitally, in accordance with customer choice and needs, as well as offering personalized value propositions across all channels, which are customized for customer needs.
- Adapt the operational model to future challenges and improve operational efficiency, including through relocating Bank headquarters to the central campus in Lod, adapt the branch structure to future challenges, optimize real estate, automate bank operations and streamline the work environment.
- Leverage the Union Bank merger to create operational and business synergy and to realize economies of scale.

The strategic plan for 2021-2025 is designed to achieve the following targets:
- Achieve in 2025, net profit return on equity attributable to equity holders of 14% on average equity, as well as double-digit, growing and stable return over the term of the strategic plan; these rates are based on the ratio of Tier I equity to risk components for the Bank at the minimum set by the Supervisor of Banks plus appropriate margin;
- Growth in bank operations to result in increased market share of the Bank in the Israeli banking system;
- Grow revenues at an annual average rate of 8% (although non-linear), while controlling the average annual expenses at a 5% growth rate (also non-linear) over the term of the strategic plan;
- Maintain high operating efficiency and leverage economies of scale due to the Union Bank merger, to achieve a cost-income ratio lower than 50% in 2025.
- Under the strategic plan, the Board of Directors shall monitor execution of the plan, in order to consider potential increase of the dividend rate, from 40% of net profit attributable to Bank shareholders, up to 50% of net profit, upon conclusion of the Union Bank merger process; This would be subject to Bank compliance with the ratio of Tier I capital to risk components, as required by the Supervisor of Banks, maintaining appropriate margins and subject to approval by the Supervisor of Banks.

The Bank is acting in conformity with five-year strategic plan for 2021-2025. Bank results in 2024 indicate that the Bank has surpassed the objectives set in the strategic plan.

The Strategic Business Risk Owner is the President & CEO; based on his guidance, management periodically reviews the implementation of the strategy: Monitoring of developments of external factors which may affect the Bank's strategic risk, including regulatory, economic or technology developments which affect the strategy and initiating annual work plans derived from and in conformity with the strategic plan. In addition, the Financial Information and Reporting Division and the Risks Management Division regularly and independently monitor strategic business risk from different control aspects, primarily the following: achievement of targets, risk mapping and identification, stress testing, threat tests and continuous monitoring of the risk profile in view of the Bank's risk appetite. In addition to continuous monitoring of the implementation of work plans and aligning them with the strategic outline, the Bank also monitors developments of external factors which may impact the Bank's strategic business risk. The work plans of Bank divisions are adapted, when needed, to the changing business environment in order to achieve business targets and the strategic outline. The Bank is prepared for emergencies so as to reduce the impact to the Bank's business and strategic plan, should extreme economic or geo-political conditions evolve.

As noted above, developments in the business environment which may impact strategic risk include increased local and global geo-political tension, its impact on local and global economic activity, effect of inflation and higher interest rates, which raised the cost of borrowing, technological developments in the world of finance and changes to consumer preferences, the impact of regulatory provisions in core areas of banking operations.

This information constitutes forward-looking information, as defined in the Securities Law, 1968, based on assumptions, facts and data (hereinafter jointly: "assumptions") brought before the Bank’s Board of Directors. These assumptions may not materialize due to factors which are not solely controlled by the Bank.

Environment, society and governance (ESG) risks

The Group incorporates ESG aspects in its business strategy, maintains regular communication with all stake holders and manages diverse risks arising from its operations from environments, social and corporate governance aspects. In 2022, the Group formulated policy on identification, management and control of ESG risk at the Bank.

The Board of Directors supervises ESG issues through Board committees or by the Board of Directors Planum, including: Climate change, environmental and social risks in lending and investments, handling customer complaints, financial inclusion and so forth. The Board of Directors and the Risks Management Committee discuss the Bank's ESG risks as part of the quarterly Risks Document. Moreover, the Risks Management Committee and the Board of Directors receive the environmental risks and climate risks report and discuss ESG risks.

The Bank has a steering committee, headed by the Manager, Human Capital and Resources Division and composed of different division managers, designed to lead policy, activity, control and reporting as part of promoting ESG across all Bank operations, for optimal management of identified ESG risks.

In recent years, global awareness of the potential impact of climate change for ecological systems, for society and for the global financial system has been growing. These effects are expected to continue in the coming years, to increase and to pose a key challenge to countries around the world. Bank Mizrahi Tefahot, being a leader in the Israeli banking system, is preparing for climate change and the resulting implications thereof. The Bank operates in conformity with Bank of Israel requirements and based on generally accepted global practices, in order to make the required adjustments to its operations in a professional, responsible manner – so as to benefit, inter alia, its stake holders and to ensure stability of the Bank and of the Israeli economy. The Bank acts to expand preparations for risks that may arise from climate change, in conformity with revised requirements and with evolving maturity level of global practices and of the Israeli economy. This is done while discharging its responsibility to provide optimal service to Bank customers.

In the past year, the Bank has published its TCFD report (Task Force on Climate-Related Financial Disclosures), presenting Bank assessments of effective management of climate risk. This report was created in conformity with the generally accepted global standard for such reporting. The report provides an extensive overview of all processes undertaken at the Bank over the past two years, so as to prepare for climate-related aspects, in conformity with regulatory requirements in Israel. These processes include, inter alia, creation of designated forums for managing this area, development of mechanisms for classification and assessment of climate risks, development of mechanisms for risk identification, management measurement and mitigation, as well as development of custom products to harness business opportunities arising from climate change and preparation there for.

As from the financial statements with respect to the fourth quarter of 2020, the Bank includes environmental risk, and in particular climate risk, on the list of emerging risks. At this stage it is too early to assess the potential long-term impact of climate change on the Bank.

In 2025, the Bank intends to further develop its capabilities with regard to ESG risks and in particular climate risks, with due notice to developments in global and local banking regulation and developments in the economic and environmental arena in Israel and elsewhere.

On June 17, 2024, the Bank Supervisor published an update to Proper Bank Management Directive 345 concerning guidelines for the effective management of climate-related financial risks. In accordance with the circular, it was decided to defer the start date of the directive. The directive will come into effect starting June 12, 2026 (in lieu of the original date, June 12, 2025).

For objectives and strategies with regard to environment and climate, see "Environmental risks" on the Report by the Board of Directors and Management.

Remuneration

In December 2023, the General Meeting of Bank shareholders approved, after approval by the Board of Directors and recommendation by the Remuneration Committee, the officer remuneration policy at the Bank (hereinafter: "officer remuneration policy"), effective for 2024-2026 as from January 1, 2024. The remuneration policy is in conformity with the Corporate Law, 1999, the Remuneration of Officers in Financial Corporations Law (Special Permission and Non-allowance of Expenses for Tax Purposes with Respect to Excessive Remuneration), 2016 ("the Executive Remuneration Law") and Proper Conduct of Banking Business Directive 301A "Remuneration".

In December 2023, the Bank's Board of Directors approved, after receiving the recommendation from the Remuneration Committee, a remuneration policy for 3 years for all Bank employees, other than officers who are subject to the remuneration policy for Bank officers, as noted above. The remuneration policy for all Bank employees discusses remuneration terms of key employees at the Bank and those of other managers at the Bank and of other Bank employees for 2024-2026.

Name, composition and authority of entity supervising remuneration

The Board of Directors' Remuneration Committee is the entity which supervises remuneration. The Committee consists of 4 Board members. All Board members serving on the Committee are external Board members, and all external Board members are members of the Remuneration Committee (in conformity with the Companies Law and with Proper Conduct of Banking Business Directive 301 "Board of Directors").

The Remuneration Committee formulates recommendations for the Board of Directors on remuneration policy for officers and other Bank employees. Moreover, the Remuneration Committee confirms the contracting terms of the Bank with its senior officers, including with regard to their remuneration (including officer liability insurance, indemnification and waiver), as well as the individual targets to be specified by the Bank President & CEO and their assessments on this matter (and of the Chairman of the Board of Directors and recommendation of the Audit Committee with regard to the Internal Auditor, respectively).

External consulting with regard to remuneration processes

For approval of the remuneration policy, the Remuneration Committee was assisted by various advisors: legal advice and advice on corporate governance aspects.

Remuneration policy scope

In conformity with the officer remuneration policy, the Remuneration Committee and the Board of Directors approved an officer remuneration plan.

Based on the remuneration principles specified by the Remuneration Committee and adopted by the Board of Directors, as reflected in the officer remuneration policy – the Remuneration Committee recommended and the Board of Directors approved in December 2023 a remuneration policy for all Bank employees other than officers ("the remuneration policy for all Bank employees").

The remuneration policy for all Bank employees applies Group-wide; it also applies to overseas affiliates of the Bank, to Bank subsidiaries other than Bank Yahav – whose remuneration policy has been communicated to the Bank.

Employees considered senior officers and other key employees

The officer remuneration policy distinguishes between business officers and gatekeepers, for whom an "additional fixed component" was specified, inter alia – which is not contingent on performance – and individual performance benchmarks were specified – which are independent of the business which they supervise.

The remuneration policy for all Bank employees specifies remuneration terms of all key employees at the Bank, those of senior managers and other managers at the Bank and of other Bank employees for 2024-2026.

The group of key employees at the Bank, other than officers, consists in 2024 of 50 managers, of which 19 managers in subsidiaries (other than Bank Yahav).

Planning and structure of remuneration policy; key attributes and objectives of remuneration policy

The objective of the officer remuneration policy and of the remuneration policy for all Bank employees, is to ensure that remuneration of Bank employees, including key employees, would be consistent with the Bank's risks management framework, with its long-term objectives, with the Bank's strategic plan and its control environment, as well as with actual employee performance over the short, medium and long terms. Accordingly, the goals underlying the remuneration policy were: create an incentive structure for Bank employees which maintains a proper balance between fixed and variable remuneration components and which promotes effective, well established risk management which does not encourage risk taking beyond the Bank's risk appetite and allows the Bank to maintain a solid capital base; align remuneration incentives payable to Bank employees with the Bank's strategic plan, with long-term objectives of the Bank, with the Bank's results over time and with actual contribution of Bank employees to achieving such Bank objectives; alignment of Bank contracting with Bank employees other than officers, in order to create balanced conditions which do not jeopardize the robustness and stability of the Bank, as well as preserving senior Bank employees and ensuring, in as much as possible, the Bank's capacity to recruit high-quality managers in future, allowing for organization-wide considerations such as cost of remuneration and desired remuneration gaps between various ranks of Bank employees, as well as the competitiveness in the banking sector, the Bank's size, scope of operations and nature of its business.

Remuneration components of Bank employees include fixed and variable remuneration, as customary at the Bank, as well as any other benefit, payment or commitment to make a payment, provided with respect to their employment at the Bank.

The great majority of Bank executives, including key employees, are employed by individual employment contract. As for officers, their terms of office and employment include waiver and indemnification and officer liability insurance, as customary at the Bank.

Remuneration of employees involved with risk and compliance is not dependent on the business results of the business areas whose operations they monitor, audit or supervise. Terms of office and employment of the Chief Compliance Officer are brought for approval by the Board of Directors, after approval by the Remuneration Committee, as stipulated by Proper Conduct of Banking Business Directive 301A. Furthermore, variable remuneration of managers in charge of the trading room, back office staff and staff involved in risk management, is not dependent on operating results of the trading room and is not derived from remuneration of trading room staff.

Risks

Annual remuneration processes and Key Performance Indicators (KPI) of senior managers at the Bank, which are challenged by the Bank's Chief Risks Officer, include reference to issues related to risk management, with emphasis on compliance risk and mitigation measures for such risk within the manager's scope of activity.

Link between performance and remuneration; long-term performance; variable remuneration

Variable remuneration for key employees and other managers includes a monetary bonus and long-term equity-based remuneration. Variable remuneration is designed to align the interests of managers and key employees with those of the Bank and to reinforce the link between the Bank's overall performance and the key employee's contribution to achievement of such performance, and the key employee's remuneration – with consideration to the Bank's risk profile.

Variable remuneration is objective-dependent and performance-dependent and as such, encourages the senior executives, including the key employees, to generate economic value and to promote the Bank's medium-term and long-term objectives, while maintaining the Bank's risks management framework and risk appetite. Therefore, performance-based remuneration payable to key employees is contingent on Bank performance in the medium and long terms, considering the Bank's strategic plan – but would not encourage taking risks beyond the Bank's risk appetite and would maintain a proper balance between fixed and variable remuneration components.

Equity-based remuneration is typically awarded by way of options, as described in the outline of offering to employees, as approved by the Board of Directors on May 29, 2024, after approval by the Remuneration Committee. As well as a capped monetary bonus, such that the total value of variable remuneration would not exceed 100% of the key employee's total fixed remuneration, except under special conditions, where the maximum variable remuneration may not exceed 200% of the fixed remuneration. The Bank’s Board of Directors also stipulated that the maximum variable remuneration for officers who are gatekeepers would not exceed 80% of fixed remuneration and that such officers would be eligible for an additional bonus equal to two months' salary, which constitutes fixed remuneration pursuant to the remuneration policy.

Key employees' eligibility for variable remuneration is contingent on fulfillment of all threshold conditions specified in the officer remuneration policy, in line with the officer remuneration policy, i.e.: on the Bank's total capital adequacy ratio and Tier I equity adequacy ratio, in conformity with the Bank's annual financial statements for that year, would not be lower than the minimum ratios stipulated by Bank of Israel directives and under special circumstances, should the rate of return be lower than the minimum stipulated or to be stipulated in Bank of Israel directives, but the second pre-requisite has been fulfilled, a special bonus of up to two monthly salaries may be awarded.

Eligibility of key employees and other senior executives to a monetary bonus is based on quantitative, company-wide criteria identical to those applicable for officers: return on equity, return on Bank shares relative to benchmark, operating efficiency ratio and average ratio of core deposits. In addition, eligibility of senior managers, including key employees for a monetary bonus is based on qualitative criteria, consisting of individual performance benchmarks (specified annually, based on performance targets according to the work plan for each year) and which include objectives related to risks management and compliance and objectives with regard to risks handled thereby, depending on their occupation, as well as evaluation by their supervisors. In addition, a threshold was specified for the evaluation criteria, below which the key employee would not be eligible for any annual monetary bonus. The individual performance benchmarks specified for managers, related to risk control and compliance, are related to development and implementation of risks monitoring mechanisms and to development and implementation of effective alerts to deviation from the definitions specified by Bank management and Board of Directors, as well as supervision and control of implementation of required statutory provisions, as the case may be. Individual performance benchmarks specified for managers involved in audits are related to the scope and quality of audits performed under their supervision with reference to coverage of major risk factors in their field, implementation of a clear professional policy in support of Bank objectives and deployment of high professional standards. These performance benchmarks are not contingent on performance of Bank business lines and units which they supervise or audit, as the case may be.

Eligibility of key employees for options, for each annual lot, would be determined based on the four company-wide benchmarks, as described above (with respect to officers other than the Bank President & CEO or the Chairman of the Board of Directors). In conformity with the officer remuneration policy, eligibility of officers to receive options would be determined based on company-wide benchmarks, with a weighting of up to 40% for gatekeepers, and up to 55% for other officers, as well as on individual performance targets, with a weighting of up to 60% for gatekeepers and up to 45% for other officers.

The Bank has specified steps ("minimum achievement", "target achievement", "maximum achievement"), the achievement of which would confer eligibility to receive variable remuneration at different rates.

In conformity with the remuneration policy, a key employee must reimburse, including by way of offset, any variable remuneration paid them – if paid based on data which turned out to be erroneous and were restated on the Bank's (consolidated) financial statements within three years following the end of the year for which the variable remuneration was paid, but no later than three years after termination of their employment by the Bank.

Furthermore, the remuneration policy stipulates – and option offerees have committed accordingly – that no private hedging arrangements may be entered into which would eliminate the effect of risk-sensitivity inherent in their remuneration.

For officers not employed by individual employment contract and for all other Bank employees – the monetary bonus consists of a general bonus and individual bonus, based on their department and with due consideration to objectives for revenues, risk management, compliance, compliance with regulatory requirements and internal audit findings, public complaints, service quality to customers, individual contribution of the employee and the supervisor's opinion.

The terms of office or employment of Bank employees include fixed and variable remuneration, as customary at the Bank, as well as retirement terms and any other benefit, payment or commitment to make a payment, provided with respect to the aforementioned office or employment.

Below are details of remuneration paid (NIS in millions):

		2024	
		Senior Officers	Other key employees
Fixed remuneration	Employee headcount	16	50
	Total fixed remuneration	31	51
	Of which: Cash-based	31	51
	Of which: Deferred	-	-
	Of which: Shares or other share-based instruments	-	-
	Of which: Deferred	-	-
	Of which: Other forms	-	-
	Of which: Deferred	-	-
Variable remuneration	Employee headcount	16	50
	Total variable remuneration	18	27
	Of which: Cash-based	9	17
	Of which: Deferred	-	4
	Of which: Shares or other share-based instruments	9	10
	Of which: Deferred	9	10
	Of which: Other forms	-	-
	Of which: Deferred	-	-
Total remuneration		**49**	**78**

		2023	
		Senior Officers	Other key employees
Fixed remuneration	Employee headcount	15	41
	Total fixed remuneration	29	43
	Of which: Cash-based	29	43
	Of which: Deferred	-	-
	Of which: Shares or other share-based instruments	-	-
	Of which: Deferred	-	-
	Of which: Other forms	-	-
	Of which: Deferred	-	-
Variable remuneration	Employee headcount	14	41
	Total variable remuneration	16	25
	Of which: Cash-based	8	14
	Of which: Deferred	-	1
	Of which: Shares or other share-based instruments	8	11
	Of which: Deferred	8	11
	Of which: Other forms	-	-
	Of which: Deferred	-	-
Total remuneration		**45**	**68**

Below is information about special payments (NIS in millions):

Special payments	Guaranteed bonuses		Signing bonuses		Severance pay	
	Number of employees	Total remuneration	Number of employees	Total remuneration	Number of employees	Total remuneration
	2024					
Senior Officers	-	-	-	-	-	-
Other key employees	-	-	-	-	-	-
	2023					
Senior Officers	-	-	-	-	-	-
Other key employees	-	-	-	-	-	-

Below is information about deferred remuneration (NIS in millions):

Deferred remuneration and retained remuneration	Total unpaid amount of deferred remuneration balance	Of which: Total outstanding remuneration payable that is held and subject to retroactive adjustments, explicit or implicit	Total amount of revision made during the year due to explicit retroactive adjustments	Total amount of revision made during the year due to implicit retroactive adjustments	Total deferred remuneration paid out in the reported year
	2024				
Senior Officers					
Cash	-	-	-	-	-
Share-based	24	24	-	-	2
Cash-based instruments	-	-	-	-	-
Other	-	-	-	-	-
Other key employees					
Cash	9	9	-	-	1
Share-based	31	31	-	-	3
Cash-based instruments	-	-	-	-	-
Other	1	1	-	-	1
Total	**65**	**65**	-	-	**8**
	2023				
Senior Officers					
Cash	1	1	-	1	1
Share-based	17	17	-	17	17
Cash-based instruments	-	-	-	-	-
Other	2	2	-	2	2
Other key employees					
Cash	5	5	-	5	5
Share-based	23	23	-	23	23
Cash-based instruments	-	-	-	-	-
Other	2	2	-	2	2
Total	**50**	**50**	-	**50**	**50**

Addendum A – Links between financial statements and supervisory exposures

Differences between accounting consolidation basis and supervisory consolidation basis, and mapping of financial statements by supervisory risk categories (NIS in millions):

						As of December 31, 2024
		On-balance sheet balances of items:				
	On-balance sheet balances as reported on published financial statements(1)	Subject to credit risk framework	Subject to counter-party credit risk framework	Subject to securitization framework	Subject to market risk framework(2)	Not subject to capital requirements, or subject to deduction from capital base
Assets						
Cash and deposits with banks	82,644	82,220	422	-	-	2
Securities	28,491	20,243	-	-	8,248	-
Securities borrowed or purchased in resale agreements	264	264	-	-	-	-
Loans to the public	362,094	355,865	6,229	-	-	-
Provision for credit losses	(4,113)	(782)	-	-	-	(3,331)
Loans to the public, net	357,981	355,082	6,229	-	-	(3,331)
Loans to Governments	318	318	-	-	-	-
Investments in associated companies	263	263	-	-	-	-
Buildings and equipment	1,852	1,852	-	-	-	-
Intangible assets and goodwill	117	-	-	-	-	117
Assets with respect to derivatives	5,526	-	5,526	-	3,899	-
Other assets	8,187	8,187	-	-	-	-
Total assets	485,643	468,430	12,177	-	12,147	(3,212)
Liabilities						
Deposits from the public	393,383	-	366	-	-	393,383
Deposits from banks	2,599	-	673	-	-	1,926
Deposits from the Government	49	-	45	-	-	49
Securities loaned or sold in re-purchase agreements	-	-	-	-	-	-
Bonds and subordinated notes	36,916	-	-	-	-	36,916
Liabilities with respect to derivatives	5,123	-	5,123	-	4,106	-
Other liabilities	14,844	-	-	-	-	14,844
Total liabilities	452,914	-	6,207	-	4,106	447,118

						As of December 31, 2023
		On-balance sheet balances of items:				
	On-balance sheet balances as reported on published financial statements(1)	Subject to credit risk framework	Subject to counter-party credit risk framework	Subject to securitization framework	Subject to market risk framework(2)	Not subject to capital requirements, or subject to deduction from capital base
Assets						
Cash and deposits with banks	86,550	85,810	738	-	-	2
Securities	23,071	15,575	-	-	7,496	-
Securities borrowed or purchased in resale agreements	106	106	-	-	-	-
Loans to the public	329,415	326,447	2,968	-	-	-
Provision for credit losses	(4,069)	(1,064)	-	-	-	(3,005)
Loans to the public, net	325,346	325,383	2,968	-	-	(3,005)
Loans to Governments	480	480	-	-	-	-
Investments in associated companies	242	242	-	-	-	-
Buildings and equipment	1,531	1,531	-	-	-	-
Intangible assets and goodwill	148	-	-	-	-	148
Assets with respect to derivatives	6,282	-	6,282	-	6,066	-
Other assets	4,448	4,448	-	-	-	-
Total assets	448,204	433,575	9,988	-	13,562	(2,855)
Liabilities						
Deposits from the public	358,553	-	366	-	-	358,553
Deposits from banks	4,571	-	673	-	-	3,898
Deposits from the Government	71	-	45	-	-	71
Securities loaned or sold in re-purchase agreements	-	-	-	-	-	-
Bonds and subordinated notes	37,070	-	-	-	-	37,070
Liabilities with respect to derivatives	7,367	-	7,367	-	6,123	-
Other liabilities	11,869	-	-	-	-	11,869
Total liabilities	419,501	-	8,451	-	6,123	411,461

Differences between accounting consolidation basis and supervisory consolidation basis, and mapping of financial statements by supervisory risk categories (NIS in millions):

Link between the balance sheet and supervisory capital components (NIS in millions):

	Consolidated supervisory balance sheet	
	As of December 31	
	2024	2023
	NIS in millions	
Assets		
Cash and deposits with banks	82,644	86,550
Securities	28,491	23,071
Of which: Investments in equity of financial corporations, not exceeding 10% of share capital of each financial corporation	-	-
Of which: Investments in equity of financial corporations, exceeding 10% of share capital of each financial corporation, not exceeding the deduction threshold	-	-
Of which: Other securities	28,491	23,071
Securities borrowed or purchased in resale agreements	264	106
Loans to the public	362,094	329,415
Provision for credit losses	(4,113)	(4,069)
Of which: Group provision for credit losses included in Tier II	(3,331)	(3,005)
Of which: Provision for credit losses not included in regulatory capital	(127)	(381)
Loans to the public, net	357,981	325,346
Loans to Governments	318	480
Investments in associated companies	263	242
Of which: Investments in equity of financial corporations, exceeding 10% of share capital of each financial corporation, not exceeding the deduction threshold	3	2
Of which: Investments in other associated companies	260	240
Buildings and equipment	1,852	1,531
Intangible assets and goodwill	117	148
Of which: Goodwill	87	87
Of which: Other intangible assets	30	61
Assets with respect to derivatives	5,526	6,282
Other assets	8,187	4,448
Of which: Deferred tax assets	2,311	2,327
Of which: Deferred tax assets, other than those arising from temporary differences	-	-
Of which: Deferred tax liability with respect to intangible assets	-	-
Of which: Other deferred tax assets	2,311	2,327
Of which: Excess deposit over provision	-	-
Of which: Other additional assets	5,876	2,121
Total assets	485,643	448,204

Link between the balance sheet and supervisory capital components (NIS in millions) – Continued:

	Consolidated supervisory balance sheet	
	As of December 31	
	2024	2023
	NIS in millions	
Liabilities and Equity		
Deposits from the public	393,383	358,553
Deposits from banks	2,599	4,571
Deposits from the Government	49	71
Securities loaned or sold in re-purchase agreements	-	-
Bonds and subordinated notes	36,916	37,070
Of which: Subordinated notes not recognized as regulatory capital	94	272
Of which: Subordinated notes recognized as regulatory capital	5,568	5,205
Of which: Qualifying as supervisory capital components	5,568	5,205
Of which: Not qualifying as regulatory capital components and subject to transitional provisions	-	-
Liabilities with respect to derivatives	5,123	7,367
Of which: With respect to internal credit risk	11	14
Other liabilities	14,844	11,869
Of which: Deferred tax liability arising from retirement	-	-
Total liabilities	452,914	419,501
Equity attributable to shareholders of the banking corporation	31,292	27,461
Of which: Supervisory capital	31,143	27,463
Of which: Ordinary share capital	3,572	3,556
Of which: Surpluses	27,782	24,196
Of which: Cumulative other comprehensive loss	(214)	(408)
Of which: Losses with respect to adjustments with respect to employee benefits	-	(54)
Of which: Unrealized gains from adjustment to fair value of available-for-sale securities	(228)	(356)
Of which: Net losses from cash flow hedges	5	4
Of which: Net losses from translation adjustments of financial statements	(2)	(2)
Of which: Capital reserves	153	119
Of which: Preferred share capital	-	-
Of which: Qualifying as supervisory capital components	-	-
Of which: Not qualifying as regulatory capital components and subject to transitional provisions	-	-
Of which: Other equity instruments	-	-
Of which: Qualifying as supervisory capital components	-	-
Of which: Not qualifying as regulatory capital components and subject to transitional provisions	-	-
Non-controlling interests	1,437	1,242
Of which: Non-controlling interests attributable to Tier I shareholders' equity	589	567
Of which: Non-controlling interest attributable to additional Tier I capital	-	-
Of which: Non-controlling interests attributable to Tier II capital	-	-
Of which: Non-controlling interests not attributable to regulatory capital	848	675
Total shareholders' equity	32,729	28,703
Total liabilities and equity	485,643	448,204

Key sources for differences between supervisory exposure amounts and carrying amounts on the financial statements (NIS in millions):

	As of December 31, 2024				
		Items subject to:			
	Total	Credit risk framework	Counter-party credit risk framework	Securitization framework	Market risk framework
Carrying amount of assets according to supervisory consolidation basis	485,643	465,218	12,177	-	8,248
Carrying amount of liabilities according to supervisory consolidation basis	452,914	-	6,207	-	-
Total net amount according to supervisory consolidation basis	32,729	465,218	5,970	-	8,248
Off-balance sheet amounts	134,565	40,402	-	-	-
Differences caused by potential future exposure	7,442	-	7,442	-	-
Differences caused by differences in offset rules	-	-	-	-	-
Differences arising from variable cash collateral in derivatives operations	-	-	-	-	-
Differences caused by securities provided as collateral	-	-	-	-	-
Differences due to balances not subject to capital requirements or subject to deduction from capital base	3,212	3,212	-	-	-
Other differences	57	-	57	-	-
Exposure amounts taken into account for supervisory purposes	630,919	508,832	19,676	-	8,248

	As of December 31, 2023				
		Items subject to:			
	Total	Credit risk framework	Counter-party credit risk framework	Securitization framework	Market risk framework
Carrying amount of assets according to supervisory consolidation basis	448,204	430,720	9,988	-	7,496
Carrying amount of liabilities according to supervisory consolidation basis	419,501	-	8,451	-	-
Total net amount according to supervisory consolidation basis	28,703	415,145	1,537	-	7,496
Off-balance sheet amounts	114,340	33,509	-	-	-
Differences caused by potential future exposure	6,290	-	6,290	-	-
Differences caused by differences in offset rules	-	-	-	-	-
Differences arising from variable cash collateral in derivatives operations	-	-	-	-	-
Differences caused by securities provided as collateral	-	-	-	-	-
Differences due to balances not subject to capital requirements or subject to deduction from capital base	2,855	2,855	-	-	-
Other differences	40	-	40	-	-
Exposure amounts taken into account for supervisory purposes	571,728	467,084	16,317	-	7,496

Glossary and index of terms included on the risks report

Below is a summary of terms included on the Risks Report:

Terms with regard to risk management and capital adequacy at the Bank

B	**Back testing** – A process for assessment of appropriateness of model results, which includes a comparison of model forecasts and actual results.
	Basel – Basel II / Basel III – A framework for assessment of capital adequacy and risk management, published by the Basel Committee on Bank Supervision.
C	**Counter-party risk** – The risk that the other party to a transaction would be in default before final settlement of cash flows in the transaction
	CRM – Credit risk mitigation – Methods for mitigating credit risks, such as: Insuring credit exposure through a guarantee or a deposit
	CVA – Credit Valuation Adjustment risk – CVA is the component of the of a derivative, which accounts for the credit risk of the counter-party to the transaction. CVA risk is the risk of loss from revaluation to market value due to expected counter-party risk for over-the-counter (OTC) derivatives. This means loss due to impairment of fair value of derivatives, due to increase in counter-party credit risk (such as: lowered rating).
E	**EVE** – Economic Value of Equity – The economic value approach used to analyze and assess the effect of changes in interest rates on the fair value of assets, liabilities and off-balance sheet positions of the Bank.
	Expected Shortfall VAR – A model which estimates the average loss for the VAR model, beyond the confidence level specified in the VAR model.
I	**ICAAP** – Internal Capital Adequacy Assessment Process by the Bank. The process includes, among other things, setting capital targets, capital planning processes and assessment of the status of capital under a range of stress scenarios. This process is part of Pillar 2 of the Basel directive.
K	**KPI** – Key Performance Indicators – used as a tool to formulate insights about the status of process execution across the Bank.
L	**Loan to Value Ratio (LTV)** – The ratio between the approved facility when extended and the asset value.
M	**Minimum capital -** The ratio represents the minimum supervisory capital ratios which the Bank is required to maintain, pursuant to requirements set forth in Proper Conduct of Banking Business Directive 201.
P	**Pillar 2** – The second pillar of the Basel II document, referring to the supervisory review process. This part consists of the following underlying principles: The Bank shall conduct an ICAAP, as defined above. The Supevisor of Banks shall conduct a process to assess the bank's capital adequacy assessment process, and its ability to monitor and comply with regulatory capital ratios. The bank is expected to operate above the minimum capital ratios which were set out.
	Pillar 3 – The third pillar of the Basel II document, designed to promote market discipline by developing a set of disclosure requirements that would allow market participants to assess the capital, risk exposure and risk assessment processes, and accordingly – to assess the bank's capital adequacy.
R	**Risk assets** – These consist of , operational risk , calculated using the standard approach as stated in Proper Conduct of Banking Business Directives 201-211.
	Risks document – A document which concisely presents the Bank's risk profile, in order to allow the Board of Directors to monitor action taken by management and to ensure that such action is in line with the risk appetite and with the risks management framework approved by the Board of Directors. The risks document is reported and presented to the Board of Directors quarterly.
S	**Standard approach** – An approach used to calculate the required capital with respect to , market risk or operational risk. The capital allocation is calculated by a formula based on supervisory assessment components, as specified by the Supervisor of Banks.
	Stress tests – Term covering multiple methods designed to assess the financial standing of a banking corporation under a stress scenario.
	Stressed VAR – Estimate of the Value at Risk (VAR) based on historical data which describe a relevant crisis period.
	Subordinated notes – Obligatory notes whose rights are subordinated to claims by other Bank creditors, except for other obligatory notes of the same type.
	Supervisory (total capital) – Supervisory capital consists of two tiers: Tier I capital, which includes common Tier I capital and additional Tier I capital. Tier II capital. As defined in Proper Conduct of Banking Business Directive 202 "Capital measurement and adequacy – Supervisory capital".
T	The Bank shall conduct an ICAAP, as defined above. The Supevisor of Banks shall conduct a process to assess the bank's capital adequacy assessment process, and its ability to monitor and comply with regulatory capital ratios. The bank is expected to operate above the minimum capital ratios which were set out.
V	**VAR** – A model used to assess total exposure to various market risks. The VAR (Value at Risk) arising from the model is a statistical estimate of the maximum potential loss the Bank may suffer due to materialization of market risks in a given period at a pre-determined statistical confidence level.

Banking and finance terms

A	**Average duration** – Average duration of bonds. Measured in years, by weighting principal and interest payments for the bond over its life, through final maturity. The average duration of bonds reflects the financial instrument's sensitivity to changes in interest rates. Average duration is calculated as the ratio of weighted average payments to price of the bond.
B	**Bonds** – Securities which are an issuer's undertaking to pay to bond holders the issued principal and interest on set dates or upon fulfillment of certain conditions.
C	**Credit** – A process which includes analysis and assessment of credit risk inherent in a transaction and approval of such transaction in conformity with policy and procedures, in order to extend credit.
D	**Debt under re-structuring** – Troubled debt under re-structuring is defined as debt for which, for economic or legal reasons related to financial difficulties of the debtor, the Bank has made a concession by way of a modification to the terms of the debt, in order to ease the burden on the debtor of cash payments in the near term (reduction or deferral of cash payments due from the debtor), or by way of receiving other assets as debt repayment (in whole or in part). **Debt under special supervision** – Debt under special supervision is debt with potential weaknesses that require special attention from the Bank's management. If such weaknesses are not addressed, the likelihood of debt repayment may decline. **Derivatives** – A financial instrument or contract whose value changes in response to changes in the price of the underlying asset (a financial instrument, physical asset, index, rating or other underlying asset), requires a small or minimal initial investment, compared to other contract types, and is expected to be settled on a future date.
F	**Financial instrument –** A contract that creates a financial asset for one entity and a financial liability or capital instrument for another entity.
I	**Indebtedness** – On- and off-balance sheet credit defined in Proper Conduct of Banking Business Directive 313. **Inferior debt** – Inferior debt is debt insufficiently secured by collateral or by debtor repayment capacity, and for which the Bank may incur a loss if faults are not corrected, including debt over NIS 700 thousand which is 60-89 days in arrears. **ISDA** – An agreement which covers transactions in derivatives between banks and allows for aggregation and offset into a single amount of net obligations of either party to all transactions together, upon occurrence of a bankruptcy event or another event which qualifies for transaction closing, according to the agreement.
N	**Non-accruing debt** – Debt is classified as non-accruing debt when its principal or interest is in arrears over 90 days, unless the debt is well secured and is in collection proceedings. Furthermore, any debt whose terms and conditions have been modified in re-structuring of troubled debt shall be classified as non-accruing debt, unless prior to and following such re-structuring, a by extent of arrears has been made for such debt, in conformity with appendix to Proper Conduct of Banking Business Directive 314 regarding problematic debt in .
O	**Off-balance** – Contracting for providing credit and guarantees (excluding instruments).
R	**Recorded debt balance** – The debt balance, including recognized accrued interest, un-amortized premium or discount, net deferred commissions or net deferred costs charged to the debt balance and not yet amortized, net of any debt amount subject to accounting write-off.
S	**Syndication** – Loan extended jointly by a group of lenders.
T	**Troubled debt** – Debt classified under one of the following negative classifications: Special supervision, subordinate or impaired.

Terms with regard to regulatory directives

F	**FATCA – Foreign Accounts Tax Compliance Act** – The US Foreign Accounts Tax Compliance Act (FATCA) stipulates mandatory reporting to the US tax authority (IRS) of accounts held by US persons with foreign financial institutions (outside the USA).
L	**LCR – Liquidity Coverage Ratio** – defined as the ratio of High Quality Liquid Assets and net cash outflow for the next 30 days, under a stress scenario. This ratio is a measure of the Bank's ability to meet its liquidity needs for the forthcoming month.

Other terms

S	**SOX** – US legislation, partially adopted by the Bank of Israel, designed to regulate responsibilities and internal controls over financial reporting and disclosure at the organization.

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