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National Bank of Georgia

ESG Reporting and Disclosure Template Version 2.0

Name of the Reporting Entity:	**Liberty Bank**
Date:	31.12.2025

This Reporting Form №3 (ESG Reporting and Disclosure Template) has been developed to facilitate the disclosure of Environmental, Social, and Governance (ESG) information in accordance with Article 5, Paragraph 4 of the Regulation on Disclosure Requirements for Commercial Banks and Microbanks under Pillar 3.

Commercial banks and microbanks shall disclose ESG-related information as part of their Pillar 3 Annual Report, utilizing the most recent version of Reporting Form №3 (currently Version 2.0), as developed and issued by the National Bank of Georgia (NBG). The objective of this requirement is to ensure the provision of relevant, useful, consistent, and comparable ESG information across the financial sector.

Reporting Form №3 has been developed in alignment with leading international ESG disclosure standards and frameworks, including the EBA Pillar 3 ESG Disclosure Requirements, Basel framework for the voluntary disclosure of climate-related financial risks, IFRS Sustainability Disclosure Standards S1 and S2, the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board Standards (SASB), Task Force on Nature-related Financial Disclosures (TNFD), and the European Sustainability Reporting Standards (ESRS). It follows double materiality approach and reflects global best practices to support the financial sector in improving transparency and accountability on ESG matters.

Institutions are requested to provide ESG-related information across the following thematic areas: 1. Governance; 2. Strategy; 3. Risk Management; 4.a Metrics and Targets – Key Performance Indicators (KPIs); 4.b Metrics and Targets – Transition Risk, and 4.c Metrics and Targets – Physical Risk.

Upon completion, Reporting Form №3 must be submitted to the NBG as part of the institution's Pillar 3 Annual Report. All submitted forms will be published on the NBG's official website to foster transparency, comparability, and accountability within the financial sector.

ESG/Sustainability risks and opportunities include climate-related, nature-related, and other environmental, social, and governance factors. If the institution's approach differs across these categories, it is expected to provide detailed disclosures for each risk or opportunity type.

In case of questions, please contact: SustainableFinance@nbg.gov.ge

Disclosure on Governance

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Qualitative information on financial institutions' governance processes, controls, and procedures used to assess, manage, and monitor ESG and sustainability-related risks and opportunities.

ESG/Sustainability risks and opportunities include climate-related, nature-related, and other environmental, social, and governance factors. If the institution's approach differs across these categories, it is expected to provide detailed disclosures for each risk or opportunity type.

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#	Question		Answer
1.1	Supervisory Board Oversight	Please describe how the bank's **supervisory board** oversees ESG/Sustainability-related risks and opportunities, including information about: • Whether and how responsibilities for ESG/Sustainability risks and opportunities are reflected in the board's **terms of reference, mandates, role descriptions**, and other relevant governance documents; • How often the board and its committees are **informed about ESG/Sustainability risks and opportunities**, and the processes through which information is communicated; • How the board and its committees considers ESG/Sustainability risks and opportunities when overseeing the **bank's strategy, its decisions on major transactions, and risk management processes**, including the approach to managing trade-offs or competing priorities; • How the board **oversees the setting of targets** related to ESG/Sustainability risks and opportunities, monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies (see also Remuneration section). • How the board ensures that the **appropriate skills and competencies** are available to oversee strategies designed to respond to ESG/Sustainability risks and opportunities;	• The Supervisory Board oversees ESG/sustainability related risks through the Risk Committee. The Bank's Risk Committee reviews and oversees risk strategies and risk appetite, which, among others, regulates the ESG risk management framework; the Committee regularly reviews the consistency and compliance of relevant issues with the Bank's strategy, capital, and financial plans, and submits relevant recommendations to the Supervisory Board. In addition, the Bank has numerous regulatory documents related to both ESG and climate change risk management, which, among others, are approved by the Board; • This information is provided to the Supervisory Board regularly, at least once a year; • ESG/sustainability risks are considered by the Supervisory Board in conjunction with the Bank's strategy, risk appetite, and the organization's long-term sustainability issues. • The Board oversees the progress of ESG/sustainability goals through the Bank's Risk Committee, to which detailed information about the risks existing in the Bank is regularly submitted by the Chief Risk Officer (CRO). In turn, the structural unit responsible for the Bank's ESG issues reports to the CRO, along with a dedicated employee - ESG Risks Manager. • Similar to other employees of the Bank, the awareness of Board members is raised at least once a year, with the involvement of both local and international experts.
1.2	Board of Directors Oversight	Please describe **management's (Board of Directors) role** in the governance processes, controls and procedures used to assess, manage and oversee ESG/Sustainability risks and opportunities, including information about: • Whether that role is **delegated to a specific management-level position** or management-level committee and how oversight is exercised over that position or committee; and • Whether management uses **controls and procedures** to support the oversight of ESG/Sustainability risks and opportunities and, if so, how these controls and procedures are integrated with other **internal functions**.	• Banks risks direction and ultimately the Chief Risk Officer (CRO) is responsible for ESG risk management, and in turn, the structural unit responsible for the Bank's ESG issues reports to the CRO, along with a dedicated ESG Risks Manager, who at the same time coordinates the ESG Working Group. • ESG risks management processes are integrated into the Bank's daily operations and formalized within its environmental and sustainability policies. To ensure continuous monitoring of targets and regulatory obligations, the CRO provides comprehensive performance updates to the Risk Committee on a quarterly basis as part of the standard risk reporting cycle.
1.3	Internal Reporting	Please describe how the bank integrates ESG/Sustainability risks and opportunities into its **internal reporting framework** and structure, including: • The **processes and mechanisms** through which ESG/Sustainability risks and opportunities are incorporated into internal reporting and information flows across the bank; • The **structure and responsibilities** related to the internal communication of ESG/Sustainability risks and opportunities between business lines, risk management, internal control functions, and the management body (Supervisory Board, Board of Directors); • The **frequency** of internal reporting and information exchange on ESG/Sustainability risks and opportunities, and how often the management body is informed of material ESG/Sustainability-related developments.	• In the Bank, internal ESG reports are prepared for several purposes; Primarily, these reports fulfill varying disclosure requirements set by the National Bank of Georgia (NBG). Furthermore, they serve to provide transparent updates to partner International Financial Institutions (IFIs) and global credit and ESG rating agencies. • Direct management of ESG and sustainability risks is handled by a dedicated Environmental, Social, and Governance (ESG) Risk Manager. In addition to core duties, the ESG Risks Manager coordinates a cross-functional ESG Working Group, which includes specialists from the business line, as well as financial and legal departments. Responsibilities related to the management ESG risks and opportunities are shared across the ESG Working Group. • Internal reporting regarding ESG/sustainability-related risks and opportunities, is produced at least once a year; as for the frequency of reporting to the National Bank of Georgia, the Green Taxonomy report is sent monthly, while the annual report is sent at least once a year.
1.4	Remuneration Policy	Please describe how ESG/Sustainability risks and opportunities are incorporated into the bank's **remuneration policy,** including: • **Whether** ESG/Sustainability-related factors are included as **criteria in the remuneration policies** applicable to the senior management (Board of Directors); • The specific ESG/Sustainability-related criteria, performance indicators, or metrics used to determine the **variable remuneration**; • **How** the achievement of ESG/Sustainability objectives is **monitored, assessed, and linked** to remuneration outcomes.	• As of reporting period, no such arrangements are in place; • N/A; • N/A.

Disclosure on Strategy

Qualitative information on how financial institutions integrate ESG and sustainability-related risks and opportunities into their business model, strategy, and financial planning.

ESG/Sustainability risks and opportunities include climate-related, nature-related, and other environmental, social, and governance factors. If the institution's approach differs across these categories, it is expected to provide separate and detailed disclosures for each risk or opportunity type.

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#	Question		Answer
2.1	Identified ESG Risks and Opportunities	Please describe the **ESG/Sustainability risks and opportunities** that are expected to affect the bank's prospects over the short, medium, and long term. In particular, please address: • A detailed description of the specific ESG/Sustainability risks and opportunities that the bank **has identified as being reasonbaly expected to materially affect** its prospects, including environmental, social, climate-related, and nature-related factors, where applicable; • The **time horizons** over which the identified risks and opportunities are expected to have an impact (short term, medium term or longer term); • The bank's **definitions of "short term", "medium term" and "longer term"**, and how these definitions are linked to the planning horizons used for strategic decision-making.	• Liberty Bank has established an Environmental and Social Risk Management System and an Environmental Policy, under which several risk categories have been identified, including legal liability risk, financial risk, reputational risk, credit risk, and market risk. In addition, in 2025 the Bank developed and approved its Climate Transition Plan, which identified two additional key categories of climate-related risks: Physical Risk and Transition Risk. Furthermore, the Bank applies a materiality assessment methodology to analyze the potential exposure of its existing business loan portfolio to climate-related physical and transition risks. Physical climate risks arise from complex climate-related hazards identified through climate modeling. The Bank monitors six key hazards: extreme heat days, drought, extreme precipitation, flooding, wildfires, and landslides. The analysis is based on three climate scenarios: SSP1-2.6, SSP2-4.5, and SSP5-8.5. All hazards are assessed according to geographical location, with analysis conducted at the regional level. The methodology follows the traditional risk assessment approach, whereby risk is defined as a combination of the likelihood of an event occurring and the severity of its impact. Climate hazard indicators reflect the annual probability of occurrence of a specific event; • Bank's focus encompasses the impact of climate change on Liberty Bank's operations, products, services, and credit portfolio. We identify and assess climate-related risks and opportunities over the short-term (2030), medium-term (2040), and long-term (2050) horizons. This analysis enables us to better understand and manage their potential effects on our business strategy, operational activities, and financial stability. Through this approach, we ensure that our perspective on climate change remains comprehensive and aligned with our sustainable development objectives;
2.2	Business Model	Please describe how the bank assesses and integrates ESG/Sustainability risks and opportunities within its **business model,** including: • A description of the **current and anticipated effects** of ESG/Sustainability risks and opportunities on the bank's business model and risk profile; • An explanation of where within the business model ESG/Sustainability risks and opportunities are **concentrated**, such as specific geographical areas, types of assets, client segments, facilities, or other relevant dimensions.	• For Liberty Bank, climate-related risks (Physical Risks and Transition Risks) have a significant impact on its business model and risk profile, including credit, market, and reputational risks. Physical risks (e.g., droughts, floods, landslides, etc.) increase the operational and financial vulnerability of clients, while transition risks (arising from changes in policy, technology, and market conditions) particularly affect high-emission sectors and overall financial resilience. At the same time, climate change creates opportunities for the expansion of green financing, the development of new products, and portfolio diversification; • Based on Liberty Bank's portfolio analysis, climate-related risks are primarily concentrated geographically in the regions of Tbilisi, Kakheti and Shida Kartli. From a sectoral perspective, the agriculture sector is the most vulnerable to physical climate risks, while the manufacturing and energy sectors are the most exposed to transition risks. Climate-related opportunities are mainly associated with the energy and agriculture sectors, as well as the expansion of green financing across other industries and the support of low-carbon projects.
2.3	Strategy and Decision-making	Please describe how the bank integrates ESG/Sustainability risks and opportunities into its **strategy and decision-making processes,** including: • How the bank **has responded to and plans to respond** to ESG/Sustainability-related risks and opportunities in its strategy and decision-making processes, including how these factors influence business planning, resource allocation, and long-term strategic priorities; • How the bank's **integration of ESG/Sustainability risks and opportunities evolves over time**, in response to evolving external factors such as changes in policy frameworks, technological developments, the broader business environment, stakeholder preferences (e.g., consumers and investors), and shifts in the physical environment; • How the bank resources, and plans to resource, the implementation of its ESG and sustainability-related strategic actions; • Quantitative and qualitative **updates on the progress made** toward ESG/Sustainability-related objectives or initiatives disclosed in previous reporting periods, including any adjustments to targets or strategies based on changes in market conditions, regulatory developments, or operational challenges.	• Liberty Bank takes ESG and climate-related factors into account in its strategic planning and decision-making processes. This is reflected in the strengthening of its climate risk management framework and the expansion of green financing activities. Climate-related risks and opportunities are incorporated into credit assessment and due diligence processes, portfolio management and segmentation, as well as the effective allocation of resources; • The Bank's ESG integration process is continuously evolving in line with regulatory requirements, technological developments, and market trends. In particular, the Bank: Applies scenario-based analysis using SSP climate scenarios; Regularly updates its climate risk assessment methodology; Takes into account policy and regulatory developments; Responds to the growing demand from clients and investors for green products and sustainable finance solutions; • The implementation of Liberty Bank's strategy is supported by: A governance structure that includes the Supervisory Board, Management Board, and Sustainability Task Force; The integration of ESG considerations into risk management processes; A system of KPIs and metrics, including GHG emissions reduction targets and portfolio alignment indicators; Regular monitoring and reporting mechanisms; • Liberty Bank has already taken significant steps in advancing its ESG agenda. These include the implementation of climate risk assessment systems, the initiation of financed emissions calculations, the establishment of a 7% annual emissions reduction target, and the definition of a minimum green loan portfolio growth target of 2–5% by the end of 2026. Furthermore, the Bank intends to progressively strengthen and enhance these ambitions in the years ahead.
2.4	Strategic Objectives and Targets	Please describe the bank's ESG/Sustainability-related strategic **targets and limits**. Specifically, address: • The ESG/Sustainability **targets and limits** established by the bank, including, where applicable, quantitative or qualitative indicators such as the Green Asset Ratio (GAR), greenhouse gas (GHG) emissions reduction targets, or other relevant sustainability metrics; • The **scope of application** of these objectives and targets, including whether they apply to the bank as a whole or to specific portfolios, business lines, client segments, or geographical regions; • The **time horizons** over which the objectives and targets apply, the base period used to measure progress, and any milestones or interim targets; • The processes used to **define, approve, monitor, and periodically review** these targets and limits, including the governance bodies involved and how progress is tracked over time; • The **alignment** of the bank's ESG/Sustainability objectives, targets, and limits **with relevant international and national frameworks**, such as the Paris Agreement, national climate policies, NDC; • The **actions taken** or planned to achieve ESG/Sustainability-related targets; • The bank's transition plan (if available), including key milestones, timelines, assumptions, external frameworks or standards adopted (e.g., Net Zero Banking Alliance, Science-Based Targets initiative, Global Biodiversity Framework), and consistency with the bank's broader strategy and risk appetite framework.	• Liberty Bank has established quantitative ESG targets, including: A minimum annual reduction of 7% in GHG emissions (Scope 1 and Scope 2); Ensuring portfolio alignment with a low-carbon development pathway (LEDS); Increasing the share of green loans to 2–5% of the portfolio by 2026; • These targets are defined within the framework of the Climate Transition Plan and are based on materiality assessments, portfolio analysis, and international regulatory frameworks. The Plan is approved by the Management Board, while oversight is provided by the Supervisory Board. Progress is monitored through KPIs and metrics, regular reporting, and periodic performance assessments; • The Bank's ESG targets cover: Direct and indirect emissions generated by the Bank's operations (Scope 1 and Scope 2); The credit portfolio; Priority sectors, including agriculture, energy, and manufacturing; • Liberty Bank's targets are established across short-term (2030), medium-term (2040), and long-term (2050) horizons. The baseline year is 2023, while interim targets have been set for 2030 and 2040; • The Bank's ESG targets are aligned with the Paris Agreement, Georgia's Long-Term Low Emission Development Strategy (LT-LEDS), IFRS S2, and the National Bank of Georgia's ESG Guidelines; • The Bank is implementing climate risk integration into credit processes, expanding green finance initiatives, and enhancing data management and analytical capabilities; • Liberty Bank has developed a Climate Transition Plan that defines its decarbonization pathway through 2050. The Plan is aligned with IFRS S2 requirements, includes portfolio alignment and emissions reduction targets, and is integrated into the Bank's overall strategy and risk management framework.
2.5	Scenario Analysis and Resilience	Please describe how the bank **assesses the resilience of its strategy** to ESG/Sustainability risks, taking into account different scenarios. Specifically, address: • How **scenario analysis** is used to evaluate the potential impacts of ESG and sustainability risks — including climate-related (transition and physical), nature-related — on the bank's strategy, financial position, business model, and risk profile; • The **types of scenarios considered**, such as different transition and physical risk scenarios, whether any scenarios are aligned with international agreements, and the time horizons applied in the analysis; • The **sources of scenarios used** (e.g. external reference scenarios or internally developed scenarios) and the **key assumptions and parameters** underpinning the analysis; • The **scope of operations covered** by the scenario analysis, such as relevant geographies, portfolios, business lines, or asset classes; • How the **results** of the scenario analysis **are used to inform** strategic planning, target-setting and transition planning (where applicable), portfolio management, and risk mitigation actions.	• Liberty Bank uses scenario analysis to assess the potential impact of climate-related (Physical and Transition) risks on its business activities, credit portfolio, and overall risk profile. Scenario analysis is applied to evaluate the likelihood and impact of various climate hazards on clients' assets, sectors, and geographical areas, with the results subsequently integrated into risk management and strategic planning processes; • The Bank uses internationally recognized climate scenarios, specifically SSP1-2.6 (low-emissions scenario), SSP2-4.5 (moderate-emissions scenario), and SSP5-8.5 (high-emissions scenario). These scenarios are aligned with the objectives of the Paris Agreement, particularly SSP1-2.6. The analysis has been conducted across multiple time horizons, including the 2020–2040 period and the longer-term horizon to 2050; • The scenario analysis is based on climate models and IPCC scenarios, national methodologies (including the NBG Risk Radar), and international sectoral studies (such as UNEP and others). Key parameters include the probability of climate hazards, the magnitude of their impacts, and asset vulnerability; • The scenario analysis covers geographical regions, the Bank's portfolio (with a particular focus on business loans), economic sectors (including agriculture, energy, manufacturing, and others), and underlying assets; • The results of the scenario analysis are used to support strategic planning and the effective implementation of the Climate Transition Plan, establish and enhance decarbonization targets, identify high-risk sectors and regions, inform credit decision-making processes, and design appropriate risk mitigation measures.
2.6	Financial Impact Consideration	Please describe how the bank considers the effects of ESG/Sustainability risks and opportunities on its **financial position, financial performance, and cash flows**. Specifically, address: • How ESG/Sustainability risks and opportunities **have affected** the bank's financial position, financial performance, and cash flows during the reporting period, including both quantitative impacts (such as specific amounts or ranges) and qualitative impacts where applicable; • The **anticipated effects** of ESG/Sustainability risks and opportunities on the bank's financial position, financial performance, and cash flows over the short, medium, and long term, and how these considerations are incorporated into financial planning processes.	• Liberty Bank's green portfolio has increased, and environmental awareness among the Bank's employees has improved as part of ongoing operational processes. This progress has also been supported by the establishment of the ESG Working Group within the Bank; • Over the short, medium, and long term, ESG factors are expected to influence the quality of the Bank's portfolio and its overall risk profile, alter sectoral exposures, and increase investment in green and sustainable financing initiatives.
2.7	Sustainable Credit and Investment Activities	Please describe the bank's current and planned **sustainable credit (lending) and investment** activities in alignment with its strategic objectives and transition plan. Specifically, address: • The bank's **current sustainable credit and investment activities**, including the types and volumes of green loans, social loans, other forms of sustainable lending, and investments in sustainable assets or projects; • The bank's **future (planned) sustainable credit and investment activities**, including anticipated changes in the composition of the loan and investment portfolio, development and scaling up of sustainable financial products, and any strategic focus on specific sectors, client segments, or geographies; • How the bank **monitors, assesses, and reports on the alignment** of its credit and investment activities with its ESG/Sustainability objectives, targets, and transition plan.	• Liberty Bank engages in sustainable lending activities, under which green loans primarily finance solar energy projects. As of 2025, green loans accounted for 0.30% of the Bank's total loan portfolio; • The Bank plans to expand its green and sustainable financing activities by increasing the share of green loans and focusing on specific sectors with strong sustainability potential; • The Bank intends to ensure compliance with its ESG commitments through climate risk monitoring, annual calculation of financed emissions, and ongoing monitoring of progress against established KPIs.
2.8	Counterparty Engagement	Please describe policies and procedures related to **direct and indirect engagement** with new or existing **counterparties** (clients) on their strategies to mitigate and reduce environmental risks and socially harmful activities. Specifically, address: • How the bank assesses **counterparties' capacity** to manage ESG/Sustainability risks and opportunities, including the methods, criteria, or tools used for evaluation; • How the bank engages in dialogue with **counterparties to encourage the mitigation** of ESG/Sustainability risks, including any specific engagement practices, monitoring mechanisms, or escalation procedures applied when ESG/Sustainability risk management practices are deemed insufficient.	• Liberty Bank assesses counterparties' ESG and climate risk management capabilities through a structured Climate and Environmental Due Diligence process. The assessment is based on data collection, climate heatmap analysis, and scorecard systems. The evaluation criteria include the client's ESG governance and strategy, emissions monitoring and reporting practices, exposure to climate-related risks, and adaptation capacity. As a result, each client is assigned a risk rating (Low, Medium, or High), which is reflected in the Credit Committee minutes; • The Bank actively engages in dialogue with clients to support the mitigation of ESG-related risks. Its approach is based on regular communication, the assessment of environmental risks associated with clients' activities, and the identification of appropriate mitigation and compensatory measures. In the case of business loans, ESG obligations form an integral part of the contractual documentation. Failure to comply with these obligations is subject to the same escalation mechanisms that apply to any other breach of contractual terms and conditions.

Disclosure on Risk Management

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Qualitative information on how financial institutions identify, assess, manage, and monitor ESG/Sustainability risks and opportunities, and how these are integrated into their overall risk management framework.

ESG/Sustainability risks and opportunities include climate-related, nature-related, and other environmental, social, and governance factors. If the institution's approach differs across these categories, it is expected to provide separate and detailed disclosures for each risk or opportunity type.

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#	Question		Answer
3.1	Assessment and Integration of ESG/ Sustainability Risks	Please describe the processes and related policies the bank has in place to **identify, assess, prioritize, manage, and monitor ESG/Sustainability,** including information about: • Existence and scope of official **ESG/Sustainability-related risk management policies**, their key focus areas, and operational integration; • Definitions, overarching methodologies, and **international/national standards** underpinning ESG/Sustainability-related risk assessments; • How the bank assesses the **nature, likelihood and magnitude of the effects** of those risks (for example, whether the bank considers qualitative factors, quantitative thresholds or other criteria); • Whether and how the bank **prioritises ESG/Sustainability-related risks** relative to other types of risk; • Whether the bank **has changed the processes it uses from the previous reporting period**, including its rationale and scope. • The extent to which, and how, the processes for identifying, assessing, prioritising, and monitoring **ESG/Sustainability-related risks are integrated into and inform the bank's overall risk management framework**.	• Liberty Bank has a formalized ESG and climate risk management framework, which includes the Environmental & Social Risk Management System, the Climate Transition Plan, and the Climate Risk Reporting Guideline. This framework covers credit processes, portfolio management, strategic planning, and climate-related reporting standards; • The Bank applies both international and national frameworks, including the National Bank of Georgia's ESG Guidelines and Green Taxonomy, as well as the GHG Protocol, PCAF, IFRS S2, and TCFD. Methodologically, the Bank relies on climate risk classification, materiality assessments, scenario analysis, and stress testing; • The Bank assesses ESG risks using the probability × impact principle. The tools employed include climate hazard indicators, exposure and vulnerability analyses, quantitative and qualitative criteria, and scorecard-based assessments; • ESG and climate-related risks are not considered in isolation but are integrated alongside other financial risks. The Bank prioritizes risks based on materiality assessments, the identification of high-risk sectors and regions, and analyses of portfolio exposure; • During 2025, the Bank further strengthened its ESG risk management practices by implementing scenario analysis, enhancing data collection and quality control processes, and introducing ESG-related KPIs. These developments were driven by legislative and regulatory changes; • ESG risk management is integrated into the Bank's overall risk assessment framework. In particular, climate-related risks are monitored and managed in a manner consistent with other risk categories, and, where possible, are incorporated into strategic planning processes, decision-making, and ongoing monitoring activities.
3.2	ESG Risk Management Processes, Tools, and Instruments	Please describe the **specific methodologies, tools, instruments, and operational processes** utilized to identify, measure, manage, and monitor activities and exposures that are sensitive or vulnerable to ESG/Sustainability risks, including information about: • The approach used to determine **materiality, including double materiality**, of ESG/Sustainability risks and how these risks are assessed throughout the life cycle of exposures, including at loan origination, during creditworthiness assessment, and through ongoing monitoring; • The **instruments and tools,** including forward-looking tools (stress testing, sensitivity analysis, scenario analysis) used to evaluate ESG/Sustainability risks and levels at which these tools are applied (exposure-level, portfolio-level, sectoral-level, etc.); • Detailed **methodologies and parameters** used to identify and measure sensitive or vulnerable exposures, including consideration of collateral where relevant; • **Processes for ongoing monitoring** and management of identified sensitive exposures, including escalation procedures if risks exceed thresholds;	• Liberty Bank determines the materiality of ESG and climate-related risks based on materiality assessments, portfolio analysis, and the identification of risk transmission channels. The process includes the identification of risk drivers, the assessment of their impact on credit, operational, market, liquidity, and other risk categories, followed by the establishment of quantitative and/or qualitative thresholds. The principle of double materiality is also reflected in the Climate Transition Plan, which requires coverage of the entire organization and value chain in such a way that any exclusions are not material either to the Bank or from the perspective of environmental impact. ESG and climate-related risks are assessed throughout the lifecycle of financial products, beginning at the loan application stage and continuing thereafter; • The Bank uses both current and forward-looking tools, including materiality assessments, sensitivity analysis, scenario analysis, and climate stress testing. The Reporting Framework explicitly states that the final materiality assessment may incorporate sensitivity analysis, scenario analysis, and stress testing, while climate stress testing may be integrated into the ICAAP and capital planning processes. These tools are applied at different levels. At the client level, the Bank uses Due Diligence assessments, PRI and TRI scorecards; at the sector and portfolio levels, it applies materiality assessments, financed emissions calculations, portfolio alignment analysis, and stress testing; • Vulnerability assessments are based on client-, sector-, asset-, and location-specific data. With respect to collateral, the framework provides for the classification of collateral into eight categories and requires the most precise possible identification of asset location (region, municipality, city, village, etc.), as well as the valuation of assets from multiple perspectives. The condition of the asset is also considered an important factor in the assessment; • Identified vulnerable assets and exposures are monitored as part of the Loan Monitoring process. According to the Climate Transition Plan, this stage represents one of the key phases of the loan lifecycle and serves as an early warning mechanism. Where the results of the PRI/TRI Scorecards indicate elevated risk, the Bank may undertake additional engagement with the client, integrate the scorecard results into its internal Probability of Default (PD) rating system, and apply a downward override in cases of poor performance. The outcomes of the due diligence process are documented in the loan appraisal form and submitted to the Credit Committee. Based on this information, the Credit Committee may approve the loan, reject the application, return it for additional information, grant conditional approval, or modify the loan terms and conditions.
3.3	ESG Risk Management and Mitigation	Please describe how the bank **manages and mitigates ESG/Sustainability risks,** including information about: • **Key findings** from ESG/Sustainability risks assessments and analyses (e.g., climate scenario analyses, ESG due dilligence) and how assessment outcomes have **influenced strategic decisions**, risk appetite, and resource allocation; • Whether and how ESG/Sustainability risks and their impacts are incorporated into the Internal Capital Adequacy Assessment Process **(ICAAP)**; • Whether and how ESG/Sustainability risks and their potential impacts are incorporated into the Internal Liquidity Adequacy Assessment Process **(ILAAP)**; • The **measures, activities, and tools** implemented to manage and **mitigate ESG/Sustainability risks**, such as engagement with counterparties, adjustments of financial terms and conditions, integration of ESG risks into sectoral risk policies, portfolio diversification strategies, and the reallocation of financing and investments; • The **methodology** used to select appropriate mitigation measures and assess their effectiveness over time;	• The assessment conducted by Liberty Bank identified the agriculture sector as the most sensitive sector within the Bank's business loan portfolio from a physical risk perspective, with drought representing the primary hazard. From a transition risk perspective, the manufacturing and energy sectors were found to be the most vulnerable, particularly due to potential changes in policy, technology, and market conditions. The assessment also identified material exposures to drought and landslide risks within the business loan portfolio, while market risk exposure was determined to be the most significant transition risk. These findings have influenced the Bank's strategic decision-making, leading to the integration of climate-related factors into governance, strategy, risk management, and other key areas. The Bank also plans to formally recognize climate risk as a transversal/emerging risk within its overall risk management framework; • Yes. According to the relevant documentation, the integration of climate and ESG risks into the ICAAP is envisaged. The Reporting Framework explicitly states that climate stress testing should be incorporated into the capital planning process, particularly within the Internal Capital Adequacy Assessment Process (ICAAP). The results of such analyses are expected to be reflected in both the annual capital plan and the strategic capital plan. Furthermore, the thresholds applied in materiality assessments may also take capital impacts into consideration; • The existing documentation does not explicitly refer to the Internal Liquidity Adequacy Assessment Process (ILAAP) by name. However, the Reporting Framework indicates that climate materiality thresholds may include liquidity impacts and recognizes climate-related risks as risk drivers that can affect liquidity risk, among other risk categories. Therefore, the documentation demonstrates that liquidity considerations are conceptually incorporated; however, a specific and detailed process for integrating climate-related risks into the ILAAP has not yet been formally defined within these documents; • To manage ESG and climate-related risks, the Bank employs a range of measures and tools, including client engagement, due diligence processes, climate heatmaps, amendments to loan agreement terms and conditions where necessary, and the expansion of green financing activities; • The selection of mitigation measures is based on materiality assessments, analyses of risk transmission channels, evaluations of portfolio exposures, and established quantitative and qualitative thresholds. According to the Reporting Framework, these thresholds are reviewed and defined at least annually and may be linked to capital impacts, liquidity impacts, and concentration risk. Based on the identified exposures, the Bank determines the appropriate follow-up actions. The effectiveness of mitigation measures is assessed over time through climate-related KPIs, tolerance levels, climate dashboards, regular monitoring, and reporting processes. The Climate Transition Plan also предусматривает timely escalation procedures in cases where climate risk appetite limits are breached, while the Reporting Framework emphasizes periodic re-evaluation, peer and scenario comparisons, and continuous progress tracking.
3.4	Prudential Integration of ESG Risks	Please describe whether and how ESG/Sustainability-related risks are **integrated within the bank's prudential risk management framework**. Specifically, address: • How ESG risks (physical, transition, and liability) are **linked to and affect prudential risk categories** (credit, liquidity, funding, market, operational, and reputational risks). • **Methodologies and instruments** used to map ESG/Sustainability-related risks across prudential risk categories; • How short-, medium-, and long-term effects of ESG/Sustainability-related risks are embedded within the bank's **risk appetite, risk tolerance framework, and escalation processes**.	• At Liberty Bank, ESG and climate-related risks (including physical, transition, and liability risks) are considered drivers of existing prudential risks rather than a standalone risk category. Specifically, climate-related factors may affect: Credit risk, through the deterioration of clients' financial condition; Liquidity risk, through impacts on cash flows resulting from climate change or market developments; Market risk, through changes in asset prices driven by transition policies and technological developments; Operational risk, through damage to infrastructure caused by extreme weather events; Reputational risk, through negative consequences arising from non-compliance with ESG requirements; • The Bank applies several interconnected methodologies to reflect ESG risks within prudential risk management. These include: Transmission channels analysis, which determines how physical and transition risks are transmitted into credit, market, liquidity, and other risk categories; Materiality assessments, which identify the risks that are financially significant; Climate risk heatmaps
3.5	Data Availability and Quality	Please describe the **availability and quality of data** and information used to effectively manage ESG/Sustainability risks, including: • Types of ESG/Sustainability-related **data currently used**, distinguishing internal data, third-party sources, regulatory disclosures, and external benchmarks; • **Existing gaps** in ESG/Sustainability-related risk data affecting the bank's risk assessment and management capabilities.; • The **measures the bank is taking to address data gaps** and improve the quality, coverage, and accuracy of ESG/Sustainability-related risk data, including planned enhancements, technology adoption, new data partnerships, client engagement strategies, or methodological improvements.	• Liberty Bank uses ESG and climate-related data from a variety of sources, including internal data (such as GHG emissions), client-provided data (including questionnaires and asset location information), third-party sources (such as emission factors), and regulatory sources (including National Bank of Georgia tools); • The main types of data gaps and challenges include the provision of incomplete and/or unauthentic ESG data by clients, the lack of data required for Scope 3 emissions calculations, insufficient information regarding geographical locations, and limited historical data and practical experience; • The Bank plans to enhance its data collection processes, further refine its methodologies, deepen its practical expertise, and strengthen data quality control mechanisms.
3.6	Assessment and Integration of ESG Opportunities	Please describe the processes and related policies the bank has in place to **identify, assess, prioritize, manage and monitor ESG/Sustainability-related opportunities**, including information about: • Existence and scope of official p**olicies related to ESG opportunities**, including whether they are aligned with international and national standards; • **Processes, tools, and data** sources used to identify and evaluate ESG-related opportunities; • Whether and how the bank **prioritises ESG/Sustainability-related opportunities** relative to other strategic objectives; • How identified ESG/Sustainability-related opportunities are **integrated into the banks's business strategy** and decision-making processes, including links to new product development, market positioning, and long-term value creation.	• Liberty Bank has a formalized approach to ESG and climate-related opportunities through its Climate Transition Plan and Green Finance Framework. These frameworks are aligned with IFRS S2, TCFD, the National Bank of Georgia's ESG Guidelines, and the Green Taxonomy; • ESG opportunities are identified through portfolio and sectoral analyses, scenario analysis, and the assessment of market trends. The process is further supported by client engagement and the collection of ESG-related data. Data sources include internal portfolio and financial data, clients' ESG information, and external market and policy data; • The Bank prioritizes ESG opportunities based on materiality assessments and their potential financial impact, with a focus on strategic sectors and alignment of the portfolio with established sustainability objectives; • Identified ESG opportunities are integrated into the Bank's business strategy, product development processes, market positioning, and long-term value creation initiatives.

Disclosure on Metrics and Targets - KPIs

National Bank of Georgia

Key performance indicators (KPIs) across the three ESG pillars, reflecting how financial institutions measure, manage, and monitor their ESG/sustainability performance, assess progress toward stated objectives and targets, and address ESG/sustainability risks.

All metrics provided in this section should reflect data for the latest reporting year, unless otherwise specified. Please ensure consistency with the reporting period used in the institution's Pillar 3 Annual Report.

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#	Category	KPI	Unit of measure	Description & Guidance	Answer	Comment
				Environmental		
E.1	Green Financial Products	Volume of green loans issued during the reporting year (flow) (expressed in GEL)	GEL	Green loans refer to loans aligned with the Green Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy'. If the bank issues green loans in multiple currencies, please report them separately by currency. Please use the same definition of "Green Loan" throughout the remainder of this document.	12,433,590	
E.2			USD		0	
E.3			EUR		0	
E.4			Other currency		0	
E.5		Share of green loans in the total loans issued during the reporting year	%		0.30%	
E.6		Volume of other green financial products (guarantees, letter of credit, etc.) issued during the reporting year (flow) (expressed in GEL)	GEL	Green financial products refer to financial products aligned with the Green Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy'. If the bank issues green financial products in multiple currencies, please report them separately by currency. Please use the same definition of "Green Financial Product" throughout the remainder of this document.	0	
E.7			USD		0	
E.8			EUR		0	
E.9			Other currency		0	
E.10		Share of other green financial products (guarantees, letter of credit, etc.) in the total portfolio of other financial products issued during the reporting year	%		0	
E.11		Total volume of green loans outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		12,789,119	
E.12			USD		0	
E.13			EUR		0	
E.14			Other currency		0	
E.15		Share of green loans in the total outstanding portfolio of loans as of end of reporting year	%		0.30%	
E.16		Total Volume of other green financial products (guarantees, letter of credit, etc.) outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
E.17			USD		0	
E.18			EUR		0	
E.19			Other currency		0	
E.20		Share of other green financial products (guarantees, letter of credit, etc.) in the total outstanding portfolio of other financial products as of end of reporting year	%		0	
E.21		Volume of green investment securities as of end of reporting year (expressed in GEL)	GEL	Green Investment Securities refer to investment instruments (such as equity, debt, or fund units) where the underlying proceeds are exclusively applied to finance or re-finance new and/or existing projects that are aligned with the Green Taxonomy (as defined by the National Bank of Georgia (NBG) or equivalent international standards like the ICMA Green Bond Principles and EU Taxonomy). Please use the same definition of "Green Investment Securities" throughout the remainder of this document.	0	
E.22		Share of green investment securities in total amount of investment securities as of end of reporting year	%		0	
E.23		Volume of green debt securities issued during the reporting year (expressed in GEL)	GEL	Green Debt Securities refer to debt instruments (such as bonds) that have been granted status under the "Regulation on the Granting, Maintenance, and Revocation of Green, Social, Sustainability, and Sustainability-Linked Bond Status" by the NBG. This also includes securities aligned with recognized international standards—such as the ICMA Green Bond Principles or the Climate Bonds Initiative (CBI) Standards—and issued on either local or international markets. Please use the same definition of "Green Debt Securities" throughout the remainder of this document.	0	
E.24		Share of green debt securities in the total debt securities issued during the reporting year	%		0	
E.25		Total volume of green debt securities outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
E.26		Share of green debt securities in the total debt securities outstanding as of end of reporting year (stock)	%		0	
E.27		Green NPL Ratio	%	Share of non-performing green loans in the total green loans as of end of reporting year: Green NPL Ratio= (S3+POCI)/((S1+S2+S3+POCI)*100, where: S1 - Stage 1 green loans; S2 - Stage 2 green loans; S3 - Stage 3 green loans; and POCI - Purchased or Originated Credit-Impaired green loans	0	
E.28		Green Asset Ratio	%	Ratio of green assets (Loans, bonds, equity exposures, etc., financing activities classified as green) to total assets as of end of reporting year: GAR= Green Assets / Total Assets ×100	0.21%	
E.29		Green Loan Target	%	A green loan target refers to a quantitative goal, expressed as a percentage share of the total loan portfolio.	N/A	No specific target for green loans had been established by the Bank as of the end of 2025.
E.30	Emissions	Gross Scope 1 GHG emissions	Metric tons of CO2 equivalent (tCO2eq)	Emissions from sources owned or controlled by the bank (e.g., fuel combustion, company vehicles) for the reporting year. Methodology: GHG Protocol.	3,314.94	
E.31		Gross Scope 2 GHG emissions	tCO2eq	Indirect emissions from the generation of purchased electricity, steam, heating, and cooling consumed by the bank for the reporting year. Methodology: GHG Protocol.	0.641	
E.32		Gross Scope 3 GHG emissions (including financed emissions)	tCO2eq	All other indirect emissions in the value chain, including business travel, purchased goods, and services for the reporting year. Methodology: GHG Protocol.	200,907.10	Scope 3 emissions have been quantified solely in relation to financed emissions, using the Financed Emissions Tool developed by the National Bank of Georgia.
E.33		Carbon Footprint	tCO2eq	Total amount of greenhouse gases (GHGs) emitted directly or indirectly by the bank during the reporting year: Carbon Footprint = Scope 1 + Scope 2 + Scope 3.	204,222.69	
E.34		Gross financed emissions (Scope 3, Category 15)	tCO2eq	Emissions associated with lending, investments, and other financial services for the reporting year. Methodology: NBG Financed Emissions Tool; PCAF Standard.	200,907.10	The figure represents Scope 3 emissions.
E.35		Operational Carbon Intensity (Scope 1 & Scope 2)	tCO2eq/₾Mln.	GHG emissions per unit of business activity for the bank's own operations for the reporting year: Carbon Intensity= [Scope 1 + Scope 2 Emissions (tCO_2e)]/ Total Operating Income (₾ Mln).	7.437	
E.36		Financed Emissions Intensity (Scope 3, Category 15)	tCO2eq/₾Mln.	Carbon intensity of the bank's portfolio for the reporting year: Financed GHG emissions intensity (tCO_2e/₾Mln) = Σ [Financed GHG emissions$_i$ (tCO_2e) / Current value of loans$_i$/investments$_i$ (₾Mln)]	0.000046	
E.37		Financed Emissions Coverage	%	Percentage of the total portfolio (by value) for which the bank has calculated financed GHG emissions (Scope 3, Category 15) using the PCAF methodology. PCAF Coverage Ratio = (Exposure with calculated emissions / Total relevant portfolio exposure) × 100.	0.0046	
E.38		Carbon Footprint Target	%	Target for reducing total GHG emissions (Scope 1, 2, and 3) compared to a defined base year. In the comment section, please specify base year and target year.	N/A	No target had been established by the Bank for 2025.
E.39		Gross Financed Emissions Target	%	Target for reducing financed GHG emissions (e.g., associated with loans, investments) compared to a defined base year. In the comment section, please specify base year and target year.	N/A	No target had been established by the Bank for 2025.
E.40		Total Energy Consumption	kWh	Total energy consumed by the bank's buildings, branches, ATMs, and data centers. Include all relevant sources such as electricity, heating, and fuel, where applicable, during the reporting year.	9417859.642	

E.41	Energy Use & Efficiency	Renewable Energy Share (RES)	%	Percentage of total energy sourced from renewables (e.g., solar, wind) used across all bank-owned facilities during the reporting year. RES = (Renewable Energy Consumed / Total Energy Consumed) × 100 In the comment section, outline renewable energy procurement strategies and targets. Highlight green electricity procurement or on-site generation (e.g., rooftop solar panels).	≈0.005%	
E.42		Energy Consumption Intensity (ECI)	kWh per FTE	Operational energy efficiency measured as energy used per full time employee (FTE): ECI = Total Energy Consumption / Number of FTEs.	1852.54	
E.43		Energy Efficiency Improvement	%	Year-over-year reductions in energy consumption: EE = (PreviousEnergyPerFTE - CurrentEnergyPerFTE) / PreviousEnergyPerFTE * 100 In the comment section, describe key energy-saving initiatives, technology investments, and efficiency measures (e.g., smart systems).	N/A	
E.44	Water Management	Total Water Consumption	Cubic meters (m^3)	Total volume of water consumed across bank premises, including office buildings, branches, and operational hubs during the reporting year.	42,031	
E.45		Water Efficiency	m^3 per FTE	Water usage efficiency measured per full-time employee (FTE) during the reporting year: WE = Total Water Withdrawal / Number of FTEs. In the comment section, include trends, reduction initiatives, and internal targets.	8.27	
E.46		Water Recycling Rate	%	Percentage of total water withdrawn that is recycled or reused during the reporting year: WRR = (Volume of Recycled Water / Total Water Withdrawal) × 100 In the comment section, provide details on recycling practices and targets for increasing recycled water use.	0	
E.47	Waste Management	Total Waste Generated	Kilograms (kg)	Total volume of solid waste generated from the bank's operations, including branches, offices, and data centers during the reporting year.	834,319	
E.48		Waste Intensity	kg per FTE	Waste generation efficiency measured per full-time employee (FTE): WI = Total Waste / Number of FTEs. In the comment section, include trends and waste reduction initiatives.	164.11	
E.49		Waste Recycling Rate	%	Percentage of total waste that is recycled: RR = (Recycled Waste / Total Waste) × 100 In the comment section, provide details on recycling practices.	0	
E.50		Paper Use	kg	Total volume of paper used across the bank during the reporting year.	270,095	
E.51		Paper use Intensity	kg per FTE	Paper use efficiency measured per full-time employee (FTE): PI = Total Paper Use / Number of FTEs. In the comment section, explain trends and paper reduction initiatives.	53.13	
E.52		Digitalization Initiatives to Reduce Waste	Yes/No	Indicate whether digital services (e.g., e-statements, e-contracts, paperless onboarding) are implemented to reduce paper and operational waste.	Yes	To reduce paper waste, Liberty Bank has minimized the number of printers available in its workspaces. In addition, nearly all correspondence and documentation processes are carried out electronically, significantly reducing paper consumption across the Bank's operations.
E.53		E-Waste Collected	kg	Total amount of electronic waste collected (e.g., computers, phones, servers) that has been disposed of or recycled during the reporting year.	N/A	
E.54		E-Waste Intensity	kg per FTE	IT equipment lifecycle efficiency measured per full-time employee (FTE): E-WI = Total E-Waste Collected / Number of FTEs.	N/A	
E.55		Operational Waste Management Initiatives	Yes/No	Indicate whether the bank has implemented any waste management initiatives (e.g., waste separation, secure document shredding, employee awareness campaigns). If yes, describe the type and scope (e.g., pilot, HQ-wide, system-wide).	No	
E.56	Risk Management and Other Environmental Indicators	Environmentally Friendly Initiatives	Yes/No	Indicate whether the bank has implemented environmentally friendly initiatives (e.g., electric vehicles, rooftop solar, green procurement, office insulation upgrades). If "Yes", describe the types of initiatives, their scope (e.g., pilot, branch-level, company-wide) in the comment section.	No	
E.57		Exclusion list screening	Yes/No	Indicate whether the bank conducts screening against an environmental or ESG-related exclusion list.	Yes	
E.58		Climate-related governance preparedness	Yes/No	Indicate whether the governance bodies consider climate-related risks (e.g., physical risks—floods, heatwaves, droughts—and transition risks—policy changes, carbon pricing, technological shifts).	Yes	
E.59		Climate Risk Integration	Yes/No	Indicate whether climate-related risks (both physical and transition) are integrated into the bank's ESG risk management framework.	Yes	
E.60		Climate Risk Scenario Analysis	Yes/No	Indicate whether the bank performs climate-related risk scenario analysis for financial risk assessment.	Yes	
E.61		Climate Transition Plan	Yes/No	Indicate whether the bank has adopted a formal climate transition plan.	Yes	
E.62		Nature-related governance preparedness	Yes/No	Indicate whether governance bodies consider nature-related risks (e.g., deforestation, biodiversity loss, water stress).	Yes	
E.63		Nature Risk Integration	Yes/No	Indicate whether nature-related risks (e.g., ecosystem degradation, water stress, species loss) are integrated into the bank's ESG risk management framework.	Yes	
E.64		Nature Scenario Analysis	Yes/No	Indicate whether the bank performs scenario analysis to assess financial risks related to biodiversity loss or ecosystem degradation.	No	
E.65		Environmental Stress Testing	Yes/No	Indicate whether the bank conducts stress testing for climate or nature-related risks.	No	

Social

S.1		Volume of social loans issued during the reporting year (flow) (expressed in GEL)	GEL	Social loans refer to loans aligned with the Social Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy'. If the bank issues social loans in multiple currencies, please report them separately by currency. Please use the same definition of "Social Loan" throughout the remainder of this document.	0	
S.2			USD		0	
S.3			EUR		0	
S.4			Other currency		0	
S.5		Share of social loans in the total loans issued during the reporting year	%		0	
S.6		Volume of other social financial products (guarantees, letter of credit, etc.) issued during the reporting year (flow) (expressed in GEL)	GEL	Social financial products refer to financial products aligned with the Social Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy'. If the bank issues social financial products in multiple currencies, please report them separately by currency. Please use the same definition of "Social Financial Product" throughout the remainder of this document.	0	
S.7			USD		0	
S.8			EUR		0	
S.9			Other currency		0	
S.10		Share of other social financial products (guarantees, letter of credit, etc.) in the total portfolio of other financial products issued during the reporting year	%		0	
S.11		Volume of sustainable loans issued during the reporting year (flow) (expressed in GEL)	GEL	Sustainable loans refer to loans aligned with the Green Taxonomy and the Social Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy'. If the bank issues sustainable loans in multiple currencies, please report them separately by currency. Please use the same definition of "Sustainable Loan" throughout the remainder of this document.	0	
S.12			USD		0	
S.13			EUR		0	
S.14			Other currency		0	
S.15		Share of sustainable loans in the total loans issued during the reporting year	%		0	
S.16		Volume of other sustainable financial products (guarantees, letter of credit, etc.) issued during the reporting year (flow) (expressed in GEL)	GEL	Sustainable financial products refer to financial products aligned with the Green Taxonomy and the Social Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy'. If the bank issues sustainable financial products in multiple currencies, please report them separately by currency. Please use the same definition of "Sustainable Financial Product" throughout the remainder of this document.	0	
S.17			USD		0	
S.18			EUR		0	
S.19			Other currency		0	
S.20		Share of other sustainable financial products (guarantees, letter of credit, etc.) in the total portfolio of other financial products issued during the reporting year	%		0	
S.21		Volume of loans issued to women entrepreneurs during the reporting year (flow) (expressed in GEL)	GEL	Woman Entrepreneur, as defined by Sub-paragraph "kh" of the first paragraph of Article 2 of the "Regulation on Disclosure requirements for commercial banks within Pillar 3." Please use the same definition of "Woman Entrepreneur" throughout the remainder of this document.	0	
S.22			USD		0	
S.23			EUR		0	
S.24			Other currency		0	
S.25		Share of loans to women entrepreneur in the total loans issued during the reporting year	%		0	
S.26			GEL		0	

S.27		Total volume of social loans outstanding as of end of reporting year (stock) (expressed in GEL)	USD		0	
S.28			EUR		0	
S.29			Other currency		0	
S.30		Share of social loans in the total outstanding portfolio of loans as of end of reporting year	%		0	
S.31		Total Volume of other social financial products (guarantees, letter of credit, etc.) outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
S.32			USD		0	
S.33			EUR		0	
S.34			Other currency		0	
S.35		Share of other social financial products (guarantees, letter of credit, etc.) in the total outstanding portfolio of other financial products as of end of reporting year	%		0	
S.36		Total volume of sustainable loans outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
S.37			USD		0	
S.38			EUR		0	
S.39			Other currency		0	
S.40		Share of sustainable loans in the total outstanding portfolio of loans as of end of reporting year	%		0	
S.41		Total Volume of other sustainable financial products (guarantees, letter of credit, etc.) outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
S.42			USD		0	
S.43			EUR		0	
S.44			Other currency		0	
S.45		Share of other sustainable financial products (guarantees, letter of credit, etc.) in the total outstanding portfolio of other financial products as of end of reporting year	%		0	
S.46		Total volume of loans to women entrepreneurs outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
S.47			USD		0	
S.48			EUR		0	
S.49			Other currency		0	
S.50		Share of loans to women entrepreneurs in the total outstanding portfolio of loans as of end of reporting year	%		0	
S.51		Volume of social/sustainable/ sustainability-linked investment securities as of end of reporting year (expressed in GEL)	GEL	Social/Sustainability Investment Securities refer to investment instruments (such as equity, debt instruments, or fund units) where the proceeds are exclusively applied to finance or re-finance new and/or existing projects that are aligned with Social or Sustainability Taxonomies (as defined by the National Bank of Georgia or equivalent international standards, such as the ICMA Social Bond Principles or the ICMA Sustainability Bond Guidelines). Sustainability-Linked Investment Securities refer to investment instruments (such as equity, debt instruments, or fund units) whose financial and/or structural characteristics are linked to the issuer's achievement of predefined ESG/sustainability objectives (as defined by the National Bank of Georgia or equivalent international standards, such as the ICMA Sustainability-Linked Bond Principles). Please use the same definition of "Social, Sustainability, and Sustainability-Linked Investment Securities" throughout the remainder of this document.	0	
S.52		Share of social/sustainable/ sustainability-linked investment securities in total amount of investment securities as of end of reporting year	%		0	
S.53		Volume of social/sustainable/ sustainability-linked debt securities issued during the reporting year (expressed in GEL)	GEL	Social/Sustainable/Sustainability-linked Debt Securities refer to debt instruments (such as bonds) that have been granted status under the "Regulation on the Granting, Maintenance, and Revocation of Green, Social, Sustainability, and Sustainability-Linked Bond Status" by the NBG. This also includes securities aligned with recognized international standards—such as the ICMA Social Bond Principles, the ICMA Sustainable Bond Guidelines or ICMA Sustainability-linked Bond Principles—and issued on either local or international markets. Please use the same definition of "Social/Sustainable/Sustainability-linked Debt Securities" throughout the remainder of this document.	0	
S.54		Share of social/sustainable/ sustainability-linked debt securities in the total debt securities issued during the reporting year	%		0	
S.55		Total volume of social/sustainable/ sustainability-linked issued debt securities outstanding as of end of reporting year (stock) (expressed in GEL)	GEL		0	
S.56		Share of social/sustainable/ sustainability-linked debt securities in the total issued debt securities outstanding as of end of reporting year (stock)	%		0	
S.57		Social NPL Ratio	%	Share of non-performing social loans in the total social loans as of end of reporting year: Social NPL Ratio = (S3+POCI)/((S1+S2+S3+POCI)*100, where: S1 - Stage 1 social loans; S2 - Stage 2 social loans; S3 - Stage 3 social loans; and POCI - Purchased or Originated Credit-Impaired social loans.	0	
S.58		Sustainable NPL Ratio	%	Share of non-performing sustainable loans in the total sustainable loans as of end of reporting year: Sustainable NPL Ratio = (S3+POCI)/((S1+S2+S3+POCI)*100, where: S1 - Stage 1 sustainable loans; S2 - Stage 2 sustainable loans; S3 - Stage 3 sustainable loans; and POCI - Purchased or Originated Credit-Impaired sustainable loans.	0	
S.59		NPL Ratio for women entrepreneurs (WE)	%	Share of non-performing loans to women enterprises in the total loans to women enterprises as of end of reporting year: WE Non-performing loans = (S3+POCI)/((S1+S2+S3+POCI), where: S1 - Stage 1 loans; S2 - Stage 2 loans; S3 - Stage 3 loans; and POCI - Purchased or Originated Credit-Impaired loans (here loans refer to loans issued to WE)	0	
S.60		Social Asset Ratio	%	Ratio of social assets (Loans, bonds, equity exposures, etc., financing activities classified as social) to total assets: SAR= Social Assets / Total Assets ×100.	0	
S.61		Sustainable Asset Ratio	%	Ratio of sustainable assets (Loans, bonds, equity exposures, etc., financing activities classified as sustainable) to total assets: SuSAR= Sustainable Assets / Total Assets ×100.	0	
S.62		Social Loan Target	%	A social loan target refers to a quantitative goal, expressed as a percentage share of the total loan portfolio.	0	
S.63		Sustainable Loan Target	%	A sustainable loan target refers to a quantitative goal, expressed as a percentage share of the total loan portfolio.	0	
S.64		Target for loans issued to women entrepreneurs	%	Target for loans issued to women entrepreneurs refers to a quantitative goal, expressed as a percentage share of the total loan portfolio.	0	
S.65		Diversity policy for governance bodies	Yes/No	Indicate whether the bank has a formal diversity policy covering the Supervisory Board and/or Board of Directors/executive management. If "Yes", provide the scope and implementation mechanisms in the comment section.	Yes	The Bank has a Board-approved Administrator Selection, Suitability, and Diversity Policy, which applies to both members of the Management Board and the Supervisory Board. The Policy establishes the criteria for the selection of administrators, including adherence to the principle of diversity within collective governing bodies as one of the key selection criteria. The diversity principle encompasses diversity in education, experience, and qualifications, as well as cultural and social diversity and gender balance. The implementation of the Policy, its periodic review, and any necessary updates are overseen by the Supervisory Board through its Nomination and Corporate Governance Committee.
S.66		Women on supervisory board	%	Percentage of women on the Supervisory Board at the end of the reporting year.	25%	
S.67		Women in Top Management	%	The share of women among senior executives, including members of the board of directors and other C-level positions, as of the end of the reporting year.	29%	

S.68	Employee Diversity	Women in Middle Management	%	Percentage of women in middle management roles as of the end of the reporting year. Define middle management based on the bank's internal classification.	46%	
S.69		Female Employees	%	Percentage of female employees in the total workforce as of the end of the reporting year.	70%	
S.70		Employees with Disabilities	%	Percentage of employees who self-identify as having a disability, based on local legal or internal HR definitions as of the end of the reporting year.	0.60%	
S.71		Disability-Inclusive Hiring Program	Yes/No	Indicate whether the bank has adopted inclusive hiring policies or specific programs targeting persons with disabilities. If "Yes", describe scope (e.g., hiring targets, accessible recruitment platforms), support measures, and progress in the comment section.	No	
S.72		Workforce age distribution as of the end of the reporting year	Number of employees per age group	<20	110	
S.73				20-30	1598	
S.74				30-40	2113	
S.75				40-50	978	
S.76				>50	847	
S.77		Gender Pay Gap	%	Percentage difference in average annual pay between all female and all male employees, calculated as: Gender Pay Gap = (Average male total remuneration –Average female total remuneration) / Average male total remuneration × 100. "Total annual remuneration" refers to the gross amount of all forms of compensation earned by an employee during the reporting year. This includes fixed pay (base salary), variable pay (bonuses, commissions, overtime), allowances (transportation, housing), and the monetary value of benefits (pension contributions, insurance, share-based payments). It excludes employer-paid taxes, dividends, and non-recurring payments not related to performance or service (e.g., severance pay or relocation stipends).	48%	
S.78		Gender Equal Pay Gap	%	Adjusted Gender Pay Gap – The percentage difference in average annual total remuneration between female and male employees performing the same or equivalent work (e.g., within the same grade, job level, or function). The adjusted averages should be calculated by comparing employees within the same or similar job grades, functions, or roles, and then aggregating the results using a common weighting structure. Adjusted Gender Pay Gap = (Average adjusted male total remuneration – Average adjusted female total remuneration) / Average adjusted male total remuneration × 100; where: Average adjusted male/female remuneration=∑ (Average male/female remuneration in group i×Weight of group i), i = job grade, function, or comparable employee group Weight of group i = the share of employees in that group relative to the total workforce.	35%	
S.79	Employee Development, Satisfaction and Retention	Training Coverage	%	Percentage of employees who received training during the reporting year.	59%	
S.80		Average Training Hours	Hours	Average annual training hours per Full-Time Employee (FTE) during the reporting year.	1 hour	
S.81		Training Investment per Employee	GEL	Average annual training and development expenses per employee during the reporting year. Include both internal and external training costs.	548 GEL	
S.82		Inclusion of ESG in Employee Training	Yes/No	Indicate whether ESG or sustainability topics are integrated into employee training programs (e.g., onboarding, annual refresher). In the comment section, describe the content, target audience (e.g., all staff, leadership), and frequency.	Yes	Compliance Training, Information Security Training, Occupational Health and Safety Training, Emergency Management Training, Sexual Harassment Prevention Training, Anti-Money Laundering (AML) Training, Operational Risk Management Training, Onboarding Training – New Employee Orientation Program
S.83		Internal promotion rate	%	Percentage of vacancies filled by internal candidates during the reporting year.	30%	
S.84		Employee turnover rate	%	Proportion of employees who left the bank during the reporting year. Turnover Rate = (Number Employees who left / Average number of employees) × 100 Where: Average number of employees = (Total employees at start of year + Total employees at end of year) / 2	20%	
S.85		Average Employee Tenure	Years	Average number of years employees have stayed with the bank as of end of the reporting year: Average Tenure = ∑ (Years of Service for each Employee) \ Total Number of Current Employees	5	
S.86		Employee satisfaction survey	Yes/No	Indicate whether bank conducts an employee satisfaction survey.	Yes	
S.87		Overall employee satisfaction rate	%	Percentage of employees who reported being "satisfied" or "very satisfied" (or an equivalent positive response). Please provide a description of the assessment approach in the comment section.	47%	ENPS score 27=promouters-detractors
S.88		Flexible Work Arrangements	Yes/No	Indicate whether flexible working arrangements (e.g., remote work, flex hours) are available. If "Yes", provide uptake percentage in the comment section.	Yes	15%
S.89		Parental leave uptake	Number	Total number of employees who took parental leave during the reporting year. Disaggregate by gender if possible.	414	including 3 male employees
S.90		Parental leave duration	Days	Average length of parental leave taken per employee. In the comment section, include any policies or support measures offered.	366	In accordance with the Labor Code, employees are entitled to up to 730 days of maternity and parental leave, of which 186 days are paid.
S.91	Labor Rights	Child and forced labor policy	Yes/No	Indicate whether the bank has a policy prohibiting child labor and forced labor. In the comment section, describe how the policy is communicated, enforced, and reviewed.	No	
S.92		Non-discrimination policy	Yes/No	Indicate whether the bank has a non-discrimination policy covering race, gender, religion, disability, or other grounds. In the comment section, outline implementation, communication, and enforcement mechanisms.	Yes	The Bank has developed a Corporate Handbook, which forms an integral part of the employment agreement. The Corporate Handbook establishes the principles of equal treatment of employees and the prohibition of all forms of discrimination in employment relationships. Employees may, at any time and through various reporting channels, including anonymously, report any discriminatory act or attempted discriminatory conduct directed against them. The Bank ensures the investigation of all relevant facts and circumstances related to such reports and undertakes all appropriate measures both to eliminate any identified discrimination and to prevent similar incidents from occurring in the future.
S.93		Compliance with labor standards	Yes/No	Indicate whether the bank complies with local labor laws and international standards (e.g., ILO). In the comment section, describe mechanisms for compliance (e.g., audits, training, corrective action).	Yes	The Bank ensures the continuous monitoring and assessment of labor legislation and best practices related to employment relationships, including relevant judicial practice. The employment agreement is fully compliant with applicable labor law requirements and clearly sets out employees' rights, protections, and guarantees.
S.94		Occupational Health and Safety Policy	Yes/No	Indicate whether the bank has a formal policy on occupational health and safety.	Yes	
S.95		Training on Labor Rights / Human Rights	Yes/No	Indicate whether labor rights and human rights are part of employee training.	No	
S.96		Grievance Mechanism – Labor Practices	Yes/No	Indicate whether the bank has a formal grievance mechanism in place for labor-related issues.	Yes	The Bank has a formalized grievance management procedure in place, which governs the submission, review, and resolution of complaints.
S.97		Number of Grievances Related to Labor Practices	Number	Report the number of complaints or grievances raised related to labor rights (e.g., working conditions, harassment, discrimination) during the reporting year.	0	The figure includes both ongoing and concluded court cases.
S.98		Inclusion of Labor Rights in Supplier Agreements	Yes/No	Indicate whether labor rights (e.g., fair wages, working conditions) are included in supplier/vendor agreements. In the comment section, describe how these are monitored and enforced.	Yes	The contracts concluded with suppliers and contractors contain general provisions requiring compliance with applicable national legislation. In addition, they explicitly prohibit the employment of underage individuals.
S.99	Customer	Customer satisfaction survey	Yes/No	Indicate whether the bank conducts customer satisfaction surveys. Describe frequency, and trends in the comment section.	Yes	The Bank conducts customer satisfaction surveys on a monthly basis. The key metrics measured are Net Promoter Score (NPS), Customer Satisfaction Score (CSAT), and Customer Effort Score (CES). The survey sample size represents 0.83% of the customer base annually, 1.66% quarterly, and 2.87% monthly. The main reports are prepared on a quarterly and annual basis. In 2025, the Bank's overall results were as follows: NPS – 72.0, CSAT – 96.7, and CES – 97.1. In addition, the Bank conducts both quarterly and annual customer satisfaction surveys across various customer segments, including Studio customers, business banking segments, lending segments, social segments, and other targeted customer groups.
S.100		Customer Retention Rate	%	Percentage of customers retained over the reporting year. Retention Rate = ((Number of customers at end of period – New customers during period) / Number of customers at start of period) × 100 "Customers" include both individual and corporate clients, and refer to active customers only — i.e., those with at least one active product or service relationship during the reporting period.	92.28	

S.101	**Satisfaction and Loyalty**	Customer Complaint Rate	Number, per 1,000 customers	Total number of complaints received during the reporting year, normalized per 1,000 active customers: Complaints Rate = (Total Complaints / Total Active Customers) x 1,000 "Complaints" include all types of customer complaints received through any official bank channel, including branches, call centers, email, online platforms, mobile banking, monitored social media, or those forwarded by the NBG.	4381	
S.102		Customer Privacy Complaints	Number, per 1,000 customers	Total number of complaints received concerning breaches of customer data privacy during the reporting year, normalized per 1,000 active customers: Privacy Complaints Rate = (Total Privacy Complaints / Total Active Customers) x 1,000 "Customer privacy complaints" include all complaints related to personal data protection or privacy breaches received through any official bank channel, including branches, call centers, email, online platforms, mobile banking, monitored social media, or those forwarded by the NBG.	1	
S.103		Accessibility for persons with disabilities	Yes/No	Indicate whether the bank has implemented policies or measures to ensure accessibility of facilities, digital platforms (e.g., websites, mobile apps), and documents for persons with disabilities. Describe key features and actions taken for customers in the comment section.	Yes	
S.104		Digital Service Usage Rate	%	Share of total customers using digital channels (e.g., mobile banking, online banking).	20.66	
S.105	**Stakeholder Engagement & Financial Inclusion**	Community investment	Yes/No	Indicate whether the bank contributed to local community development. Provide examples of supported projects or programs in the comment section.	Yes	Among the CSR initiatives implemented to support local communities, the following projects can be highlighted: 1. "Mountain Books" For the past four years, the *Mountain Books* project has been dedicated to improving access to books and promoting literacy among children living in remote mountainous villages. The initiative supports the popularization of reading, fosters interest in literature, and encourages the development of critical thinking skills in communities where access to educational resources is often limited and particularly important. 2. "Youth Entrepreneurship for Rural Development" Through this project, young people were given the opportunity to develop entrepreneurial skills and establish or expand more than 50 businesses. The initiative contributes to the growth of economic opportunities and promotes equal entrepreneurial conditions across regions. With Liberty Bank's support, a financial literacy program was also implemented, further strengthening the project's long-term social impact. 3. "My Doc" *My Doc* is Liberty Bank's social initiative aimed at improving access to quality healthcare services for individuals with limited access to medical care. Equipped with modern technologies, a mobile medical clinic provides free healthcare services to communities throughout the country, significantly reducing barriers to healthcare access in regional areas. Since 2025, the program has also included ophthalmological screening services, further enhancing its preventive healthcare component.
S.106		Financial inclusion initiatives	Yes/No	Indicate whether the bank implements initiatives aimed at expanding access to financial services for underserved, vulnerable, or previously unbanked populations. In the comment section, describe the scope of these initiatives, the target groups, and the delivery channels (e.g., mobile or online banking, micro- and SME financing, products tailored to rural communities, women, youth, or persons with disabilities, and other inclusive service models).	Yes	"Youth Entrepreneurship for Rural Development" Through this project, young people were provided with opportunities to develop entrepreneurial skills and establish or expand more than 50 businesses. The initiative contributes to the creation of economic opportunities and promotes equal conditions for entrepreneurship across the regions. With Liberty Bank's support, a financial literacy program was implemented, further strengthening the project's long-term social impact. "Inclusive Environment and Equal Opportunities" Implemented through the collaboration between Liberty Bank and the Georgia Development Foundation (GDF), this initiative aims to create an accessible service environment for persons with disabilities. As part of the project, a spatial accessibility standard and a policy document on the inclusion of persons with disabilities were developed and implemented, helping to ensure an inclusive, accessible, and customer-oriented service experience.
S.107		Individuals Reached via Financial Inclusion Initiatives	Number	Number of individuals served or reached through the bank's financial inclusion initiatives during the reporting year.	Yes	Liberty Bank annually assesses the reach and impact of its CSR initiatives by measuring the number of beneficiaries who have received support or participated in various programs. During 2025, a total of 401,952 individuals had the opportunity to engage in and benefit from projects initiated by Liberty Bank.
S.108		Access to financial services in underserved areas	%	Indicate the percentage of physical service points (e.g., branches) located in underserved regions of Georgia (excluding major urban centers such as Tbilisi, Batumi, and Kutaisi).	75.6	
S.109		Financial literacy initiatives	Yes/No	Indicate whether the bank runs financial literacy programs. If "Yes", describe the target audiences, delivery formats, and achieved outcomes in the comment section.	Yes	As part of the "Youth Entrepreneurship for Rural Development" project, Liberty Bank developed a dedicated training module focused on financial literacy. In addition, Liberty Bank collaborates with the National Bank of Georgia in initiatives aimed at improving financial literacy among young people and adolescents.
S.110		Participation in community development initiatives	Yes/No	Indicate whether the bank engages in public or private community development initiatives. If "Yes", describe the nature, scale, and outcomes of participation in the comment section.	Yes	Liberty Bank annually evaluates the reach of its CSR initiatives by assessing the number of individuals who have benefited from or participated in its various programs. During 2025, a total of 401,952 people had the opportunity to participate in projects initiated and supported by Liberty Bank.
S.111		Stakeholder engagement activities	Yes/No	Indicate whether the bank organizes stakeholder consultations, public meetings, or other engagement activities. If "Yes", specify the number and purpose of the activities conducted during the reporting period in the comment section.	Yes	Such assessments are conducted only in the case of specialized projects, such as service initiatives designed specifically for persons with disabilities.

Governance

G.1	**Board Oversight & Management Accountability**	Integration of ESG into Strategy	Yes/No	Indicate whether ESG-related aspects are integrated into the bank's long-term business strategy.	Yes	
G.2		ESG strategy approval by board	Yes/No	Indicate whether ESG-related strategies and policies are approved by the Supervisory Board.	Yes	
G.3		ESG expertise on the board	Yes/No	Indicate whether the Supervisory board members have relevant ESG experience or have completed specialized ESG certification.	Yes	
G.4		ESG oversight at board level	Yes/No	Indicate whether ESG oversight is assigned to the Supervisory Board and/or to a specific committee (e.g., ESG Committee, Risk Committee). Specify in comment section.	Yes	
G.5		Designated ESG officer or unit	Yes/No	Indicate whether ESG responsibilities are formally assigned to a dedicated officer or unit. If "Yes", provide the title, role, and reporting line in the comment section.	Yes	The ESG Risk Manager is accountable to the Chief Risk Officer (CRO).
G.6		ESG responsibility at management level	Yes/No	Indicate whether a member of senior management has oversight of ESG activity implementation (e.g., Chief Risk Officer).	Yes	
G.7		Integration into Internal Reporting Framework	Yes/No	Indicate whether the bank integrates ESG/Sustainability risks and opportunities into its Internal Reporting Framework (e.g., Management Information Systems (MIS), Risk Dashboards).	Yes	
G.8		ESG reporting frequency to the board	Annual / Biannual / Quarterly	Indicate how often ESG matters are formally reported to the Supervisory Board or relevant committee.	at least once in a year	
G.9		ESG Training for Board/Senior Management	Yes/No	Indicate whether ESG-related training is provided to the Supervisory Board members and/or senior management. In the comment section, specify the frequency, delivery format (e.g., online, in-person), and key topics covered.	Yes	At least twice a year, through online and/or in-person training sessions covering ESG risk management, anticipated regulatory developments related to climate change, the integration of climate change considerations into operational activities, and the implementation of the National Bank of Georgia's ESG Guidelines within banking processes.
G.10		ESG-linked Executive Remuneration	Yes/No	Indicate whether executive compensation includes ESG-related performance indicators or targets.	No	
G.11		Code of conduct	Yes/No	Indicate whether the bank has a formal code of conduct or ethics policy.	Yes	
G.12		Anti-bribery policy	Yes/No	Indicate whether the bank has an anti-bribery policy in place.	Yes	
G.13		Anti-money laundering (AML) policy	Yes/No	Indicate whether the bank has a formal anti-money laundering (AML) and Combating the Financing of Terrorism (CFT) policy.	Yes	

G.14	**Ethics & Compliance**	Business integrity policy	Yes/No	Indicate whether the bank has a formal policy promoting responsible business practices and ethical conduct.	Yes	
G.15		ESG-related fines or sanctions	Yes/No	Indicate whether the bank incurred any legal or regulatory penalties related to ESG issues during the reporting year. If "Yes", describe the type and value of fines in the comment section.	No	
G.16		Fines for anti-competitive behavior, anti-trust, and monopoly practices	Yes/No	Indicate whether the bank incurred any fines or expenses related to anti-competitive behavior, anti-trust, or monopoly practices during the reporting year. If "Yes", briefly describe the case(s) in the comment section.	No	
G.17	**Risk Management & Controls**	Business Continuity Plans (BCPs)	Yes/No	Indicate whether the bank has up-to-date business continuity plans for critical operational sites (e.g., head office, data centers, key branches). Specify scope, coverage, and testing frequency in the comment section.	Yes	
G.18		ESG Risk Management Policy	Yes/No	Indicate whether the bank has an approved ESG risk management policy.	Yes	
G.19		ESG Risk Integration	Yes/No	Indicate whether ESG risks are integrated into the bank's overall risk management framework.	No	Not formally documented; however, it is implemented in practice through established processes.
G.20		Cybersecurity policy	Yes/No	Indicate whether the bank has a formal cybersecurity policy.	Yes	
G.21		Cybersecurity audit	Yes/No	Indicate whether the bank conducts cybersecurity audits. Describe the audit frequency, scope (e.g., systems reviewed, internal/external audits) in the comment section.	Yes	Yes, the Bank conducts annual audits across its entire operations, including both internal and external audits. In addition, the Bank performs annual penetration testing of all existing systems to assess and strengthen its cybersecurity resilience.
G.22	**Transparency and Disclosure**	ESG/Sustainability disclosure aligned with recognized international frameworks	Yes/No	Indicate whether the bank publishes an ESG/Sustainability Report following internationally recognized standards or frameworks (e.g., GRI, SASB, UNGC, IFRS S1/S2). Specify which standards are used and the frequency of disclosure in the comment section.	No	
G.23		Third-party assurance of ESG disclosures	Yes/No	Indicate whether ESG/Sustainability Reportს are assured by a third party. Include the scope of assurance and the name of the assurance provider.	No	
G.24		ESG rating performance	Rating score	Report third-party ESG rating scores (e.g., MSCI, Sustainalytics). Describe dynamics over time in the comment section.	No	
G.25		ESG governance disclosure	Yes/No	Indicate whether the governance structure overseeing ESG issues is publicly disclosed (e.g., in sustainability or annual reports). Provide source in the comment section.	No	
G.26		Board consultation with stakeholders on ESG	Yes/No	Indicate whether formal engagement occurs between the Board and stakeholders (e.g., shareholders, NGOs) on ESG matters. Specify format and frequency in the comment section.	No	
G.27	**Sustainability Commitments**	Commitment to SDGs and/or Net Zero Alignment	Yes/No	Indicate whether the bank has made a formal commitment to the UN Sustainable Development Goals (SDGs) and/or to Net Zero or Paris Agreement targets. If "Yes", specify the nature of the commitment (e.g., specific SDGs, Net Zero year), and reference any supporting strategy or public statement in the comment section.	Yes	Liberty Bank has been a member of the Global Compact Network since 2023 and is actively engaged in advancing the Sustainable Development Goals (SDGs). The Bank's planned Corporate Social Responsibility (CSR) initiatives contribute to the achievement of SDG 1 (No Poverty), SDG 3 (Good Health and Well-being), SDG 4 (Quality Education), SDG 5 (Gender Equality), SDG 8 (Decent Work and Economic Growth), SDG 10 (Reduced Inequalities), SDG 13 (Climate Action), and SDG 16 (Peace, Justice and Strong Institutions).
G.28		Progress reporting on SDGs and climate goals	Yes/No	Indicate whether the bank publicly reports progress on SDG targets and/or Net Zero/climate alignment commitments. Include frequency and main disclosure channels in the comment section.	Yes	On an annual basis, Liberty Bank publishes its Communication on Progress (COP) report on the Global Compact platform, providing a summary of its corporate responsibility commitments, activities, and achievements.
G.29		Signatory to international initiatives	Yes/No	Indicate whether the bank is a signatory or member of international sustainability-related initiatives (e.g., PRB, PRI, PCAF, UN Global Compact, NZBA). If "Yes", list initiatives and date of joining in the comment section.	Yes	Liberty Bank is a participant of the United Nations Global Compact and a signatory to the UN Global Compact's Ten Principles. The Bank is also a signatory to the UN Women's Women's Empowerment Principles (WEPs), demonstrating its commitment to responsible business practices, human rights, labor standards, environmental stewardship, anti-corruption, and gender equality.

Disclosure on Metrics and Targets - Transition Risk

Quantitative information on bank's exposure by sector, together with associated financed emissions, credit quality and maturity ladder.

All metrics provided in this section should reflect data for the latest reporting year, unless otherwise specified. Please ensure consistency with the reporting period used in the institution's Pillar 3 Annual Report.

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საქართველოს ეროვნული ბანკი
National Bank of Georgia

		A	B	C	D	E	F	G	H	I	J
#	Sector/Subsector Name	Total Outstanding Loans issued to Legal Entities (GEL)			% of Total Exposure	GHG financed emissions (in tons of CO2 equivalent)	Residual Maturity				
			of which Green Loans	Of which non-performing loans			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted residual maturity
4.b.1	A - Agriculture, forestry and fishing	46,320,994		410,200	5%	68,943.57	35,584,959	10,535,035	201,000	-	3.49
4.b.2	*A.01 - Crop and animal production, hunting and related service activities*	45,453,443		410,200	4%		34,717,407	10,535,035	201,000	-	3.51
4.b.3	*A.02 - Forestry and logging*	105,617		-	0%		105,617	-	-	-	2.57
4.b.4	*A.03 - Fishing and aquaculture*	761,935		-	0%		761,935	-	-	-	2.31
4.b.5	B - Mining and quarrying	3,782,867		-	0%	249.69	548,747	3,234,120	-	-	5.84
4.b.6	*B.05 - Mining of coal and lignite*	-		-	0%		-	-	-	-	-
4.b.7	*B.06 - Extraction of crude petroleum and natural gas*	-		-	0%		-	-	-	-	-
4.b.8	*B.07 - Mining of metal ores*	-		-	0%		-	-	-	-	-
4.b.9	*B.08 - Other mining and quarrying*	3,669,659		-	0%		435,539	3,234,120	-	-	5.98
4.b.10	*B.09 - Mining support service activities*	113,208		-	0%		113,208	-	-	-	1.11
4.b.11	C - Manufacturing	165,788,266		-	16%	82,681.05	113,631,161	52,157,105	-	-	2.33
4.b.12	*C.10 - Manufacture of food products*	23,570,271		-	2%		12,479,201	11,091,069	-	-	3.78
4.b.13	*C.11 - Manufacture of beverages*	8,316,017		-	1%		4,785,021	3,530,995	-	-	4.76
4.b.14	*C.12 - Manufacture of tobacco products*	-		-	0%		-	-	-	-	-
4.b.15	*C.13 - Manufacture of textiles*	78,034		-	0%		78,034	-	-	-	3.14
4.b.16	*C.14 - Manufacture of wearing apparel*	452,139		-	0%		208,989	243,150	-	-	5.14
4.b.17	*C.15 - Manufacture of leather and related products*	997,187		-	0%		997,187	-	-	-	3.99
4.b.18	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	3,725,483		-	0%		892,920	2,832,563	-	-	7.11
4.b.19	*C.17 - Manufacture of pulp, paper and paperboard*	9,928,320		-	1%		6,236,815	3,691,505	-	-	4.23
4.b.20	*C.18 - Printing and service activities related to printing*	961,994		-	0%		845,430	116,564	-	-	3.79
4.b.21	*C.19 - Manufacture of coke oven products*	-		-	0%		-	-	-	-	-
4.b.22	*C.20 - Production of chemicals*	609,810		-	0%		609,810	-	-	-	3.57
4.b.23	*C.21 - Manufacture of pharmaceutical preparations*	6,671,050		-	1%		710,621	5,960,429	-	-	5.60
4.b.24	*C.22 - Manufacture of rubber products*	5,518,830		-	1%		2,900,919	2,617,911	-	-	3.87
4.b.25	*C.23 - Manufacture of other non-metallic mineral products*	42,138,724		-	4%		26,999,752	15,138,972	-	-	2.81
4.b.26	*C.24 - Manufacture of basic metals*	50,624,201		-	5%		50,624,201	-	-	-	(1.30)
4.b.27	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	293,722		-	0%		293,722	-	-	-	3.72
4.b.28	*C.26 - Manufacture of computer, electronic and optical products*	-		-	0%		-	-	-	-	-
4.b.29	*C.27 - Manufacture of electrical equipment*	-		-	0%		-	-	-	-	-
4.b.30	*C.28 - Manufacture of machinery and equipment n.e.c.*	15,748		-	0%		15,748	-	-	-	1.28
4.b.31	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	10,546		-	0%		10,546	-	-	-	1.43
4.b.32	*C.30 - Manufacture of other transport equipment*	-		-	0%		-	-	-	-	-
4.b.33	*C.31 - Manufacture of furniture*	2,498,382		-	0%		1,231,812	1,266,570	-	-	6.71
4.b.34	*C.32 - Other manufacturing*	7,009,321		-	1%		2,143,758	4,865,563	-	-	5.37
4.b.35	*C.33 - Repair and installation of machinery and equipment*	2,368,488		-	0%		1,566,675	801,813	-	-	3.78
4.b.36	D - Electricity, gas, steam and air conditioning supply	56,622,667	12,475,088	-	6%	4,366.54	45,440,987	11,181,680	-	-	1.45
4.b.37	E - Water supply; sewerage, waste management and remediation activities	140,000		-	0%	7.24	-	140,000	-	-	6.98
4.b.38	F - Construction	132,088,524		-	13%	10,824.29	126,196,014	5,892,510	-	-	1.53
4.b.39	*F.41 - Construction of buildings*	110,416,028		-	11%		108,032,500	2,383,528	-	-	1.34
4.b.40	*F.42 - Civil engineering*	261,504		-	0%		261,504	-	-	-	0.44
4.b.41	*F.43 - Specialized construction activities*	21,410,991		-	2%		17,902,010	3,508,981	-	-	2.53
4.b.42	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	240,058,922		-	24%	7,085.08	199,095,666	40,963,256	-	-	2.21
4.b.43	H - Transportation and storage	8,836,006		-	1%	9,963.49	6,452,611	2,383,395	-	-	4.26
4.b.44	*H.49 - Land transport and transport via pipelines*	8,269,288		-	1%		5,885,892	2,383,395	-	-	4.22
4.b.45	*H.50 - Water transport*	3,519		-	0%		3,519	-	-	-	0.09
4.b.46	*H.51 - Air transport*	-		-	0%		-	-	-	-	-
4.b.47	*H.52 - Warehousing and support activities for transportation*	563,199		-	0%		563,199	-	-	-	4.82
4.b.48	*H.53 - Postal and courier activities*	-		-	0%		-	-	-	-	-
4.b.49	I - Accommodation and food service activities	45,564,427		-	4%	3,748.23	23,132,489	12,398,345	10,033,593	-	6.40
4.b.50	K - Financial and insurance activities	157,632,051		276,249	15%	1,572.16	30,429,596	116,801,874	10,400,581	-	6.51
4.b.51	L - Real estate activities	54,004,600		-	5%	333	53,885,824	118,776	-	-	0.60
4.b.52	Exposures to other sectors (NACE codes J, M - U)	110,187,632		-	11%	11132.76	28,545,876	81,641,755	-	-	5.52
4.b.53	TOTAL	1,021,026,954		686,449	100%	200,907.10	662,943,929	337,447,851	20,635,174	-	3.31

Definitions:

Total Outstanding Loans issued to Legal Entities (GEL): The total stock of loans (on-balance sheet items) granted to legal entities (excluding sole proprietors) as of the end of the reporting year. Amounts should be reported in GEL, with foreign currency exposures converted using the end-of-period exchange rate.

of which Green Loans: Loans aligned with the Green Taxonomy, as defined in the 'Regulation on Loan Classification and Reporting in accordance with the Sustainable Finance Taxonomy', expressed in GEL. (https://nbg.gov.ge/en/page/sustainable-finance-taxonomy).

Of which non-performing loans: Non-performing loans defined as NPL= (S3+POCI), where: S3 - Stage 3 loans; and POCI - Purchased or Originated Credit-Impaired loans.

% of Total Exposure: Percentage share in total outstanding loans issued to legal entities (calculated automatically).

GHG Financed Emissions: Financed emissions of total outstanding loans to legal entities, by sector (can be calculated using the NBG Financed Emissions Tool - https://nbg.gov.ge/en/page/financed-emissions).

Residual Maturity: allocate loans to the relevant maturity bucket based on the loan's remaining maturity.

Average Weighted Residual Maturity: The average remaining maturity of loans, expressed in years, weighted by the outstanding loan amounts.

Comment Section:

Please describe any data gaps, use of proxies, estimation methods, or other data quality issues related to the reported figures. The page provides information on SME and corporate loans.

Disclosure on Metrics and Targets - Physical Risk

Quantitative information on bank's total exposure by geographical region and sector, together with credit quality and maturity ladder.

All metrics provided in this section should reflect data for the latest reporting year, unless otherwise specified. Please ensure consistency with the reporting period used in the institution's Pillar 3 Annual Report.

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#	Region	Municipality	A: Total Outstanding Loan Portfolio (GEL)	B: Total Outstanding Loans issued to Legal Entities (GEL)	C: A - Agriculture, forestry and fishing	D: B - Mining and quarrying	E: C - Manufacturing	F: D - Electricity, gas, steam and air conditioning supply	G: E - Water supply, sewerage, waste management and remediation activities	H: F - Construction	I: G - Wholesale and retail trade; repair of motor vehicles and motorcycles	J: H - Transportation and storage	K: I - Accommodation and Food Service Activities	L: K – Financial and Insurance Activities	M: L - Real Estate Activities	N: Other Sectors	O: Of which collateralized by real estate	P: Of which non-performing loans	Q: Total Outstanding Loans issued to HHs (GEL)	R: Of which loans collateralized by real estate	S: Of which non-performing loans	T: % of Total Exposure	U: Residual Maturity <= 5 years	V: > 5 year <= 10 years	W: > 10 year <= 20 years	X: > 20 years	Y: Average Weighted Residual Maturity
4.c.1	Tbilisi	Tbilisi	1,112,809,711	820,335,930	26,182,920	3,782,867	136,604,965	56,421,393	-	102,751,918	173,628,766	3,943,551	40,322,734	47,643,698	134,763,588	94,289,479	673,396,668	276,249	292,473,781	223,810,927	-	49%	691,738,841	390,140,964	30,929,907	-	3.13
4.c.2	Adjara	Batumi	176,514,437	106,354,337	1,867,563	-	14,113,222	-	-	24,546,475	33,827,646	1,732,235	2,769,740	4,710,146	17,350,393	5,436,917	101,701,532	-	70,160,100	45,143,385	-	8%	104,568,921	66,977,616	4,967,900	-	4.44
4.c.3		Keda	6,573,459	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,573,459	1,477,101	-	0%	5,968,633	604,827	-	-	-
4.c.4		Kobuleti	60,637,207	2,053,006	-	-	136,584	-	-	-	1,513,567	-	40,457	-	-	362,398	1,866,807	-	58,584,201	32,587,910	-	3%	40,427,501	20,019,706	190,000	-	4.69
4.c.5		Khelvachauri	8,343,331	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,343,331	2,886,257	-	0%	7,414,644	928,687	-	-	-
4.c.6		Khulo	4,400,583	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,400,583	309,281	-	0%	4,350,400	50,183	-	-	-
4.c.7		Shuakhevi	5,214,018	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,214,018	637,492	-	0%	4,901,490	312,529	-	-	-
4.c.8	Guria	Chokhatauri	4,905,363	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,905,363	525,719	-	0%	4,847,400	57,963	-	-	-
4.c.9		Lanchkhuti	4,828,281	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,828,281	371,927	-	0%	4,758,059	70,222	-	-	-
4.c.10		Ozurgeti	8,341,882	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,341,882	3,248,139	-	0%	7,185,979	1,155,903	-	-	-
4.c.11	Imereti	Baghdati	5,008,967	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,008,967	1,265,132	-	0%	4,586,031	422,937	-	-	-
4.c.12		Chiatura	5,424,150	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,424,150	1,479,125	-	0%	4,877,396	457,733	89,020	-	-
4.c.13		Khoni	7,740,953	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,740,953	3,264,425	-	0%	6,304,705	1,170,781	265,467	-	-
4.c.14		Kharagauli	4,710,361	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,710,361	839,860	-	0%	4,620,865	89,497	-	-	-
4.c.15		Kutaisi	108,841,394	28,934,486	536,995	-	8,843,679	-	-	2,680,590	8,104,996	742,856	1,048,096	2,397,365	3,829,373	750,535	26,326,114	-	79,906,908	56,391,097	-	5%	72,754,594	34,209,534	1,877,266	-	3.73
4.c.16		Sachkhere	9,786,451	164,841	-	-	-	-	-	-	164,841	-	-	-	-	-	164,841	-	9,621,610	1,923,231	-	0%	9,432,968	293,482	60,000	-	3.82
4.c.17		Samtredia	17,808,401	283,656	-	-	-	-	-	-	283,656	-	-	-	-	-	258,807	-	17,524,745	9,983,222	-	1%	11,928,437	5,519,682	360,281	-	5.83
4.c.18		Terjola	4,158,030	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,158,030	617,599	-	0%	4,032,692	125,338	-	-	-
4.c.19		Tkibuli	1,245,909	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,245,909	555,177	-	0%	939,045	306,864	-	-	-
4.c.20		Tsqaltubo	1,419,967	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,419,967	153,968	-	0%	1,329,967	90,000	-	-	-
4.c.21		Vani	4,988,216	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,988,216	1,793,737	-	0%	4,565,839	292,882	129,495	-	-
4.c.22		Zestaponi	16,394,657	63,001	13,001	-	-	-	-	50,000	-	-	-	-	-	-	-	-	16,331,656	5,352,802	-	1%	14,458,469	1,696,703	239,486	-	0.53
4.c.23	Kakheti	Akhmeta	6,050,721	35,773	35,773	-	-	-	-	-	-	-	-	-	-	-	35,773	-	6,014,947	1,953,084	-	0%	5,925,241	125,480	-	-	2.58
4.c.24		Dedoplistkharo	7,078,881	152,500	-	-	-	-	-	-	152,500	-	-	-	-	-	152,500	-	6,926,381	4,530,279	-	0%	6,676,611	174,206	228,064	-	1.32
4.c.25		Gurjaani	31,596,661	1,858,793	1,119,934	-	450,000	-	-	-	288,859	-	-	-	-	-	1,858,793	-	29,737,868	21,614,341	22,215	1%	27,081,278	4,515,384	-	-	2.54
4.c.26		Kvareli	25,390,680	115,675	-	-	-	-	-	-	115,675	-	-	-	-	-	115,675	-	25,275,006	18,568,308	-	1%	21,873,576	3,409,110	107,994	-	4.71
4.c.27		Lagodekhi	16,098,139	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,098,139	9,036,932	-	1%	14,079,996	1,878,484	139,658	-	-
4.c.28		Sagarejo	41,804,743	704,792	704,792	-	-	-	-	-	-	-	-	-	-	-	696,812	-	41,099,951	36,449,054	-	2%	40,740,807	891,002	172,933	-	1.90
4.c.29		Sighnaghi	921	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	921	-	-	0%	921	-	-	-	-
4.c.30		Telavi	19,845,887	1,898,763	587,688	-	355,812	-	-	-	419,387	-	-	342,957	-	192,919	1,344,460	-	17,947,124	11,719,753	8,447	1%	17,358,608	2,487,279	-	-	2.16
4.c.31		Tsnori	11,169,391	745,405	591,825	-	-	-	-	-	153,580	-	-	-	-	-	745,405	-	10,423,986	6,002,802	58,759	0%	10,483,115	513,505	172,771	-	3.27
4.c.32	Kvemo Kartli	Bolnisi	9,657,871	63,100	-	-	63,100	-	-	-	-	-	-	-	-	-	63,100	-	9,594,771	4,668,475	-	0%	7,977,819	1,680,052	-	-	1.84
4.c.33		Dmanisi	7,106,324	107,800	107,800	-	-	-	-	-	-	-	-	-	-	-	107,800	-	6,998,524	1,823,241	-	0%	6,536,442	569,882	-	-	3.82
4.c.34		Gardabani	9,085,538	12,611	-	-	12,611	-	-	-	-	-	-	-	-	-	-	-	9,072,927	2,370,277	-	0%	8,891,903	193,635	-	-	0.78
4.c.35		Marneuli	138,857,933	25,831,584	252,114	-	2,135,064	-	-	407,479	15,562,909	79,466	-	-	1,011,219	6,383,334	25,773,445	-	113,026,348	74,901,037	-	6%	119,103,349	19,749,971	4,612	-	3.62
4.c.36		Rustavi	18,195,136	3,011,277	8,929	-	649,577	-	-	-	1,402,266	47,959	-	-	100,116	802,430	2,911,029	-	15,183,859	9,069,724	-	1%	13,663,901	3,530,233	1,001,002	-	5.01
4.c.37		Tsalka	17,658,967	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17,658,967	7,728,107	-	1%	16,411,376	1,128,119	119,472	-	-
4.c.38		Tetritsqaro	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-	-	-	-
4.c.39	Mtskheta-Mtianeti	Akhalgori	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-	-	-	-
4.c.40		Dusheti	7,827,538	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,827,538	1,886,257	-	0%	7,452,764	292,665	82,109	-	-
4.c.41		Kazbegi	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-	-	-	-
4.c.42		Mtskheta	9,478,530	33,704	-	-	11,624	-	-	-	-	22,080	-	-	-	-	22,080	-	9,444,826	4,576,276	-	0%	7,651,400	1,697,030	130,100	-	2.31
4.c.43		Tianeti	316,111	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	316,111	-	-	0%	316,111	-	-	-	-
4.c.44	Racha-Lechkhumi and Kvemo Svaneti	Ambrolauri	5,955,756	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,955,756	2,796,772	-	0%	4,725,384	1,089,054	141,318	-	-
4.c.45		Lentekhi	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-	-	-	-
4.c.46		Oni	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-	-	-	-
4.c.47		Tsageri	5,564,593	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,564,593	1,322,819	-	0%	5,230,782	333,810	-	-	-
4.c.48	Samegrelo-Zemo Svaneti	Abasha	7,341,626	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,341,626	1,744,186	-	0%	7,106,755	234,871	-	-	-
4.c.49		Chkhorotskhu	13,200,218	27,796	27,796	-	-	-	-	-	-	-	-	-	-	-	-	-	13,172,422	6,585,606	-	1%	11,709,474	1,109,523	381,220	-	1.72
4.c.50		Khobi	4,261,086	37,714	-	-	-	-	-	-	-	-	-	37,714	-	-	-	-	4,223,373	319,578	-	0%	4,173,146	87,940	-	-	3.42
4.c.51		Martvili	10,126,889	13,505	13,505	-	-	-	-	-	-	-	-	-	-	-	-	-	10,113,384	2,305,011	-	0%	9,781,307	345,582	-	-	0.61
4.c.52		Mestia	9,533,816	48,470	-	-	-	-	-	-	-	-	48,470	-	-	-	-	-	9,485,347	2,204,931	-	0%	9,241,712	292,104	-	-	4.31
4.c.53		Poti	9,653,756	1,893,937	1,164,375	-	-	-	-	-	274,996	-	432,209	-	-	22,358	1,815,810	-	7,759,818	4,131,007	-	0%	6,984,569	2,445,252	223,935	-	3.45
4.c.54		Senaki	24,326,702	1,983,690	-	-	730,339	-	140,000	-	791,367	-	-	3,200	318,783	-	1,967,262	-	22,343,012	11,483,169	-	1%	18,061,903	5,819,910	444,889	-	7.11
4.c.55		Tsalenjikha	6,183,713	104,467	-	-	-	-	-	35,000	-	-	-	-	-	69,467	-	-	6,079,246	1,567,439	-	0%	6,167,653	16,060	-	-	1.07
4.c.56		Lia	5,462	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,462	-	-	0%	5,462	-	-	-	-
4.c.57		Zugdidi	42,168,991	2,041,268	92,831	-	302,020	-	-	24,275	773,685	-	109,243	683,926	55,289	-	1,229,217	-	40,127,723	21,918,097	-	2%	29,696,530	12,181,906	290,555	-	2.64
4.c.58	Samtskhe-Javakheti	Adigeni	7,979,939	448,569	448,569	-	-	-	-	-	-	-	-	-	-	-	448,569	-	7,531,370	3,437,986	-	0%	7,602,581	377,358	-	-	3.05
4.c.59		Akhalkalaki	12,065,787	47,097	45,077	-	2,020	-	-	-	-	-	-	-	-	-	47,097	-	12,018,689	6,674,247	-	1%	11,151,803	913,983	-	-	1.47
4.c.60		Akhaltsikhe	41,613,195	5,775,251	93,666	-	1,110,465	201,273	-	1,492,488	1,683,321	863,458	299,520	31,060	-	-	5,660,579	-	35,837,944	21,492,434	-	2%	27,323,629	13,248,775	1,040,791	-	3.65
4.c.61		Aspindze	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-	-	-	-
4.c.62		Borjomi	539,133	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	539,133	73,452	-	0%	489,590	49,543	-	-	-
4.c.63		Ninotsminda	5,395,184	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,395,184	1,824,312	-	0%	5,325,184	70,000	-	-	-
4.c.64	Shida Kartli	Gori	84,438,412	15,499,662	12,365,025	-	267,183	-	-	100,299	676,258	1,361,320	493,957	-	203,290	32,330	14,325,529	410,200	68,938,750	50,258,974	-	4%	63,851,636	19,809,432	777,343	-	3.39
4.c.65		Kaspi	7,640,236	61,375	-	-	-	-	-	-	18,294	43,081	-	-	-	-	18,294	-	7,578,861	2,442,969	-	0%	7,435,826	204,409	-	-	2.62
4.c.66		Kareli	11,567,224	60,766	60,766	-	-	-	-	-	-	-	-	-	-	-	37,290	-	11,506,458	2,961,856	-	1%	10,730,871	771,743	64,609	-	1.60
4.c.67		Mereti	30,007	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	30,007	-	-	0%	30,007	-	-	-	-
4.c.68		Khashuri	14,543,605	222,353	-	-	-	-	-	-	222,353	-	-	-	-	-	222,353	-	14,321,251	5,612,097	-	1%	12,153,603	1,654,406	735,596	-	2.92
4.c.69	Total		2,281,451,031	1,021,026,954	46,320,994	3,782,867	165,788,266	56,622,667	140,000	132,088,524	240,058,922	8,836,006	45,564,427	55,850,065	157,632,051	108,342,166	863,313,642	686,449	1,260,424,076	762,672,402	89,421	100%	1,607,197,506	628,885,730	45,367,795	-	1.48

Total Outstanding Loan Portfolio (GEL): The total stock of the loan portfolio (the sum of total outstanding loans issued to legal entities and total outstanding loans issued to households) as of the end of the reporting year. Amounts should be reported in GEL, with foreign currency exposures converted using the end-of-period exchange rate.

Total Outstanding Loans issued to Legal Entities (GEL): The total stock of loans (on-balance sheet items) granted to legal entities (excluding sole proprietors) as of the end of the reporting year. Amounts should be reported in GEL, with foreign currency exposures converted using the end-of-period exchange rate.

Of which collateralized by real estate: The total stock of loans (on-balance sheet items) granted to legal entities (excluding sole proprietors) that are collateralized by residential or commercial immovable property, as of the end of the reporting year. Amounts should be reported in GEL, with foreign currency exposures converted using the end-of-period exchange rate.

Total Outstanding Loans issued to HHs (GEL): The total stock of loans (on-balance sheet items) granted to households (including sole proprietors) as of the end of the reporting year. Amounts should be reported in GEL, with foreign currency exposures converted using the end-of-period exchange rate.

Of which loans collateralized by real estate: The total stock of loans (on-balance sheet items) granted to households (including sole proprietors) that are collateralized by real estate, as of the end of the reporting year. Amounts should be reported in GEL, with foreign currency exposures converted using the end-of-period exchange rate.

Of which non-performing exposures: Non-performing loans defined as NPL= (S3+POCI), where: S3 - Stage 3 loans; and POCI - Purchased or Originated Credit-Impaired loans.

% of Total Exposure: percentage share in total outstanding portfolio (calculated automatically).

Residual Maturity: allocate exposures to the relevant maturity bucket based on the loan's remaining maturity.

Average Weighted Residual Maturity: The average remaining maturity of loans, expressed in years, weighted by the outstanding loan amounts.

Location (region, municipality) should be assigned based on the actual address. In cases where loans are issued to companies operating in multiple locations (e.g., supermarket or retail chains) and the distribution of the loan across those locations is not possible, the loan may be allocated based on the legal address.

Comment Section:

Please describe any data gaps, use of proxies, estimation methods, or other data quality issues related to the reported figures. region, Tsnori has also been identified as a relevant location.