Bendigo Bank

# Basel III Pillar 3 Disclosures: Prudential Standard APS 330

25 August 2025

Bendigo and Adelaide Bank Limited (ASX:BEN) (the Bank), is an Authorised Deposit-taking Institution (**ADI**) subject to regulation by the Australian Prudential Regulation Authority (**APRA**). Attached is the prudential information required to be disclosed in accordance with Prudential Standard APS 330.

The public disclosure for 30 June 2025 has been prepared in accordance with the revised Prudential Standard APS 330 Public Disclosure effective from 1 January 2025, which aligns with the updated international standards for public disclosure set by the Basel Committee.

The Bank's Chief Financial Officer and Chief Risk Officer attest to the reliability of the APS 330 disclosures. They attest that the quantitative and qualitative disclosures have been prepared in accordance with relevant policies, internal processes, systems and controls, and have subsequently been verified and approved through internal governance procedures.

Approved for release by: Bendigo and Adelaide Bank Board


## Media enquiries

James Frost, Head of Public Relations

**m** 0419 867 219

**e** james.frost@bendigoadelaide.com.au

## Investor enquiries

Sam Miller, Head of Investor Relations and ESG

**m** 0402 426 767

**e** sam.miller@bendigoadelaide.com.au

ABN 11 068 049 178

# Basel III Pillar 3 Disclosures

Prudential Standard APS 330
For the period ended 30 June 2025

Released 25 August 2025

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# DIS20 – KM1 Key metrics (at consolidated group level)

## Amounts are in millions to 1 decimal place

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Table KM1 reports on the key prudential metrics related to risk-based capital ratios and liquidity standards.

| | | 30 Jun 25 | 31 Mar 25 | 31 Dec 24 | 30 Sep 24 | 30 Jun 24 |
|---|---|---|---|---|---|---|
| | | a | b | c | d | e |
| **Available capital (amounts)** | | | | | | |
| 1 | Common Equity Tier 1 (**CET1**) | 4,323.5 | 4,240.0 | 4,343.3 | 4,167.8 | 4,302.3 |
| 2 | Tier 1 | 5,125.9 | 5,042.4 | 5,145.7 | 4,970.2 | 5,104.7 |
| 3 | Total capital | 5,987.3 | 5,909.2 | 6,018.6 | 5,850.0 | 5,983.7 |
| **Risk-weighted assets (amounts)** | | | | | | |
| 4 | Total risk-weighted assets (**RWA**) | 39,304.5 | 39,164.9 | 38,870.9 | 38,353.0 | 38,005.2 |
| **Risk-based capital ratios as a percentage of RWA** | | | | | | |
| 5 | CET1 ratio (%) | 11.00% | 10.83% | 11.17% | 10.87% | 11.32% |
| 6 | Tier 1 ratio (%) | 13.04% | 12.87% | 13.24% | 12.96% | 13.43% |
| 7 | Total capital ratio (%) | 15.23% | 15.09% | 15.48% | 15.25% | 15.74% |
| **Additional CET1 buffer requirements as a percentage of RWA** | | | | | | |
| 8 | Capital conservation buffer requirement (2.5% from 2019) (%) | 2.50% | 2.50% | 2.50% | 2.50% | 2.50% |
| 9 | Countercyclical buffer requirement (%) | 1.00% | 1.00% | 1.00% | 1.00% | 1.00% |
| 11 | Total of bank CET1 specific buffer requirements (%) (row8 + row9) | 3.50% | 3.50% | 3.50% | 3.50% | 3.50% |
| 12 | CET1 available after meeting the bank's minimum capital requirements (%) | 6.50% | 6.33% | 6.67% | 6.37% | 6.82% |
| **Liquidity Coverage Ratio (LCR)** [1] | | | | | | |
| 15 | Total high-quality liquid assets (**HQLA**) | 13,036.2 | 13,417.6 | 13,002.4 | 13,106.7 | 13,570.9 |
| 16 | Total net cash outflow (**NCO**) | 9,854.0 | 10,005.2 | 9,620.4 | 9,695.4 | 9,851.4 |
| 17 | LCR (%) | 132.3% | 134.1% | 135.2% | 135.2% | 137.8% |
| **Net Stable Funding Ratio (NSFR)** | | | | | | |
| 18 | Total available stable funding (**ASF**) | 76,634.9 | 77,588.2 | 76,858.1 | 74,136.9 | 73,078.0 |
| 19 | Total required stable funding (**RSF**) | 66,102.7 | 66,134.9 | 65,110.4 | 63,414.6 | 62,798.6 |
| 20 | NSFR (%) | 115.9% | 117.3% | 118.0% | 116.9% | 116.4% |

1. LCR disclosures are based on quarterly averages.

## CET1

CET 1 ratio increased by 17 basis points (bps) to 11% in June 2025 (March 2025: 10.83%) driven by:

- decrease of 8 bps due to reduction in paid up share capital on account of treasury shares
- increase of 29 bps primarily due to net regulatory retained earnings and reserves $177.4 million, which was partially offset by an increase in capital deductions of $61.9 million. The impairment of goodwill of $539.5 million is net neutral on CET1 ratio
- decrease of 4 bps due to an increase in RWA (primarily credit RWA).

## RWA

RWA increase of $139.6 million (0.36%) to $39,304.5 million in June 2025 (March 2025: $39,164.9 million) is primarily due to growth in commercial property lending, up 5.1%, partially offset by a net reduction in residential property lending, down 1.1% due to the settlement of a new securitisation trust in April 2025.

## LCR

The LCR measures the ratio of HQLA to NCOs over a 30-day period under an APRA-defined severe short-term stress scenario. The Bank calculates LCR daily, maintaining a buffer to the Board's Risk Appetite and 100% regulatory minimum.

The Group's average LCR decreased to 132.3% in June 2025 from 134.1% in March 2025, reflecting a 2.8% decrease in liquid assets outpacing a 1.5% reduction in net cash outflows.

## NSFR

The NSFR measures the amount of ASF to the amount of RSF as defined by APRA. The Group calculates NSFR monthly ensuring a buffer is maintained above the regulatory minimum of 100% and the Board Risk appetite.

NSFR decreased to 115.9% in June 2025 from 117.3% in March 2025, decreasing by 1.4% largely due to a reduction in ASF as a result of long-term wholesale funding maturities moving in less than 12 month maturity bucket while RSF is stable on a quarterly basis.

# Risk Management Framework, material risk and business uncertainty

The Group operates in a complex and changing environment. Our Group Risk Management Strategy (**GRMS**), framework and practices support the Group to navigate such challenges and achieve its strategic objectives.

## Risk Management Framework

The Group Risk Management Framework (**GRMF**) comprises the structures, policies, processes, systems, and people the Group use as our consistent approach to managing material risks. Our framework components include:

- Our Risk Management Strategy
- Our risk appetite
- Our risk management approach of Identify, Assess, Act and Monitor.

Our GRMS is enabled by:

- Risk culture, roles and governance
- Risk policies, processes and systems.

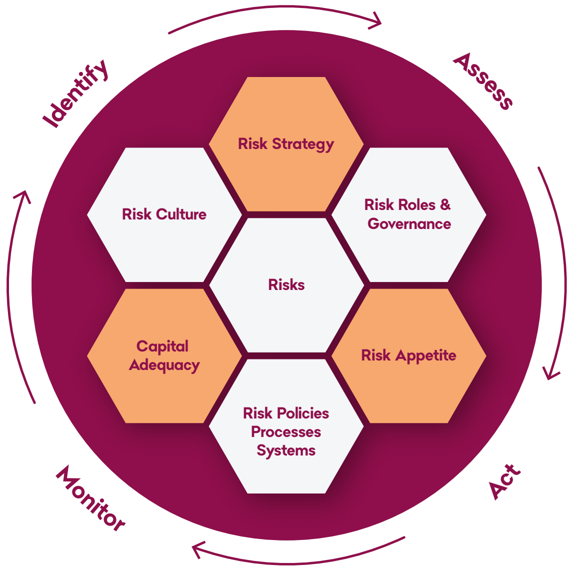


Figure 1: The Group's Risk Management Strategy

# Risk Management Strategy

At least annually the Board and management identify and consider material risks, emerging risks and capital adequacy as part of the strategic and business planning processes. This includes annual approval of the GRMS to confirm it is appropriate to the size, business mix and complexity of the Group.

## Internal Capital Adequacy Assessment Process (ICAAP)

The ICAAP is a part of our risk management strategy and capital management. It is an assessment of the appropriate level of capital that the Group should hold in relation to its material risks. The Group prepares an ICAAP Statement that summarises the Group's capital assessment and management process, including the ICAAP Report which serves as the key internal assessment of capital adequacy for the Group.

## Emerging Risks

The Group has an emerging risk process that enables the consideration of emerging risks in the development and implementation of strategy and business decisions. Emerging risk discussions are embedded in various divisional, management, and Board committees across the organisation. The outcomes of the emerging risks review feed into various other processes, including strategy planning, the review of the Group's material risks, risk assessments, and internal stress test planning.

## Risk Management Review and Declaration

The Board submits an annual Risk Management Declaration (**RMD**) to the Australian Prudential Regulation Authority (**APRA**) on the effectiveness of the GRMF.

The RMD process involves demonstrating how the GRMF meets the RMD statements prescribed by APRA and reviewing the outcomes of management self assessments and other risk, governance and assurance processes. This is followed by a process of management and Board review and approval.

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# Risk appetite

Risk appetite is the amount of risk the Board is willing to accept in pursuit of the Group's strategic objectives and business plans, considering the interests of customers and shareholders. The Board sets and approves the Group's risk appetite annually as part of its overall Group Strategy. The GRMS, risk appetite, ICAAP and Group Business Plan (known as the Three-year Group Strategic Plan) are integrated processes that are completed at a similar point each year.

The Board's risk appetite for its material risks is documented in the Group's Risk Appetite Statement (**RAS**). Risk appetite is set at a Group level, and is operationalised by management through settings, indicators, policies, frameworks, processes, and procedures.

The Risk Appetite Methodology (**RAM**) documents the Group's approach to setting risk appetite and enables management of material risks within a defined context, which is then aligned with the Group Strategy and business objectives.

# Risk management approach

The Group adopts a consistent risk management approach of Identify, Assess, Act and Monitor. This sets the Board and the Executive's expectations regarding the Group's approach to managing risk and the key elements of the GRMF that support this approach. Our risk management approach is enabled through the following:

- Risk culture, roles and governance
- Risk policies, processes and systems.

# Risk culture

A sound risk culture is foundational to effective risk management and decision-making. It shapes how people across the Group identify, assess, act and monitor risk in line with the Group's risk appetite.

The Group aims to foster a risk-aware culture that supports accountability, encourages speaking up, and enables sound judgement. Our Code of Conduct sets clear behavioural expectations and is a key mechanism to embed risk-aware decision-making into the way we do business.

The Board and Executive play a key role in setting the tone from the top, overseeing our risk culture, and identifying areas of strategic focus.

We monitor and strengthen our risk culture through a combination of enablement and oversight activities. Our approach both supports management in building a strong risk culture, and provides independent oversight and challenge where our culture may not support the Group's risk appetite. This dual focus is embedded through leadership engagement, feedback mechanisms, and ongoing measurement and reporting. Insights from internal and external reviews and regulatory guidance inform our approach and support continuous improvement in how we manage risk in a dynamic environment.

## Risk capabilities, skills, and behavioural expectations

To enable and support a strong risk culture, it is important that our people model expected organisational behaviours and continually develop their risk capabilities and skills.

Our Code of Conduct and organisational values guide our understanding of the behavioural expectations of our people. These values, underpinned by our critical few behaviours and leadership behaviours, provide clarity on day-to-day decision making and actions to help us execute our strategy whilst managing risk. Adherence to these behaviours is reviewed as part of the performance management cycle.

The People Capability Framework has a risk capability category called 'risk acumen' to reflect that risk management should be foundational and is everyone's responsibility across the Group. Risk acumen is a key pillar in both recruitment and ongoing performance management to ensure employees have the right capability and skills to manage risk.

Risk skills are the knowledge and expertise relating to the risk function, risk tools, or risk outcomes. Investment in risk skills are required to achieve better work outcomes, as current skills could become obsolete over time.

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# Roles

## Role of the Board

The Board is ultimately accountable for the risk management of the Group. The role of the Board is to promote the Group's values, purpose, strategy, vision, Code of Conduct and the GRMS (including the risk appetite), taking into consideration customers, employees, communities, and shareholders. The Board's key responsibilities are to oversight management's operation of the risk management framework, approving the GRMS, risk appetite, setting the tone for risk culture, and engaging with regulators. The Board and Board Committees provide constructive review on and challenge to the management of the Group's risks.

## Role of management

The role of management is to embed the Group's risk management frameworks, policies and standards in its processes. Management are responsible for the risk management of the Group including overseeing, monitoring and reviewing enterprise-wide financial, non-financial, and strategic risks. They are required at least annually to attest that key risks have been identified and are adequately controlled across their division(s).

## Three Lines of Defence

Three Lines of Defence is important because it:

- helps to define responsibilities for risk activities across the Group
- provides robust risk management and culture with capable resources
- helps to deliver strong, integrated Group-wide assurance activities
- considers Group's Accountability Framework.

Under our 'Three Lines of Defence' model, management has primary risk ownership responsibility, and the oversight and assurance are functionally independent.

| Line of Defence | Role | Responsibility |
|---|---|---|
| **First Line of Defence (1LoD)** Management accountability | Embed GRMF, policies and standards in its processes.<br>Undertake risk based decisions after consideration of risk information, risk appetite and risk profiles.<br>Reports on how it manages its risks to Divisional Risk Committees and Group Risk Committees.<br>Accountable Executives manage their risks within appetite and ensure their employees have sufficient risk capability to complete their day-to-day roles.<br>1LoD Risk and Compliance support the Divisions with their risk activities. | Ownership of risks arising from business strategy and processes, and must manage risks and obligations, within risk appetite. |

| Line of Defence | Role | Responsibility |
|---|---|---|
| **Second Line of Defence (2LoD)**<br>Challenge and oversight | Establishing the GRMF and policies for managing risk. The 2LoD structure under the Chief Risk Officer (**CRO**) has an operationally independent reporting line to the Chief Executive Officer and Managing Director.<br>2LoD is made up of specialised risk, compliance, and subject matter expert resources, responsible for the development of risk frameworks and policies. They provide advice, oversight and challenge of 1LoD risk practices.<br>Responsible for setting and monitoring adherence with frameworks and policies.<br>Reports to committees and Board on effectiveness of risk management and tools. | Ownership of the design and oversight of the GRMF and the extent to which it is fit-for-purpose to enable the business to manage risk. |
| **Third Line of Defence (3LoD)**<br>Independent assurance | 3LoD comprises Group Internal Audit (**GIA**) and provides independent assurance to the Board on the internal risk and control environment of the Group.<br>3LoD are independent of 1LoD and 2LoD management, with a direct reporting line to the Board Audit Committee (**BAC**).<br>External audit fulfils a 3LoD role by nature but is independent from GIA. | Ownership of execution of the BAC approved Strategic Audit Plan. |

## Accountability Framework

The Financial Accountability Regime (**FAR**) imposes accountability, deferred remuneration, key personnel, and notification obligations on the Group, its Significant Related Entities (**SREs**) and persons in Director and senior Executive roles. FAR provides APRA and Australian Securities and Investments Commission (**ASIC**) (the Regulators) with powers to investigate potential breaches of the FAR.

Individuals on whom personal obligations are imposed under FAR are known as 'Accountable Persons'. For the Group this includes all members of the Board (Directors), all Executives, and the General Manager, GIA.

FAR imposes accountability obligations on both Bendigo and Adelaide Bank Limited, as an Accountable Entity (and its SREs) as well as the Accountable Persons.

The Group has an Accountability Framework that sets out how the Bendigo and Adelaide Bank Limited, its SREs and its Accountable Persons meet their obligations under the regime.

# Governance

Risk governance is the process of setting strategy and frameworks for managing risk across the organisation, and ensuring those frameworks are consistently applied. Our corporate governance structure supports risk governance by providing oversight. This extends to both Board delegated responsibilities and Management's responsibilities under FAR.

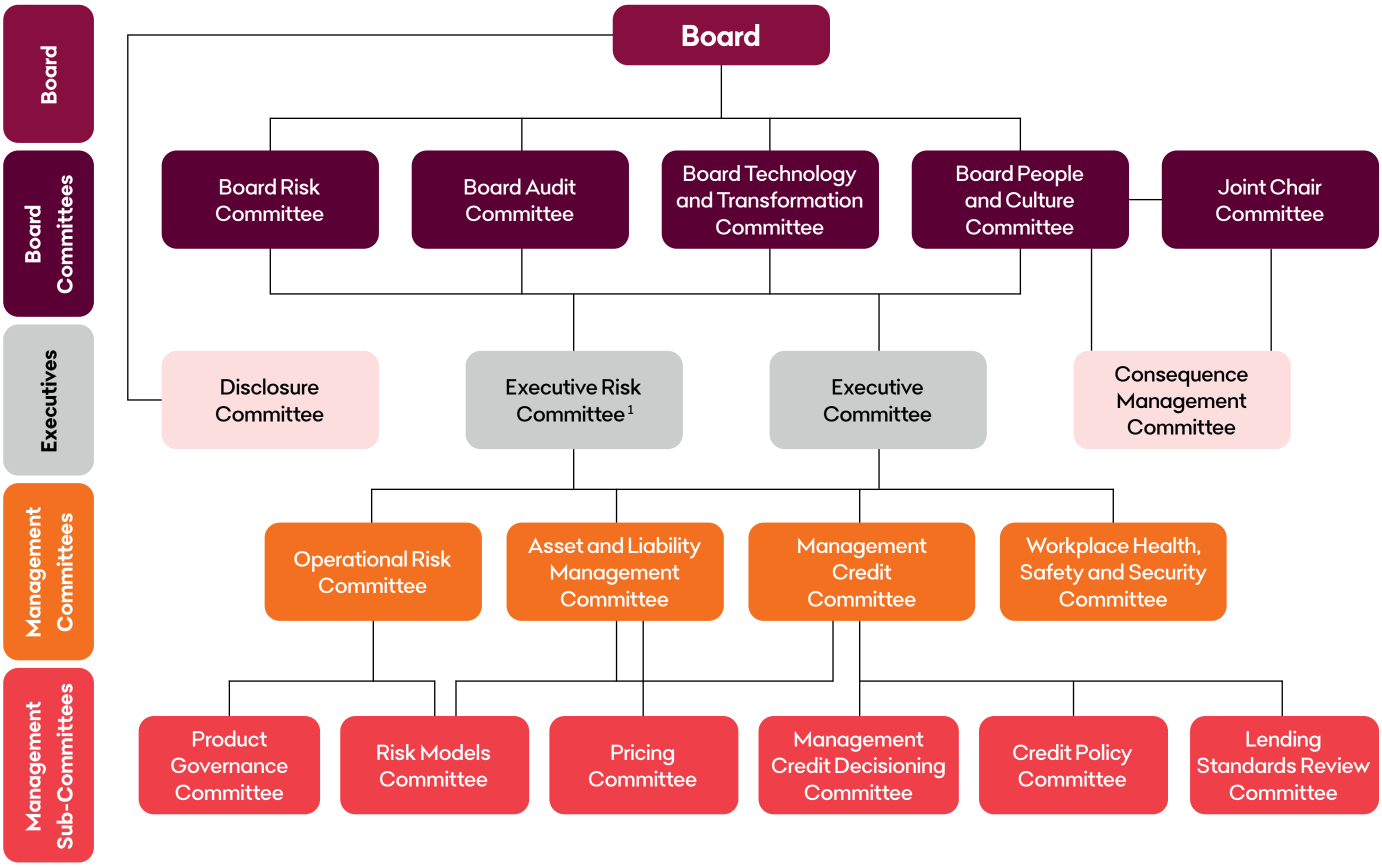
Our governance structures support the effective oversight and management of risk, including the execution of our strategic objectives, issue escalations, including consideration of prioritisation and sequencing of initiatives.

## Committee structure

The below table outlines the Board, Executive, and Management Committee structure for the Group. Each Committee has its own responsibilities that have been delegated from the Board. The key risk governance committees are:

| Governance Committee | Summary of responsibilities |
|---|---|
| **Board** | Ultimately accountable for the GRMS and responsible for the oversight of its operation by management. With assistance from the BAC and the Board Risk Committee (**BRC**), Board responsibilities including but not limited to:<br>• Approve the GRMS and policies for managing risk that require Board approval.<br>• Form a view of the risk culture in the Group, and the extent which that culture supports the ability of the Group to operate consistently within its risk appetite.<br>• Approve the risk appetite within which it expects management to operate.<br>• Monitor the effectiveness of risk management, including satisfying itself that appropriate internal control mechanisms are in place and implemented. |
| **Board Risk Committee** | Assists the Board by providing objective Non-Executive oversight of the Group's risk profile and operation of the GRMS with responsibilities including but not limited to:<br>• Advising and providing recommendations to the Board on the current and future risk appetite and GRMS.<br>• Oversight of an enterprise-wide view of the current and future risk position relative to the risk appetite, capital strength and resilience.<br>• Oversight of the implementation of the Board approved risk appetite and the GRMS, including with respect to service provider arrangements.<br>• Providing constructive challenge of proposals and decisions on all aspects of risk management. |
| **Executive Risk Committee** | Overseeing the Group's enterprise-wide risk profile, including regular reporting and monitoring on:<br>• Risk culture<br>• Risk management framework effectiveness<br>• Significant regulatory and prudential matters. |
| **Management Risk Committees** | Management Risk Committees provide consistent business challenge, direction and escalation of items regarding the management and mitigation of their in-scope material risk(s). The management committees consist of:<br>• Operational Risk Committee (**ORC**), including all non-financial risks;<br>• Asset & Liability Management Committee (**ALMAC**), including capital, liquidity, and market risks; and<br>• Management Credit Committee (**MCC**) covering credit risk. |
| **Divisional Risk Committees** | Monitor the divisional risk profile in accordance with the Operational Risk Management Framework (**ORMF**), RAS and risk culture.<br>Ensure the timely management of operational risk related activities under the ORMF.<br>Review, and where appropriate support the Accountable Executive report items for escalation to the ORC and/or Executive Risk Committee (**ERC**) as required. |

The below figure represents the Committee structure of the Group.




1. The Executive Risk Committee commenced 1 July 2025.

# Policies, processes and systems

## Policies and processes

The Internal Document Architecture Policy (**IDAP**) outlines the Group's document hierarchy to categorise document types and their governance lifecycle requirements, including policies and processes. This provides a standardised and consistent approach across the group to our documentation.

The IDAP requires that our documents have clear roles and responsibilities to embed ownership across the three lines of defence. The Responsible, Accountable, Support, Consulted, and Informed (**RASCI**) matrix template is an effective way of embedding roles and responsibilities.

Our risk policies follow the risk management approach of Identify, Assess, Act and Monitor to apply the risk management framework components.

## Risk Information Reporting

Risk reporting is defined as information presented that identifies, clarifies, analyses, or provides insight on a defined risk. This may either be qualitative or quantitative information. It may be produced on a periodic basis or ad hoc. The frequency of reporting may also vary. Especially during periods of crisis where there's a need to increase the frequency.

Group Risk and Divisional risk monitoring and internal reporting are critical components of our risk management framework. They support senior management and the Board in performing their responsibilities. Risk reports inform the Board and Senior Management of the Group's current, historical, and projected/emerging risk profile. They include risk quantification metrics, top and emerging risks, and risk profile relative to our risk appetite. They also feature analysis of issues, key trends and, when required, management actions. Additionally, they provide a foundation for any potential further actions that might need to be taken to ensure that the Group is effectively managing risk and operating within its defined risk tolerances.

## Systems

The Group utilises a number of key risk management information systems to manage material risks, supported by data management and governance through the Business System Ownership Policy. All risk management information systems (**MIS**) are recorded through the Group's Business Systems Register.

# Risks

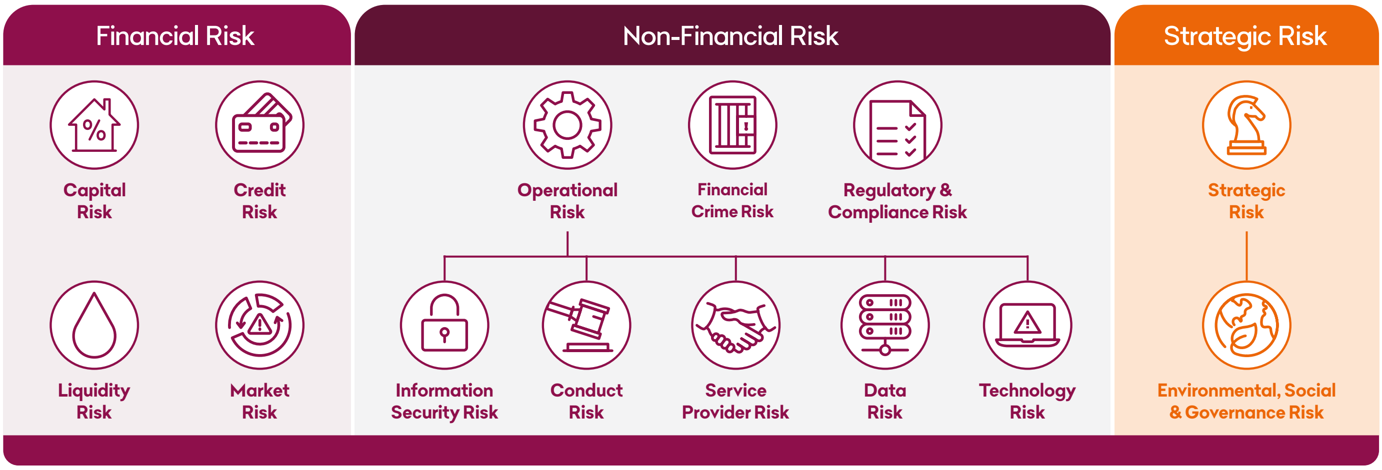
## Material risks

Our business is exposed to, and we regularly assess, a broad range of risks that could impact the Group's strategic objectives.

Those risks that could have a significant adverse impact on the Group are known as material risks.

We have identified fourteen material risk categories that have the greatest potential to impact the Group. These risks are represented across three risk types: financial risk, non-financial risk and strategic risk and outlined below.

For each material risk category, the Board establishes a risk appetite which is outlined in the RAS. The RAS lists our material risks, along with the measures and tolerances used to monitor each risk.




## Financial risks

Financial risks arise from the Group's risk-taking activities that are reflected in the Group's financial position and balance sheet.

## Financial risks (continued)

| | |
|---|---|
| **1. Capital risk** | Capital risk is the risk of holding insufficient capital to absorb unexpected losses.<br><br>The amount of capital held by the Group is informed by the ICAAP, which assesses the level of (and appetite for) risk and ensures that the level and quality of capital held is appropriate for the Group's risk profile, including under stressed conditions.<br><br>Group Treasury is responsible for managing capital risk. Group Treasury produces the Capital Management Plan annually, which outlines the Group's planned capital management activities, mix, and objectives over a three-year horizon. The Capital Management Plan reflects any expected changes to the Group's strategy, business activity, operating environment, or other factors arising out of the Group's business plans that may impact the Group's risk profile or capital requirements. Capital management strategies are developed to support these requirements while ensuring capital levels remain above Board and regulatory minimums.<br><br>The Group sets capital ratio targets above regulatory minimums which incorporate buffers designed to ensure the Group can absorb the impact of losses and continue to lend during periods of stress and protect the interests of depositors. Compliance with capital targets and regulatory requirements is continuously monitored.<br><br>Stress testing and scenario analysis inform capital management decision-making, and the calibration of Board and Management targets. The Group's strategic planning process requires that appropriate levels of capital, neither insufficient nor excessive, are maintained to support strategic execution. |
| **2. Market risk** | Market risk comprises traded market risk and Interest Rate Risk in the Banking Book (**IRRBB**).<br><br>Traded market risk is the risk of losses in the Group's Trading Book owing to changes in the general level of market prices, including interest rates and foreign exchange rates.<br><br>IRRBB is the risk of loss in earnings or in the economic value of the Banking Book due to movements in interest rates.<br><br>Traded market risk arises from positions held in the Group's Trading Book, including securities held for both trading and liquidity management and foreign exchange trading. Foreign exchange trading is undertaken primarily for the purpose of providing the Group's customers with access to foreign exchange markets. Trading book positions include approved financial instruments, both physical and derivatives.<br><br>The Group takes a prudent approach to the management of IRRBB, balancing earnings and economic value within a Board-approved risk appetite. Measurement of IRRBB includes credit spread risk, associated principally with the Group's holdings of liquid assets. |

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## Financial risks (continued)

| | |
|---|---|
| **3. Liquidity risk** | Liquidity risk is the inability to access funds, both anticipated and unforeseen, which may lead to the Group being unable to meet its obligations in an orderly manner as they arise.<br>Liquidity risk is managed in accordance with the Board-approved RAS, Group Funding Strategy and Group Liquidity Risk Management Policy, to ensure that all cash flow commitments are met in a timely manner and prudential requirements are satisfied.<br>The Group maintains a portfolio of HQLA to cover projected net cash outflows over a 30-day period under the stress scenario assumptions prescribed by the LCR in APRA Prudential Standard 210. The Group also monitors the stability and composition of its funding profile, including compliance with APRA's NSFR minimum requirement.<br>A trigger framework supports the liquidity risk management process, identifying emerging risks or vulnerabilities in the Group's liquidity position.<br>The Group undertakes stress testing and scenario analysis to evaluate the Group's ability to withstand stressed conditions across a variety of durations and severities. |
| **4. Credit risk** | Credit risk includes credit risk and counterparty credit risk.<br>The Group is predominantly exposed to credit risk as a result of its lending activities. Credit risk is defined as the risk of loss of principal, interest and/or fees and charges resulting from a borrower failing to meet a credit commitment.<br>The Group maintains a Credit Risk Management Framework and supporting policies to ensure and facilitate effective management of credit risk and the maintenance of acceptable asset quality. The Board has set a risk appetite for the maximum amount of credit risk that it is willing to take, based on a percentage of the Group's capital that has been allocated to credit risk. Credit risk appetite is reviewed and recommended by the MCC and ultimately approved by the BRC and/or Board. Stress testing is also undertaken on key portfolios to support prudent management of credit risks.<br>Authority to officers to approve credit risk exposures is provided via a Delegated Lending Authority. The Group utilises models to support the management of credit risk. Governance of risk models is overseen by the Risk Models Committee (**RMC**) and credit risk models are approved by the Group's MCC.<br>Counterparty credit risk is the risk that a counterparty may default before the final settlement of the transaction's cash flows. This risk is primarily related to the Group's derivatives exposures. Counterparty credit risk is mitigated using margining and central clearing. Financial Risk & Modelling is responsible for monitoring Treasury counterparty credit limits in line with the Group's Counterparty Credit Limit Framework.<br>Regular reporting provides confirmation of the effectiveness of processes and highlights any trends or deterioration which require attention. This enables portfolio monitoring by all levels of management and the Board. Regular reporting is provided to the Group's MCC, and BRC, as well as at relevant Divisional Risk Committees. |

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## Non-financial risks

Non-financial risks arise from the Group's risk taking activities across processes or systems, people, and external events.

| | |
|---|---|
| **5. Operational risk** | Operational risk is the risk of impact on objectives or the risk of loss resulting from inadequate or failed internal processes or systems, the actions or inactions of people, or from external events. Operational risk is inherent in all Bank products, services, activities, processes and systems.<br><br>Operational risk is managed in accordance with the ORMF to identify, assess, act and monitor risks, including important activities to ensure we manage and minimise our risks, such as:<br>• evaluating our environment for threats and challenges, as we strive to achieve our strategic objectives<br>• identifying different types of operational risks, to which we are exposed, or what can go wrong with our products, services and processes<br>• assessing the potential impact to our customers, staff, shareholders, and community if risks materialise<br>• introducing controls or processes to prevent risks from occurring or reduce the impact if they do occur<br>• proactively improving our products, services and processes when there are changes to regulations<br>• closely managing the resilience of our critical operations to avoid or minimise disruptions<br>• when things do go wrong, investigating what happened to understand why errors occurred, and how our customers, staff, shareholders, and community are impacted so that we can learn from our mistakes and prevent recurrences<br>• monitoring and reporting risk information to Executive Management and the Group's Board, to enable them to make risk informed decisions, and ensure we remain adequately capitalised and can absorb unexpected losses. |

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## Non-financial risks (continued)

| | |
|---|---|
| **6. Conduct risk** | Conduct risk is the risk of failing to:<br>• deliver fair outcomes for our customers whilst balancing the outcomes for our shareholders and the communities in which we operate (incl. partners and regulators)<br>• uphold our Code of Conduct<br>• protect market integrity.<br><br>We are committed to the management of conduct risks throughout our business practices, and we do this through applying the Conduct Principles. The Conduct Risk Policy and Principles set the minimum expectations, are relevant to and apply to each employee and, where there is exposure to conduct risk, must be incorporated into business-owned mechanisms.<br>• Key drivers of conduct risk include:<br>• product & service design and distribution processes<br>• customer service failure<br>• firm-level decision making<br>• employee standards and behaviours<br>• market integrity.<br><br>Conduct risk utilises the core Operational Risk Management processes and procedures outlined in the Operational Risk Management Policy (**ORMP**) to identify, assess, action and monitor conduct risks. Identifying conduct risks include through conduct risk related events and systemic complaint themes.<br><br>Assessment of conduct risks include use of the operational risk consequence table, particularly customer impact (number of customers and financial impact) and reputational impact. Whether assessment of the impact results in unbalanced outcomes across our customers, shareholders and communities, and number and category of complaints will inform actions.<br><br>Actions can include reducing the risk exposure by reducing the likelihood and/or consequence of the risk using controls and/or governance mechanisms; where appropriate, customer remediation programs are undertaken and root cause analysis undertaken to identify appropriate actions and learnings.<br><br>The Group must have in place appropriate business-owned mechanisms in order to manage and mitigate their conduct risks, for example, policies, procedures. 2LoD conduct risk is responsible for independently oversighting and monitoring the existence and performance of these mechanisms in adequately managing the conduct risks associated with the business area.<br><br>Conduct risk reporting is provided to management, relevant governance committees, and the Board under the ORMP. |

## Non-financial risks (continued)

| | |
|---|---|
| **7. Data risk** | Data risk is the potential for business loss arising from failure to appropriately govern, manage and maintain the Group's data. This includes but is not limited to customer data, staff data, and the Group's proprietary data.<br>The Group proactively scans internal and external environments to identify current, evolving, and emerging data risks. Data risk utilises the core Operational Risk Management processes and procedures outlined in the ORMP to identify, assess, action and monitor data risks.<br>Risk identification methods include monitoring industry developments, regulatory changes, control assessments, incident and breach reviews, and stakeholder feedback.<br>Data risks are assessed based on their potential impact on the Group's strategic objectives. Key inputs into this assessment include data criticality, applicable internal policies and data standards, compliance requirements, regulatory expectations (for example, CPS 230 Operational Risk Management, CPS 234 Information Security, CPG 235 Managing Data Risk), and control effectiveness. Assessments are informed by data classification, quality assessments, and system dependencies.<br>Actions to manage data risk include applying the Group's Data Risk Management Framework, enforcing data-related policies and standards, implementing control measures, remediating data quality issues, and defining data ownership and accountability. Where risks cannot be fully mitigated, formal risk acceptance processes are followed in accordance with the ORMF.<br>Ongoing oversight is maintained through regular monitoring activities such as control testing, internal audits, and risk reporting. |
| **8. Technology risk** | Technology risk refers to the potential for loss resulting from the failure, misuse, or inadequacy of technology, which could adversely impact the risk associated to any technology that negatively impacts the Group's operations, services, or strategic objectives. This includes risks associated with applications, systems, infrastructure, cyber threats, change management, and third-party technology services.<br>The Group identifies current, emerging, and evolving risks by actively monitoring internal systems and the external technology environment. Technology risk utilises the core Operational Risk Management processes and procedures outlined in the ORMP to identify, assess, action and monitor technology risks.<br>Risk identification is supported through incident management, control testing, vulnerability assessments, audit findings, and intelligence from technology partners and regulators.<br>Technology risks are assessed against potential business impact and likelihood, informed by internal policies, technology architecture, dependency mapping, and compliance with regulatory obligations (for example, CPS 234 Information Security). This includes evaluating risks of system availability, confidentiality, integrity, and third-party technology dependencies.<br>Technology risk is managed through the ORMF, which outlines responsibilities, controls, and escalation protocols. The Group applies risk mitigation strategies including architecture reviews, resilience planning, penetration testing, security controls, and change governance. Where residual risks remain, formal risk acceptance processes are applied in line with the ORMF.<br>Ongoing oversight includes regular monitoring of technology health indicators, control effectiveness, and incidents. Risk reporting is integrated into governance forums including the ORC, BRC, and Divisional Risk Committees, and is supported by defined Technology Risk Appetite Statements and associated indicators. |

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## Non-financial risks (continued)

| | |
|---|---|
| **9. Information security risk** | Information security risk comprises the potential impacts to the Group, our customers and stakeholders arising from the threats and vulnerabilities related to the operation and use of information systems and the environments in which those systems operate. This includes risks of unauthorised access, data breaches, and compromise of sensitive or critical information assets.<br><br>The Group identifies the current, evolving and emerging information security risks by actively monitoring the internal and external threat landscape. Information security risk utilises the core Operational Risk Management processes and procedures outlined in the ORMP to identify, assess, action and monitor information security risks. Threat intelligence, incident data, vulnerability assessments, and regulatory developments are key inputs used to detect and evaluate risk exposures.<br><br>Risks are assessed based on potential impact to confidentiality, integrity, and availability of data and systems. Assessments are informed by defined security policies, risk and control assessments, data classification, and alignment with regulatory requirements, including CPS 234 *Information Security*.<br><br>Information security risk is managed through the Group's Information Security Policy and related standards, and procedures. Controls are implemented to protect systems and data, including network security, encryption, access management, and security awareness. Risk acceptance and treatment processes are followed where applicable.<br><br>Ongoing monitoring includes security event logging, control testing, penetration testing, and incident response. Information security risks and incidents are reported through established governance forums, including the ORC, BRC, BTTC and Technology & Transformation Divisional Risk Committees, ensuring transparency and accountability. |
| **10. Service provider risk** | Service provider risk is the risk of failing to manage service provider relationships and risks appropriately; for example, by not taking appropriate steps to identify and mitigate additional operational risks resulting from the outsourcing and procurement of services or functions.<br><br>Service provider risk utilises the core Operational Risk Management processes and procedures outlined in the ORMP to identify, assess, action and monitor service provider risks.<br><br>The Group has a Service Provider Policy which provides the required steps to manage material service providers including sourcing, onboarding, ongoing monitoring and oversight, and the assessment and treatment of supplier risk. In addition, the Group has a Service Provider Standard which outlines the principles and practices to effectively manage risks arising from the outsourcing of its business activities and functions. The Procurement Standard provides the required steps to manage non-material service providers.<br><br>The Enterprise Procurement function provides advice, support, and oversight throughout the procurement process as well as monitoring and oversight of material service providers, manage policies, procedures, and tools.<br><br>Regular service provider risk reporting follows the ORMF and is provided to ORC, BRC and Divisional Risk Committees.<br><br>Key drivers of service provider risk include inappropriate selection (including due diligence), inappropriate contract (including regulatory non-compliance), service provider performance management and loss of supplier. |

## Non-financial risks (continued)

| | |
|---|---|
| **11. Regulatory and compliance risk** | Regulatory and compliance risk is the risk of adverse customer impact, financial loss or regulatory penalty. It may occur because of inadequate or failed internal processes, people, systems or controls and results in a failure to comply with regulatory obligations or compliance arrangements.<br><br>Regulatory and compliance risk utilises the core Operational Risk Management processes and procedures outlined in the ORMP to identify, assess, action and monitor regulatory and compliance risks. Our focus is on managing compliance obligations, which includes monitoring, oversight and reporting. It also includes maintaining transparent regulator relationships supported by complete, timely and accurate engagement and breach reporting.<br><br>Key drivers include non-compliance with our obligations, timely management of breaches and response to regulatory change and regulator requests or expectations. |
| **12. Financial crime risk** | Financial crime risk is the risk of facilitation of money laundering, sanctions violations, bribery or corruption, and fraud.<br><br>Financial crime risk utilises the core Operational Risk Management processes and procedures outlined in the ORMP to identify, assess, action and monitor financial crime risks.<br><br>Financial crime risk is an inherent risk within financial services, given the ability for staff and external parties to obtain financial advantage for themselves or others. An inherent risk also exists due to systems and internal controls failing to prevent or detect all instances of financial crime.<br><br>The Group has established techniques and capabilities to detect and prevent financial crime and comply with legislation.<br><br>A specialist Financial Crime Risk function is responsible for delivering an overarching framework of programs, policies, and controls to support the organisation in the management of the risk of financial crime. The function includes providing independent advice and oversight across the Group. |

## Strategic risks

Strategic risks arise from the Group's ability to deliver expected Strategic outcomes.

| | |
|---|---|
| **13. Strategic risk** | Strategic risk is the risk that either business decisions or ineffective or inappropriate business plans fail to respond to changes in the environment or fail to appropriately execute strategic initiatives, which impacts our ability to meet our strategic objectives.<br><br>Our focus is on execution of strategic objectives, including consideration of prioritisation and sequencing of initiatives, monitoring delivery against financial and non-financial metrics, and management of investment spend.<br><br>Key drivers of strategic risk management include the Group Risk involvement in strategy setting, the use of the annual emerging risk process and stress testing outcomes, as well as the Risk Appetite Indicators and strategic Key Performance Indicators (KPIs). |
| **14. Environmental, Social, and Governance (ESG) risk** | ESG risk is defined as the risk of failure to appropriately identify and manage material environmental, social and governance risks and opportunities:<br>• environmental risk considers the opportunities and financial risks of climate change by setting strategy to achieve transitional and sustainable outcomes.<br>• social risk considers risks associated with our activities which could lead to adverse outcomes for individuals, communities or society, including the potential result of financial loss, reputational harm, legal liability, or regulatory penalties.<br>• governance risk considers the risk of weaknesses or failures in corporate governance practices, including leadership, decision-making, oversight, conduct, and accountability, and how they could potentially lead to financial loss, reputational harm, strategic failure, legal liability, or regulatory penalties. An example is that our risk appetite excludes lending exposure to coal, coal seam gas, crude oil, natural gas, and native forest logging projects.<br><br>The Group has adopted an approach to assess its most material ESG issues. This approach assesses a range of factors to test and validate our approach and Business Plan on an ongoing basis. This includes: the regulatory environment; monitoring external ESG and sustainability assessments of the Group; monitoring developments in relevant international frameworks and national industry bodies; reviewing customer complaints; updating the Group's Social Issues Register; reviewing ESG and sustainability themes emerging from banking sector Annual General Meetings; and conducting the Group's annual materiality process.<br><br>The approach has informed the transition of the Group's inaugural ESG Framework to an enterprise-wide ESG and Sustainability Business Plan. This Business Plan provides detail on ESG initiatives, provides clarity on accountabilities, and includes public commitments to help us measure our performance.<br><br>The Business Plan demonstrates alignment to the Group's vision, purpose, and strategic imperatives, but also identifies how ESG and sustainability risks are managed, and which policies and positions guide our approach.<br><br>The Business Plan reflects that climate change and its impacts will increasingly play a role across our environment, social and governance programs and therefore identifies a climate change approach as a point of risk and opportunity for the Group. It also identifies programs of work to manage our environment, social and governance approaches. This is how we maintain our social licence to operate and ensures the Group remains a responsible and ethical business. |

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## Stress Testing

Stress testing is a core component of the Group's risk management approach. It is also an integral component of the GRMF. Stress testing informs our strategic objectives, risk appetite, and capital / liquidity target requirements. It primarily utilises modelling and quantitative capabilities and incorporates practical qualitative judgement from subject matter experts.

Stress testing is integrated and aligned with key risk management and business processes.

The Group periodically undertakes the following distinct types of testing:

| Stress Test Type | Description |
|---|---|
| **Individual material risk** | The Group regularly produces stress tests for relevant material risks outlined in the GRMF. The results are monitored by the appropriate committee. Ongoing stress testing of material risks includes credit risk, traded market risk, Interest Rate in the Banking Book (non-traded market risk) and liquidity risk. |
| **ICAAP scenario(s)** | Scenario(s) developed specifically for the purpose of assessing the Group's capital adequacy with a time horizon of at least three years. The risks assessed should focus on the risks most relevant to the Group. |
| **Internal Enterprise-wide Stress Test (IEWST)** | The stress scenario is typically a severe but plausible macro-economic, industry, and/or Group specific shock that examines a minimum three-year time horizon.<br>The scenario evaluation is conducted across the Group and considers relevant material risks. |
| **APRA-directed stress test** | The Group undertakes any stress tests requested by APRA. |
| **Climate scenario analysis** | Climate scenario analysis helps the Group identify and prepare for the impacts that climate could have on the Group. |
| **Operational risk scenario analysis** | Operational risk scenario analysis is the assessment of infrequent but potentially severe operational risk exposures that arise from particular causes. |

Enterprise-wide stress testing is typically conducted using a base case as a comparator with a defined stress scenario, which is projected on unmitigated and mitigated bases. The Group sets its own scenarios to test idiosyncratic, systemic, or combined risks as well as completes all stress testing exercises mandated by APRA. Stress testing results are presented to the Executive and Board committees.

# DIS20 – OV1 Overview of risk-weighted assets (RWA)

## Amounts are in millions to 1 decimal place

Table OV1 provides a breakdown of RWA and the total RWA forming the denominator of the risk-based capital requirements.

| | | 30 Jun 25 | 31 Mar 25 | 30 Jun 25 |
|---|---|---|---|---|
| | | a | b | c |
| | | RWA | | Minimum capital requirements [1] |
| 1 | Credit risk (excluding counterparty credit risk) | 35,653.5 | 35,524.4 | 2,852.3 |
| 2 | Of which: standardised approach (**SA**) | 35,653.5 | 35,524.4 | 2,852.3 |
| 6 | Counterparty credit risk (**CCR**) | 87.6 | 69.3 | 7.0 |
| 9 | Of which: other CCR | 87.6 | 69.3 | 7.0 |
| 10 | Credit valuation adjustment (**CVA**) | 83.2 | 64.8 | 6.7 |
| 15 | Settlement risk | — | — | — |
| 16 | Securitisation exposures in banking book | 585.8 | 612.2 | 46.8 |
| 18 | Of which: securitisation external ratings-based approach (**SEC-ERBA**), including internal assessment approach (**IAA**) | 96.7 | 89.6 | 7.7 |
| 19 | Of which: securitisation standardised approach (**SEC-SA**) | 489.1 | 522.6 | 39.1 |
| 20 | Market risk | 0.7 | 0.5 | 0.1 |
| 21 | Of which: standardised approach (SA) | 0.7 | 0.5 | 0.1 |
| 21a | Of which: IRRBB | — | — | — |
| 24 | Operational risk | 2,893.7 | 2,893.7 | 231.5 |
| 29 | **Total (1 + 6 + 10 + 15 + 16 + 20 + 24)** | **39,304.5** | **39,164.9** | **3,144.4** |

1. The minimum capital requirement is 8%.

# DIS25 – CC1 Composition of Regulatory Capital

Amounts are in millions to 1 decimal place

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## Table CC1 breaks out the components of regulatory capital.

| | | 30 Jun 25 | 31 Dec 24 | |
|---|---|---|---|---|
| | | a | | b |
| | | Amounts | Amounts | Source based on reference numbers/ letters of the balance sheet under the regulatory scope of consolidation |
| **Common Equity Tier 1 capital: instruments and reserves** | | | | |
| 1 | Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus | 5,203.4 | 5,234.8 | |
| 2 | Retained earnings | 935.9 | 1,441.2 | Table 1 |
| 3 | Accumulated other comprehensive income (and other reserves) | 43.5 | (48.7) | |
| 6 | **Common Equity Tier 1 capital before regulatory adjustments** | **6,182.8** | **6,627.3** | |
| **Common Equity Tier 1 capital: regulatory adjustments** | | | | |
| 8 | Goodwill (net of related tax liability) | 987.2 | 1,526.7 | Table 2 |
| 9 | Other intangibles other than mortgage servicing rights (**MSR**) (net of related tax liability) | 11.4 | 11.7 | |
| 10 | Deferred tax assets (**DTA**) that rely on future profitability, excluding those arising from temporary differences (net of related tax liability) | — | — | |
| 11 | Cash flow hedge reserve | 62.5 | (15.9) | |
| 12 | Shortfall of provisions to expected losses | — | — | |
| 15 | Defined benefit pension fund net assets | — | — | |
| 26 | National specific regulatory adjustments | 798.2 | 761.5 | |
| 27 | Regulatory adjustments applied to Common Equity Tier 1 capital due to insufficient Additional Tier 1 and Tier 2 capital to cover deductions | — | — | |
| 28 | **Total regulatory adjustments to Common Equity Tier 1 capital** | **1,859.3** | **2,284.0** | |
| 29 | **Common Equity Tier 1 capital (CET1)** | **4,323.5** | **4,343.3** | |
| **Additional Tier 1 capital: instruments** | | | | |
| 30 | Directly issued qualifying additional Tier 1 instruments plus related stock surplus | 802.4 | 802.4 | Table 3 |
| 32 | Of which: classified as liabilities under applicable accounting standards | 802.4 | 802.4 | Table 3 |
| 34 | Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group additional Tier 1 capital) | — | — | |
| 36 | Additional Tier 1 capital before regulatory adjustments | 802.4 | 802.4 | Table 3 |

Table continued overleaf

# DIS25 – CC1 Composition of Regulatory Capital (continued)

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## Amounts are in millions to 1 decimal place

| | | 30 Jun 25 | 31 Dec 24 | |
|---|---|---|---|---|
| | | a | | b |
| | | Amounts | Amounts | Source based on reference numbers/ letters of the balance sheet under the regulatory scope of consolidation |
| **Additional Tier 1 capital: regulatory adjustments** | | | | |
| 37 | Investments in own additional Tier 1 instruments | — | — | |
| 39 | Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold) | — | — | |
| 41 | National specific regulatory adjustments | — | — | |
| 42 | Regulatory adjustments applied to additional Tier 1 capital due to insufficient Tier 2 capital to cover deductions | — | — | |
| 43 | **Total regulatory adjustments to additional Tier 1 capital** | **—** | **—** | |
| 44 | **Additional Tier 1 capital (AT1)** | **802.4** | **802.4** | Table 3 |
| 45 | **Tier 1 capital (T1 = CET1 + AT1)** | **5,125.9** | **5,145.7** | |
| **Tier 2 capital: instruments and provisions** | | | | |
| 46 | Directly issued qualifying Tier 2 instruments plus related stock surplus | 575.0 | 575.0 | Table 3 |
| 48 | Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2) | — | — | |
| 50 | Provisions | 286.4 | 297.9 | |
| 51 | **Tier 2 capital before regulatory adjustments** | **861.4** | **872.9** | |
| **Tier 2 capital: regulatory adjustments** | | | | |
| 52 | Investments in own Tier 2 instruments | — | — | |
| 54 | Investments in the capital and other TLAC liabilities of banking, financial and insurance entities that are outside the scope of regulatory consolidation, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold) | — | — | |
| 56 | National specific regulatory adjustments | — | — | |
| 57 | **Total regulatory adjustments to Tier 2 capital** | **—** | **—** | |
| 58 | **Tier 2 capital** | **861.4** | **872.9** | |
| 59 | **Total regulatory capital (= Tier 1 + Tier2)** | **5,987.3** | **6,018.6** | |
| 60 | **Total risk-weighted assets** | **39,304.5** | **38,870.9** | |

Table continued overleaf

# DIS25 – CC1
# Composition of Regulatory Capital
(continued)

**Amounts are in millions to 1 decimal place**

| | | 30 Jun 25 | 31 Dec 24 | |
|---|---|---|---|---|
| | | a | | b |
| | | Amounts | Amounts | Source based on reference numbers/ letters of the balance sheet under the regulatory scope of consolidation |
| **Capital adequacy ratios and buffers** | | | | |
| 61 | **Common Equity Tier 1 capital (as a percentage of risk-weighted assets)** | **11.00%** | **11.17%** | |
| 62 | **Tier 1 capital (as a percentage of risk-weighted assets)** | **13.04%** | **13.24%** | |
| 63 | **Total capital (as a percentage of risk-weighted assets)** | **15.23%** | **15.48%** | |
| 64 | **Institution-specific buffer requirement (capital conservation buffer plus countercyclical buffer requirements plus higher loss absorbency requirement, expressed as a percentage of risk-weighted assets)** [1] | **3.50%** | **3.50%** | |
| 65 | Of which: capital conservation buffer requirement | 2.50% | 2.50% | |
| 66 | Of which: bank-specific countercyclical buffer requirement | 1.00% | 1.00% | |
| 68 | **Common Equity Tier 1 capital (as a percentage of risk-weighted assets) available after meeting the bank's minimum capital requirements** | **6.50%** | **6.67%** | |
| **Applicable caps on the inclusion of provisions in Tier 2 capital** | | | | |
| 76 | Provisions eligible for inclusion in Tier 2 capital in respect of exposures subject to standardised approach (prior to application of cap) | 286.4 | 297.9 | |
| 77 | Cap on inclusion of provisions in Tier 2 capital under standardised approach | 455.1 | 449.7 | |
| 79 | Cap for inclusion of provisions in Tier 2 capital under internal ratings-based approach | — | — | |

1. Total of bank-specific buffer requirements equals the capital conservation buffer (2.5%) plus the CCyB (1.0%).

# DIS25 – CC2
# Reconciliation of regulatory capital to balance sheet

Amounts are in millions to 1 decimal place

Bendigo Bank

Table CC2 shows the bank's regulatory balance sheet and the link between the balance sheet published in the financial statements and the numbers that are used in the composition of capital disclosure template set out in CC1.

| | | 30 Jun 25 | | |
|---|---|---|---|---|
| | | a | b | c |
| | | Balance sheet as in published financial statements | Under regulatory scope of consolidation | Reference |
| **Assets** | | | | |
| 1 | Cash and cash equivalents | 3,400.6 | 3,345.4 | |
| 2 | Due from other financial institutions | 167.0 | 167.0 | |
| 3 | Financial assets at fair value through profit or loss (**FVTPL**) | 8.7 | 3.2 | |
| 4 | Financial assets at amortised cost | 1,813.8 | 1,821.7 | |
| 5 | Financial assets at fair value through other comprehensive income (**FVOCI**) | 8,633.4 | 8,633.4 | |
| 6 | Income tax receivable | 10.8 | 10.8 | |
| 7 | Derivatives | 118.9 | 118.9 | |
| 8 | Net loans and other receivables | 85,708.4 | 83,404.7 | |
| 9 | Investments accounted for using the equity method | 8.4 | 8.4 | |
| 10 | Shares in controlled entities | — | 18.0 | |
| 11 | Property, plant and equipment | 133.5 | 133.5 | |
| 12 | Assets held for sale | — | — | |
| 13 | Deferred tax assets | — | — | |
| 14 | Investment property | 1,108.9 | 1,108.9 | |
| 15 | Goodwill and other intangible assets | 1,430.1 | 1,421.0 | Table 2 |
| 16 | Other assets | 676.4 | 664.0 | |
| 17 | **Total Assets** | **103,218.9** | **100,858.9** | |
| **Liabilities** | | | | |
| 18 | Due to other financial institutions | 281.3 | 281.3 | |
| 19 | Deposits | 83,842.9 | 83,873.5 | |
| 20 | Other borrowings | 9,920.2 | 7,557.3 | |
| 21 | Derivatives | 16.8 | 16.8 | |
| 22 | Amounts payable to controlled entities | — | — | |
| 23 | Income tax payable | — | (6.4) | |
| 24 | Provisions | 117.9 | 117.9 | |
| 25 | Liabilities held for sale | — | — | |
| 26 | Deferred tax liabilities | 43.8 | 43.6 | |
| 27 | Other payables | 951.1 | 951.3 | |
| 28 | Loans Payable to Securitisation Trusts | — | — | |
| 29 | Loan capital | 1,374.6 | 1,374.6 | Table 3 |
| 30 | **Total Liabilities** | **96,548.6** | **94,209.9** | |
| 31 | **Net Assets** | **6,670.3** | **6,649.0** | |
| **Equity** | | | | |
| 32 | Share capital | 5,203.4 | 5,203.4 | |
| 33 | Reserves | 138.7 | 138.7 | |
| 34 | Retained earnings | 1,328.2 | 1,306.9 | Table 1 |
| 35 | **Total Equity** | **6,670.3** | **6,649.0** | |

# DIS25 – CC2
# Reconciliation of regulatory capital to balance sheet (continued)
## Amounts are in millions to 1 decimal place

Tables 1 to 3 below provide reconciliations between Table CC1 and Table CC2.

### Table 1 – Retained earnings

| | 30 Jun 25 | CC1 Reference |
|---|---|---|
| **Retained earnings under regulatory scope of consolidation – Per CC2** | **1,306.9** | |
| Less: Regulatory adjustment (tax effected) | (371.0) | |
| **Retained earnings – Per CC1** | **935.9** | Item 2 |

### Table 2 – Goodwill and other intangible assets

| | 30 Jun 25 | CC1 Reference |
|---|---|---|
| **Goodwill and other intangible assets under regulatory scope of consolidation – Per CC2** | **1,421.0** | |
| Less: Other intangibles net of impairment | (433.8) | |
| **Goodwill (net of related tax liability) – Per CC1** | **987.2** | Item 8 |

### Table 3 – Additional Tier 1 (AT1) and Tier 2 Capital

| | 30 Jun 25 | CC1 Reference |
|---|---|---|
| **Loan capital under regulatory scope of consolidation – Per CC2** | **1,374.6** | |
| Less: Accrued Interest | (5.5) | |
| Add: Cost associated with issuing capital | 8.3 | |
| **Total Additional Tier 1 and Tier 2 Capital** | **1,377.4** | |
| **Of which: Additional Tier 1 capital (AT1)** | **802.4** | Item 44 |
| **Of which: Directly issued qualifying Tier 2 instruments plus related stock surplus** | **575.0** | Item 46 |

# DIS30 – LIA
# Explanations of differences between accounting and regulatory exposure amounts

Table LI1 provides an overview of how the carrying value of assets and liabilities reported within the Group's balance sheet correspond to the regulatory risk categories for exposures other than off-balance sheet items. The main differences between the accounting scope of consolidation prepared in accordance with IFRS 9 accounting standard (column 'a' within LI1) and regulatory scope of consolidation (column 'b' within LI1) are due to the exclusion of non-consolidated entities and external securitisation trusts. A balance sheet value or transaction may be subject to multiple risk types.

The LI2 table presents the main differences between the accounting carrying amounts under the scope of regulatory consolidation and the exposure amounts considered for regulatory purposes. The regulatory exposures include the following additional components:

- Off-balance sheet amounts: include items such as undrawn commitments, contingent liabilities and guarantees. Valuation differences includes:
  - Adjustments to arrive at regulatory credit equivalent amounts for application of risk weights.
  - Potential future exposure amounts and other adjustments to centrally cleared transactions.

# DIS30 – LI1
# Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

Amounts are in millions to 1 decimal place

Bendigo Bank

Table LI1 sets out the differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories.

| | | 30 Jun 25 | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g |
| | | | | Carrying values of items: | | | | |
| | | Carrying values as reported in published financial statements | Carrying values under scope of regulatory consolidation | Subject to credit risk framework [1] | Subject to counterparty credit risk framework | Subject to the securitisation framework [2] | Subject to the market risk framework | Not subject to capital requirements or subject to deduction from capital |
| **Assets** | | | | | | | | |
| 1 | Cash and cash equivalents | 3,400.6 | 3,345.4 | 3,345.4 | — | — | — | — |
| 2 | Due from other financial institutions | 167.0 | 167.0 | 167.0 | — | — | — | — |
| 3 | Financial assets at fair value through profit or loss (**FVTPL**) | 8.7 | 3.2 | — | — | — | — | 3.2 |
| 4 | Financial assets at amortised cost [3] | 1,813.8 | 1,821.7 | 1,253.3 | 116.5 | 451.9 | — | — |
| 5 | Financial assets at fair value through other comprehensive income (**FVOCI**) | 8,633.4 | 8,633.4 | 8,632.3 | — | — | — | 1.1 |
| 6 | Income tax receivable | 10.8 | 10.8 | 10.8 | — | — | — | — |
| 7 | Derivatives [4] | 118.9 | 118.9 | — | 118.6 | 0.3 | 5.1 | — |
| 8 | Net loans and other receivables | 85,708.4 | 83,404.7 | 80,503.7 | — | 2,932.8 | — | (31.8) |
| 9 | Investments accounted for using the equity method | 8.4 | 8.4 | — | — | — | — | 8.4 |
| 10 | Shares in controlled entities | — | 18.0 | — | — | — | — | 18.0 |
| 11 | Property, plant and equipment | 133.5 | 133.5 | 133.5 | — | — | — | — |
| 12 | Assets held for sale | — | — | — | — | — | — | — |
| 13 | Deferred tax assets | — | — | — | — | — | — | — |
| 14 | Investment property | 1,108.9 | 1,108.9 | 578.9 | — | — | — | 530.0 |
| 15 | Goodwill and other intangible assets | 1,430.1 | 1,421.0 | — | — | — | — | 1,421.0 |
| 16 | Other assets | 676.4 | 664.0 | 649.4 | — | 6.2 | — | 8.4 |
| 17 | **Total Assets** | **103,218.9** | **100,858.9** | **95,274.3** | **235.1** | **3,391.2** | **5.1** | **1,958.3** |

Table continued overleaf

# DIS30 – LI1
# Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories (continued)

**Amounts are in millions to 1 decimal place**

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| | | 30 Jun 25 | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g |
| | | | | Carrying values of items: | | | | |
| | | Carrying values as reported in published financial statements | Carrying values under scope of regulatory consolidation | Subject to credit risk framework [1] | Subject to counterparty credit risk framework | Subject to the securitisation framework [2] | Subject to the market risk framework | Not subject to capital requirements or subject to deduction from capital |
| **Liabilities** | | | | | | | | |
| 18 | Due to other financial institutions | 281.3 | 281.3 | — | — | — | — | 281.3 |
| 19 | Deposits | 83,842.9 | 83,873.5 | — | — | 52.2 | — | 83,821.3 |
| 20 | Other borrowings | 9,920.2 | 7,557.3 | — | — | — | — | 7,557.3 |
| 21 | Derivatives [5] | 16.8 | 16.8 | — | (142.6) | — | 9.0 | 159.4 |
| 22 | Amount payable to controlled entities | — | — | — | — | — | — | — |
| 23 | Income tax payable | — | (6.4) | — | — | — | — | (6.4) |
| 24 | Provisions | 117.9 | 117.9 | — | — | — | — | 117.9 |
| 25 | Liabilities held for sale | — | — | — | — | — | — | — |
| 26 | Deferred tax liabilities | 43.8 | 43.6 | — | — | — | — | 43.6 |
| 27 | Other payables | 951.1 | 951.3 | — | — | — | — | 951.3 |
| 28 | Loans Payable to Securitisation Trusts | — | — | — | — | — | — | — |
| 29 | Loan capital | 1,374.6 | 1,374.6 | — | — | — | — | 1,374.6 |
| 30 | **Total Liabilities** | **96,548.6** | **94,209.9** | **—** | **(142.6)** | **52.2** | **9.0** | **94,300.3** |

1. Carrying values are exposure amounts pre CCF and CRM.
2. Carrying values for column e exclude Internal RMBS Trusts and Redraw facilities.
3. Carrying values for column d include Initial Margin for Central Counterparties.
4. Carrying values for column d include Gross Current Credit Exposure and Variation Margin (VM) received for Central Counterparties.
5. Carrying values for column d include VM posted for Central Counterparties and VM amounts need to be expressed as a negative amount given it is a liability.

# DIS30 – LI2
# Main sources of differences between regulatory exposure amounts and carrying values in financial statements
### Amounts are in millions to 1 decimal place

Bendigo Bank

Table LI2 provides information on the main sources of differences between the financial statements' carrying value amounts and the exposure amounts used for regulatory purposes.

| | | 30 Jun 25 | | | | |
|---|---|---|---|---|---|---|
| | | a | b | c | d | e |
| | | | Items subject to: | | | |
| | | Total | Credit risk framework | Securitisation framework [2] | Counterparty credit risk framework | Market risk framework |
| 1 | **Asset carrying value amount under scope of regulatory consolidation (as per Template LI1)** | **98,900.6** | **95,274.3** | **3,391.2** | **235.1** | **5.1** |
| 2 | Liabilities carrying value amount under regulatory scope of consolidation (as per Template LI1) | (90.4) | — | 52.2 | (142.6) | 9.0 |
| 3 | **Total net amount under regulatory scope of consolidation (row 1 – row 2)** | **98,991.0** | **95,274.3** | **3,339.0** | **377.7** | **(3.9)** |
| 4 | Off-balance sheet amounts [1] | 11,629.0 | 11,592.8 | 36.2 | — | |
| 5 | Differences in valuations (incl. adjustments) | (5,752.4) | (5,843.1) | — | 90.7 | |
| 6 | Differences due to different netting rules, other than those already included in row 2 | (3,438.3) | (3,438.3) | — | — | |
| 7 | Differences due to consideration of provisions | — | — | — | — | |
| 8 | Differences due to prudential filters | — | — | — | — | |
| 10 | **Exposure amounts considered for regulatory purposes** | **101,429.3** | **97,585.7** | **3,375.2** | **468.4** | |

1. Carrying values for column d include the difference between the Credit Equivalent Amount and the Gross Current Credit Exposure for Central Counterparties.
2. Column c excludes internal Securitisation Trusts.

# DIS31 – ENC
# Asset encumbrance

## Amounts are in millions to 1 decimal place

Bendigo Bank

Table ENC distinguishes between assets used for funding or collateral purposes ('encumbered assets') and those that are 'unencumbered.' The values presented in the table reflect the carrying amounts from the balance sheet using end-of-period figures.

The Group has the following sources of encumbrance:

**Assets pledged under repurchase agreements:** Collateralised financing transactions conducted via repurchase agreements represent a type of short-term funding. The collateral utilised for these transactions consists of debt securities.

**Covered bonds:** The Group manages several covered bond programs aimed at generating funding within primary markets.

**External Securitisation:** The Group's securitisation program enables the securitisation of residential mortgages. APRA also requires banks to secure a minimum of 5% ownership of the RMBS trusts as risk retention pools.

| | | 30 Jun 25 | | |
|---|---|---|---|---|
| | | a | c | d |
| | | Encumbered assets | Unencumbered assets | Total [1] |
| 1 | Cash and cash equivalents [2] | 2,608.0 | 809.4 | 3,417.4 |
| 2 | Due from other financial institutions | — | 167.0 | 167.0 |
| 3 | Financial assets at fair value through profit or loss (**FVTPL**) | — | 3.2 | 3.2 |
| 4 | Financial assets at amortised cost [3] | 898.8 | 905.5 | 1,804.3 |
| 5 | Financial assets at fair value through other comprehensive income (**FVOCI**) | — | 8,633.4 | 8,633.4 |
| 6 | Income tax receivable | — | 10.8 | 10.8 |
| 7 | Derivatives | — | 118.9 | 118.9 |
| 8 | Net loans and other receivables [4] | 7,705.2 | 78,003.2 | 85,708.4 |
| 9 | Investments accounted for using the equity method | — | 8.4 | 8.4 |
| 10 | Shares in controlled entities | — | 18.0 | 18.0 |
| 11 | Property, plant and equipment | — | 133.5 | 133.5 |
| 12 | Assets held for sale | — | — | — |
| 13 | Deferred tax assets | — | — | — |
| 14 | Investment property | — | 1,108.9 | 1,108.9 |
| 15 | Goodwill and other intangible assets | — | 1,421.0 | 1,421.0 |
| 16 | Other assets [5] | 129.2 | 532.2 | 661.4 |
| 17 | **Total** | **11,341.2** | **91,873.4** | **103,214.6** |

1. The Total Exposure includes the Assets under scope of Regulatory Consolidation plus any Securitisation assets outside of the Level 2 Group.
2. Cash and cash equivalents encumbered assets include reverse repurchase debt securities with central borrowing authorities.
3. Financial assets at amortised cost includes reverse repurchase debt securities with central borrowing authorities.
4. Net loans and other receivables includes covered bonds, non-internal securitisation trusts in and out of the Level 2 Group.
5. Other assets includes accrued interest for covered bonds, non-internal securitisation trusts in and out of the Level 2 Group.

Encumbered assets have increased overall by $2,610.8 million to $11,341.2 million in June 2025 (December 2024: $8,730.4 million) predominantly due to an increase in Net loans and other receivables following the sale of assets into the covered bond cover pool as well as a securitisation issuance.

# DIS31 – ENC
## Asset encumbrance (continued)
### Amounts are in millions to 1 decimal place

Bendigo Bank

| | | 31 Dec 24 | | |
|---|---|---|---|---|
| | | a | c | d |
| | | Encumbered assets | Unencumbered assets | Total [1] |
| 1 | Cash and cash equivalents [2] | 2,396.0 | 1,562.7 | 3,958.7 |
| 2 | Due from other financial institutions | — | 274.6 | 274.6 |
| 3 | Financial assets at fair value through profit or loss (**FVTPL**) | — | 7.1 | 7.1 |
| 4 | Financial assets at amortised cost [3] | 564.2 | 875.9 | 1,440.1 |
| 5 | Financial assets at fair value through other comprehensive income (**FVOCI**) | — | 9,246.5 | 9,246.5 |
| 6 | Income tax receivable | — | 48.3 | 48.3 |
| 7 | Derivatives | — | 64.5 | 64.5 |
| 8 | Net loans and other receivables [4] | 5,753.2 | 77,603.6 | 83,356.8 |
| 9 | Investments accounted for using the equity method | — | 8.3 | 8.3 |
| 10 | Shares in controlled entities | — | 18.0 | 18.0 |
| 11 | Property, plant and equipment | — | 131.7 | 131.7 |
| 12 | Assets held for sale | — | — | — |
| 13 | Deferred tax assets | — | — | — |
| 14 | Investment property | — | 1,099.6 | 1,099.6 |
| 15 | Goodwill and other intangible assets | — | 1,930.1 | 1,930.1 |
| 16 | Other assets [5] | 17.0 | 526.0 | 543.0 |
| 17 | **Total** | **8,730.4** | **93,396.9** | **102,127.3** |

1. The Total Exposure includes the Assets under scope of Regulatory Consolidation plus any Securitisation assets outside of the Level 2 Group.
2. Cash and cash equivalents encumbered assets includes reverse repurchase debt securities with central borrowing authorities.
3. Financial assets at amortised cost assets includes reverse repurchase debt securities with central borrowing authorities.
4. Net loans and other receivables includes covered bonds, non-internal securitisation trusts in and out of the Level 2 Group.
5. Other assets includes accrued interest for covered bonds, non-internal securitisation trusts in and out of the Level 2 Group.

# DIS40 – CRA General qualitative information about credit risk

Bendigo Bank

## General disclosure

Credit risk is defined as the risk of loss of principal, interest and/or fees and charges resulting from a borrower failing to meet a credit commitment.

When assessing credit risk, we focus on understanding primary cashflows and capacity of the customer to repay. Exposures are generally supported by collateral. This can include residential and commercial property, cash, guarantees and general or specific charges over assets. Each of these provide a secondary exit should the customer fail to repay their debt.

## Management of credit risk

Core functions for the management of credit risk are outlined in the Credit Risk Management Framework and include:

- **Credit Risk Policy** – outlines how we manage and control our exposure to credit risk. Establishes standards for assessing, approving and monitoring credit aligned with risk appetite and regulatory requirements. Credit Risk Policy is owned and managed by Line 2 and facilitated by the Credit Policy Committee under delegation from the MCC. Credit Risk Policy is supported by procedures and/or systemised controls.
- **Credit Decisioning** – Individual exposures are decisioned by DLA holders in Line 1 and Line 2. Complex credit applications and applications that may not meet all requirements of policy are decisioned by experienced credit professionals in Line 2. Large exposures are approved by the Management Credit Decisioning Committee.
- **Origination and Core Banking Platforms** – used to facilitate the capture of data and to originate lending via assessment of credit risk using data and documentation, risk models and credit decisioning. The origination platforms are linked to the core banking platforms to enable ongoing review, monitoring and reporting.
- **Risk Models** – we use models to support the management of credit risk, such as measuring the probability of default. Owned and managed by Line 2, governance of risk models is overseen by the Risk Models Committee. Models are approved by the MCC.
- **Risk Systems and Procedures** – tools, procedures and processes used to identify, measure, assess, record, monitor and report credit risk. Where deteriorating loan performance is identified, it is managed via proactive intervention through Mortgage Help (consumer exposures) and Asset Management (commercial exposures) within Line 2. Regular reporting is provided to the MCC.
- **Portfolio Reporting and Monitoring** – Regular reporting ensures effectiveness of processes, risk appetite and credit quality. Additionally, it highlights any trends or deterioration which require attention. This enables portfolio monitoring by all levels of management and the Board. Regular reporting is provided to the MCC and BRC, as well as at relevant Divisional Risk Committees.

## Oversight

Credit risk oversight includes:

- **Hindsight Review** – independently undertaken, oversees the decisioning process undertaken by DLA holders. Unsatisfactory findings are reviewed by the Lending Standards Review Committee, with outcomes reported to the MCC.
- **Credit Risk Assurance** – oversees the effectiveness and execution of the Credit Risk Management Framework, with respect to regulatory and legislative obligations, risk appetite, policy settings and other controls. Outcomes are reported to the MCC and BRC.
- **Model Validation** – assesses the accuracy and reliability of the Group's risk models by evaluating their assumptions, methodologies and outputs.
- **Group Internal Audit (GIA)** – has unrestricted access to the first and second lines, enabling objective assessment of the risk and control environment. GIA operates independently and reports to the Board Audit Committee.· Board Oversight – as noted above, oversight as via regular reporting is provided by MCC to BRC.
- **Board Oversight** – as noted above, oversight via regular reporting is provided by MCC to BRC and in the CRO monthly report to the Board.

# DIS40 – CR1
# Credit quality of assets
## Amounts are in millions to 1 decimal place

Bendigo Bank

Table CR1 presents a breakdown of the performing and non-performing exposures, along with the related provisions for credit losses. The reported exposures consist of on-balance sheet financial assets and off-balance sheet exposures that are subject to the credit risk framework.

| | | 30 Jun 25 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | g |
| | | Gross carrying values of | | | Of which ECL accounting provisions for credit losses on SA exposures | | |
| | | Non-performing exposures [1] | Performing exposures | Allowances/ impairments | Allocated in regulatory category of Specific [2] | Allocated in regulatory category of General | Net values (a+b-c) |
| 1 | Loans | 1,186.5 | 82,592.3 | 362.2 | 75.8 | 286.4 | 83,416.6 |
| 2 | Debt Securities | — | 9,066.8 | — | — | — | 9,066.8 |
| 3 | Off-balance sheet exposures [3] | 15.8 | 11,577.0 | — | — | — | 11,592.8 |
| 4 | **Total** | **1,202.3** | **103,236.1** | **362.2** | **75.8** | **286.4** | **104,076.2** |

| | | 31 Dec 24 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | g |
| | | Gross carrying values of | | | Of which ECL accounting provisions for credit losses on SA exposures | | |
| | | Non-performing exposures [1] | Performing exposures | Allowances/ impairments | Allocated in regulatory category of Specific [2] | Allocated in regulatory category of General | Net values (a+b-c) |
| 1 | Loans | 907.6 | 81,047.3 | 368.5 | 70.6 | 297.9 | 81,586.4 |
| 2 | Debt Securities | — | 9,684.0 | — | — | — | 9,684.0 |
| 3 | Off-balance sheet exposures [3] | 14.2 | 12,882.6 | — | — | — | 12,896.8 |
| 4 | **Total** | **921.8** | **103,613.9** | **368.5** | **70.6** | **297.9** | **104,167.2** |

1. 'Non-performing exposures' defined in APRA Prudential Standard APS 220 Credit Risk Management.
2. 'Regulatory category of specific provisions' includes ECL accounting provisions for credit losses held against Stage 3 and Stage 2 exposures that are under-performing. An ECL is not computed for off-balance sheet exposures or debt securities.
3. 'Off-balance sheet exposures' are gross of any credit conversion factor (**CCF**) or credit risk mitigation (**CRM**) techniques.

# DIS40 – CR2
# Changes in stock of non-performing loans and debt securities

**Amounts are in millions to 1 decimal place**

Bendigo Bank

Table CR2 presents the key factors contributing to the movements in non-performing exposures between the current and prior reporting periods. The reported exposures consist of on- and off-balance sheet exposures that are subject to the credit risk framework.

| | | 30 Jun 25 |
|---|---|---|
| | | a[1] |
| 1 | Non-performing loans and debt securities at end of the previous reporting period | 921.8 |
| 2 | Loans and debt securities that have been flagged as non-performing since the last reporting period | 718.0 |
| 3 | Returned to performing status | (206.2) |
| 4 | Amounts written off[2] | (2.7) |
| 5 | Other changes[3] | (228.6) |
| 6 | Non-performing loans and debt securities at end of the reporting period[4] | 1,202.3 |

1. Includes off-balance sheet exposures where the exposure amount is pre CCF and CRM.
2. Write-offs that have been provided for are excluded from this category.
3. Other changes primarily include repayments and changes in counterparties.
4. Represents gross movements flagged as non performing or returned performing status during period.

# DIS40 – CRB
# Qualitative information related to the credit quality of assets

Bendigo Bank

## Non-Performing

For accounting purposes, exposures are impaired when there is doubt as to whether the full amounts due (interest and principal) will be paid promptly. This includes exposures that are 90 days or more past due. It also applies to exposures that are not 90 days or more past due, but are deemed unlikely to be repaid in full without realising collateral, or through other means.

Exposures are classified as 'non-performing' for APRA reporting purposes in line with the requirements of Prudential Standard APS 220: Credit Risk Management. In addition to the aforementioned definition of 'impaired', it also includes the following categories:

- Where a non-individual counterparty has one or more exposures that are non-performing. In this case, all exposures to that counterparty are deemed non-performing.
- Where an exposure is no longer past due 90 days or more, it is still classified as non-performing until it has made all scheduled repayments (or in the case of a revolving facility, remained within its contractual limit) for at least 90 continuous days, except for exposures subject to a material restructure in which case the minimum performance period is six months.
- Where an exposure has been subject to a distressed restructure that will result in an economic loss to the Bank. This could be due to the material forgiveness or postponement of principal, interest or fees.

As a result, the value of exposures classified as non-performing for APRA purposes is larger than those classified as impaired for accounting purposes.

Where an exposure is 90 days or more past due, it is classified as non-performing.

## Non-Performing, Provisions and Write-offs

An exposure that meets the default definition of APS 220 is considered non-performing. We split 'non-performing' into 2 categories:

- **Non-performing past due** – The customer has failed to pay any amount due in full under the loan agreement on the date it was due.
- **Non-performing default** – The customer is unlikely to repay their credit obligation in full, without us resorting to enforcement action of available security. 'Non-performing default' also applies when a customer is 90 days past due.

For non-performing loans, we raise two types of provisions:

- **Collective provisions** – A collective provision is needed for loans not in default at the reporting date, but historic loss experience demonstrates that there is potential for impairment.
- **Specific provisions** – Raised for customers where a loss is expected. All provisions for impairment are assessed on an individual basis. This is in accordance with Australian Accounting Standards.

Loans are written off once the proceeds of the security, recovery actions against the customer, guarantor (as applicable) and Lenders Mortgage Insurance (as applicable) have been received and applied to the secured loan. In these cases, any specific provision previously booked in relation to the loan is released.

Our Mortgage Help team manage non-performing consumer and micro business (<$500,000) loans. All other non-performing commercial teams are managed by the Group's Asset Management Unit.

## Determination of Accounting Provisions for Credit Losses

The Bank has adopted an Expected Credit Loss (**ECL**) accounting model to determine accounting provisions for credit losses since 2018. This is compliant with the AASB 9 standards, which is the Australian equivalent of the global IFRS 9 accounting standards. Under the IFRS 9 accounting standard, businesses are required to assess and recognise ECL on financial assets from the point of origination or purchase, and to update the assessment at each reporting date, reflecting changes in the credit risk of the financial asset. AASB 9 requires outcomes to be forward looking, with the following principles applied when determining the Bank's collective provisions:

- Collective provisions are determined under different macroeconomic scenarios.
- Macroeconomic scenarios are derived by forecasting macroeconomic factors; for example, movements in unemployment rates, Gross Domestic Product, interest rates, etc. under different economic environments.
- Probabilities are assigned to each macroeconomic scenario, which measures the likelihood of the scenario unfolding.
- The final collective provision is a probability-weighted average of the collective provisions outcomes for each macroeconomic scenario.

AASB 9 requires compliant institutions to capture changes in risk profile through the categorisation of loans into one of three 'stages':

- **Stage 1 – Performing and maintaining credit quality since origination**
  Stage 1 exposure for AASB 9 purposes are those assets performing in line with expectations in place at the point of origination or acquisition. This includes new originations or purchased assets (from the point of initial origination), but excludes exposures deemed credit impaired at point of origination. Businesses must recognise an impairment allowance equal to 12 months' ECL which is treated as general provisions. This allowance must be raised at point of initial reporting of an asset and the assessment updated at each subsequent reporting point.
- **Stage 2 – In arrears or showing significant increase in credit risk**
  Assets classified as stage 2 exposures for AASB 9 purposes are those where credit risk has significantly increased compared with expectations at the point of origination/acquisition, but which are not yet considered 'credit impaired'. Businesses must undertake regular assessments to identify whether a significant increase in credit risk has occurred since initial recognition through:
  - Quantitative testing – Where the 12-month behavioural probability of default (**PD**) or rating for an individual exposure at the latest reporting date shows a material deterioration compared with that at the origination or acquisition point, then the assets must be classified under stage 2 as having significantly increased credit risk. The assessment of materiality depends on the portfolio. For retail exposures, a doubling and 50 basis points increase in PD would suffice to trigger the exposure into Stage 2 while a 2-notch downgrade in rating is used for non-retail exposures.
  - Qualitative testing – Any exposure subject to a hardship arrangement or on a watchlist is deemed to show a significant increase in credit risk and will therefore transition to stage 2.
  - Backstop criteria – Exposures that are between 30 days and 90 days past contractual payment due date at the reporting date must be classified as stage 2 assets without exception.

A probation period of 3 months is applied to loans in stage 2. That is, the triggers mentioned above need to be reversed for a period of 3 months before a loan can be reclassified as stage 1. Businesses must recognise an impairment allowance equal to the lifetime ECL which is treated as general provisions. This increased allowance must be recognised at the first reporting point following entry to stage 2 and the assessment updated at each subsequent reporting date.

- **Stage 3 – Credit impaired**

Corresponds to actual credit impairment. The Group must raise an impairment allowance equivalent to the latest assessment of lifetime expected credit losses. This ECL is treated as a specific (individual) provision for regulatory purposes.

The determination of the Bank's collective provision is applied for all financial assets held at amortised cost or fair value through other comprehensive income. The Bank adapts, where appropriate, credit risk models developed for the Internal Ratings-Based (**IRB**) approach under Basel II.

There are certain portfolios that are not modelled for AASB 9 purposes. This is because they are not considered for advanced treatment under Basel II. Alternatively, there isn't enough data available to model these portfolios on a stand-alone basis. To determine a collective provision for these portfolios, loss rates on appropriate sub-portfolios of the Bank's major portfolios are used as a proxy. Currently, the Bank does not have any exposures subject to prescribed provisioning.

In addition to the modelled ECL, the Bank might also raise post-model adjustments to address model weaknesses, or to account for situations where known or expected risk factors and information have not been considered in the modelling process. The quantification of these adjustments can be either qualitative in consultation with management, or quantitative where appropriate adjustments are made to the models.

## Determination of Specific (individual) Provisions

Upon the initial recognition of an impaired loan, a provision may be created by way of a charge against profit and loss. This amount is the difference between the carrying amount of an impaired facility and the discounted estimate future cash flows on the facility. Provisions are assessed as soon as the Group becomes aware that it is unlikely to recover the full amount owing. A collective provision is required for loans that are not specifically provisioned at the reporting date.

*Specific provisions include:*

- All provisions for impairment assessed by the Group on an individual basis in accordance with Australian Accounting Standards
- All collective provisions raised against loans in stage 3
- Any provisions not already charged against profit and loss which the Group is required to recognise as a specific provision. This includes any provisions held against off-balance sheet facilities. These are required to be treated as impaired facilities.

*Specific Provisions are applied as outlined below:*

- **Secured loans** – Any loan with security where it has been identified there is some doubt as to the full recoverability of the loan. The provision amount is assessed on a case-by-case basis taking into consideration factors such as realisable value of security or other credit mitigants, the likely return available upon liquidation or bankruptcy, legal uncertainties, estimated costs involved and the amount of time involved in recoveries.
- **Unsecured facilities >90 days past due** – Where the balance is >$50,000 or where it has already been identified that the customer is suffering financial difficulty, and doubt has been raised about the customer's ability to repay.
- **Unsecured facilities (agribusiness)** – A full provision applies to all unsecured facilities that are 90 days past due or where it has already been identified that the customer is suffering financial difficulty, and doubt has been raised about the customer's ability to repay.
- **Revolving credit facilities** – The increasing of an overdraft limit does not exclude the facility from being classified as impaired unless the Group can justify the soundness of the credit extension decision, and that the customer can meet their obligations under the higher limit.
- **Margin lending** – Daily reconciliation of security cover identifies a customer who has breached the Group's debt to security ratio. In this event the customer is 'Margin Called' and can choose to either
  - settle the margin call
  - top up security; or
  - sell down.

  Generally, the maximum time permitted for a customer to return to order is 24 hours. Failing this, the underlying securities are sold and if they are sold for less than the outstanding loan amount then the file is transferred to the Asset Management Unit who will then attempt to make a payment arrangement with the Group's customer or seek additional security over the remaining debt. Failing this, a specific provision will be raised.

- **Securitisation Trust Note (Business Customers only)** – When an event of default occurs such as:
  - a program covenant(s) is breached
  - actual arrears/loss ratio exceeds the agreed trigger ratio and is not remediated as required
  - 1st loss subordinated note is not maintained at the agreed level or ratio
  - servicer/originator financial performance is deemed unsatisfactory
  - monetary default/fraud.

The Group's Trust Note is then impairment-tested based upon the probability of default assigned to each loan within the portfolio and the net present value of expected future cashflows. Any loss on the Trust Note is treated as an impairment loss rather than a lending provision.

At all times the Bank must ensure that specific provisions are maintained at prudent levels and reflect the level of impairment and estimated future credit losses.

## Restructured Definition

The Bank uses a definition of restructured exposures in line with the requirements of APS 220, being exposures where the original contractual terms have been modified to provide for non-commercial concessions related to the financial difficulties of a customer and would not be offered to new customers with similar risk.

# DIS40 – CRB
# Quantitative information related to the credit quality of assets
## Amounts are in millions to 1 decimal place

Bendigo Bank

Table CRB supplements the quantitative templates with information on the credit quality of a bank's assets:

- Breakdown of exposures by geographical areas, industry and residual maturity.
- Amounts of impaired exposures (according to the definition used by the bank for accounting purposes) and related accounting provisions, broken down by geographical areas and industry.
- Ageing analysis of accounting past-due exposures.
- Breakdown of restructured exposures between impaired and not impaired exposures.

### Breakdown of exposures by residual maturity.

| | | 30 Jun 25 |
|---|---|---|
| | Residual maturity | Gross carrying values of |
| 1 | Revolving / On Demand | 11,385.2 |
| 2 | < 1 year | 5,290.3 |
| 3 | 1 to 5 years | 14,921.8 |
| 4 | > 5 years | 72,841.1 |
| 5 | **Total** | **104,438.4** |

### Ageing analysis of accounting past-due exposures.

| | | 30 Jun 25 | | | 31 Dec 24 | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | 30 to 89 days | 90+ days | Total | 30 to 89 days | 90+ days | Total |
| 1 | Loans | 574.2 | 898.9 | 1,473.1 | 453.4 | 677.1 | 1,130.5 |
| 2 | Debt Securities | — | — | — | — | — | — |
| 3 | Off Balance Sheet | 3.9 | 6.2 | 10.1 | 3.1 | 7.1 | 10.2 |
| 4 | **Total** | **578.1** | **905.1** | **1,483.2** | **456.5** | **684.2** | **1,140.7** |

# DIS40 – CRB
# Quantitative information related to the credit quality of assets (continued)
### Amounts are in millions to 1 decimal place

Bendigo Bank

Breakdown of exposures, non-performing and related accounting provisions by industry.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | | | ECL accounting provisions for credit losses on SA exposures | |
| | **Industry** | **Gross carrying values** | **of which non-performing** | **Allocated in regulatory category of specific** | **Allocated in regulatory category of general** |
| 1 | Consumer Lending | 70,414.5 | 646.1 | 26.0 | 145.3 |
| 2 | Margin Lending | 3,698.2 | — | — | — |
| 3 | Agriculture, Forestry and Fishing | 9,221.3 | 382.8 | 20.2 | 40.5 |
| 4 | Non-residential building construction | 82.8 | 3.4 | — | 1.2 |
| 5 | Residential building construction | 274.2 | 9.0 | 3.5 | 2.1 |
| 6 | Other construction | 467.6 | 7.7 | 0.2 | 10.6 |
| 7 | Information Media and Telecommunications | 15.7 | 0.8 | — | 0.2 |
| 8 | Manufacturing | 232.3 | 6.9 | 2.4 | 3.7 |
| 9 | Mining | 55.0 | 0.5 | — | 0.3 |
| 10 | Accommodation and Food Services | 262.8 | 7.1 | 1.3 | 3.0 |
| 11 | Administrative and Support Services | 41.1 | 0.1 | — | 0.2 |
| 12 | Arts and Recreation Services | 111.2 | 1.3 | — | 0.9 |
| 13 | Education and Training | 221.6 | 0.4 | 0.1 | 1.3 |
| 14 | Electricity, Gas, Water and Waste Services | 27.6 | 0.4 | — | 0.4 |
| 15 | Financial and Insurance Services | 9,744.7 | 8.7 | 2.0 | 4.0 |
| 16 | Health Care and Social Assistance | 548.7 | 0.9 | — | 5.4 |
| 17 | Other Services | 244.1 | 3.5 | 0.3 | 1.8 |
| 18 | Professional, Scientific and Technical Services | 324.4 | 7.9 | 2.9 | 4.9 |
| 19 | Public Administration and Safety | 2,838.8 | 0.3 | — | 0.3 |
| 20 | Rental, Hiring and Real Estate Services | 4,886.1 | 103.7 | 13.8 | 49.2 |
| 21 | Retail Trade | 353.9 | 5.2 | 0.2 | 2.9 |
| 22 | Wholesale Trade | 179.3 | 2.6 | 0.4 | 2.7 |
| 23 | Transport, Postal and Warehousing | 192.5 | 3.0 | 2.5 | 5.5 |
| 24 | **Total** | **104,438.4** | **1,202.3** | **75.8** | **286.4** |

Breakdown of restructured exposures between impaired and not impaired exposures.

| | | 30 Jun 25 | | |
|---|---|---|---|---|
| | | Total exposure | | |
| | | a | b | |
| | | **Performing** | **Non-performing** | **Total restructured exposure** |
| 1 | Restructured | — | 83.7 | 83.7 |

# DIS40 – CRB Quantitative information related to the credit quality of assets (continued)

**Amounts are in millions to 1 decimal place**

Breakdown of exposures, non-performing and related accounting provisions by geography.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | | | ECL accounting provisions for credit losses on SA exposures | |
| State [1] | | Gross carrying values of | of which non-performing | Allocated in regulatory category of specific | Allocated in regulatory category of general |
| 1 | VIC | 39,711.9 | 476.5 | 37.7 | 143.9 |
| 2 | NSW | 23,200.7 | 189.2 | 8.5 | 48.2 |
| 3 | QLD | 15,276.3 | 127.9 | 5.3 | 37.0 |
| 4 | WA | 10,152.5 | 164.6 | 12.9 | 22.3 |
| 5 | SA | 8,787.9 | 175.8 | 5.9 | 25.7 |
| 6 | ACT | 4,704.1 | 11.9 | 0.2 | 3.0 |
| 7 | TAS | 1,824.0 | 32.3 | 4.0 | 4.3 |
| 8 | NT | 596.0 | 18.8 | 1.0 | 1.8 |
| 9 | OTH [2] | 185.0 | 5.3 | 0.3 | 0.2 |
| 10 | **Total** | **104,438.4** | **1,202.3** | **75.8** | **286.4** |

1. The geographical breakdown is largely based on the domicile of the responsible counterparties.
2. Includes overseas exposures.

The geographical breakdown is largely based on the domicile of the responsible counterparties.

# DIS40 – CRC Qualitative information related to credit risk mitigation techniques

Bendigo Bank

We employ a variety of CRM techniques to manage risk in our credit portfolio.

Credit risk mitigation commences with an objective assessment of the counterparty's character, industry, business model and capacity to meet financial commitments without distress. We also apply other credit risk mitigants such as a prudent approach to facility structure, collateral lending covenants and terms and conditions.

Specific transaction-based CRM techniques include:

- collateral
- margining
- netting.

Credit risk mitigation has a significant impact on capital requirements under APS 112 via two main mechanisms. Property-secured lending receives differential risk weights based on the loan-to-value (**LVR**) ratio of the loan, together with other inputs. Exposures secured by cash or other eligible financial collateral may reduce the exposure amounts on which capital is held. In all cases we only reflect the effect of CRM on capital requirements when all the legal, operational and data requirements to do so have been met.

## Collateral Evaluation and Management

Collateral is taken as a secondary source of repayment in the event that a counterparty is unable to fulfil contractual repayment commitments. In most instances, we take registrable security charges over collateral, and the security is registered. All collateral is recorded in appropriate systems.

Collateral most commonly obtained includes:

- residential, commercial and rural property
- business assets
- personal property
- cash deposits
- listed shares and securities.

In addition to realisable security, we may seek guarantee support from financially sound parties for finance advanced to a borrower counterparty. We also accept irrevocable guarantees or standby letters of credit issued by sovereign entities, domestic banks (**ADIs**) and overseas banks. Where allowed by policy, such guarantees or standby letters of credit may be recognised for risk rating purposes.

To ensure that collateral held is sufficiently liquid, enforceable and regularly valued, we have in place policy and procedures to define:

- acceptable asset types for collateral
- maximum LVR for each asset type
- the acceptable valuation methods for each asset type
- the requirements for a valuation to be acceptable, including who may value an asset and the frequency of revaluations.

The value of all realisable collateral is assessed prior to acceptance and is revalued where appropriate, be it on an asset-specific basis or a market assessment across a pool of assets, such as residential mortgages. The interval between revaluation is based on the type of asset, dollar value of the asset being valued, LVR, the market conditions that have prevailed since the valuation was conducted and counterparty performance. All prior claims on the collateral are recorded and taken into consideration when calculating the available security value.

## Portfolio Management

The Board approves the Risk Appetite Statement (**RAS**) that includes several metrics to mitigate the risk of concentration within the Group's total lending portfolios. These are designed to ensure that the Group's business origination strategies maintain an appropriately diversified loan portfolio.

The RAS outlines the amount of risk the Group is willing to accept across a range of metrics to ensure a spread of risk across the portfolio. This includes appetite limits for geographic exposure, industry exposure, large exposures and exposures considered higher risk. Portfolio monitoring against these metrics is reported regularly to MCC and proactively managed where appropriate. Large exposures are subject to additional controls including review and approval by committee with exposures regularly monitored.

Market-valued exposures (derivatives and securities financing transactions (**SFTs**)) have specific policies and practices applicable.

## Policy Framework

Our approach to derivative margining, collateral and netting is guided by the Derivatives Standard. This Standard outlines the processes and roles and responsibilities for management of credit risk as it relates to the Group's derivatives.

## Collateral Management

First Line Business teams are responsible for management of the Group's collateral position, with only cash collateral exchanged for margining purposes. The Group's exposures are monitored on an ongoing basis, to ensure that appropriate levels of collateral are available at all times.

First Line Business teams, in conjunction with Group Legal, determine that a counterparty is a covered entity and has met the qualifying thresholds for margining to apply, then Business Owners and Group Legal must ensure the International Swaps and Derivatives Association documentation with that counterparty includes a Credit Support Annex (**CSA**) that is compliant with CPS 226.

A daily reconciliation of the portfolio of non-centrally cleared over-the-counter (**OTC**) derivative transactions is undertaken for each counterparty with whom the Group has a CSA. Reconciliations with counterparties must ensure that the Group and the counterparty each has an accurate record of material terms and valuations of transactions.

## Netting

Close-out netting is the process of combining all outstanding transactions and reducing them to a single net payment in the event of default by a counterparty to a netting agreement. First Line Business teams are responsible for obtaining legal opinions on any netting agreement addressing the enforceability of the close-out netting agreement.

# DIS40 – CR3 Credit risk mitigation techniques – overview

**Amounts are in millions to 1 decimal place**

Bendigo Bank

Table CR3 presents a detailed breakdown of the Group's unsecured and secured loan and debt securities exposures (for both on- and off-balance sheet). The reported exposures consists of off-balance sheet exposures that are subject to the credit risk framework broken down between performing and non performing exposures.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | a [1] | b [2] | c | d [3] |
| | | Exposures unsecured: carrying amount | Exposures to be secured | Exposures secured by collateral | Exposures secured by financial guarantees |
| 1 | Loans | 1,014.7 | 82,401.9 | 82,391.9 | 10.0 |
| 2 | Debt securities | 9,066.8 | — | — | — |
| **3** | **Total [4]** | **10,081.5** | **82,401.9** | **82,391.9** | **10.0** |
| 4 | Of which non-performing | 40.5 | 1,071.4 | 1,071.3 | 0.1 |

| | | 31 Dec 24 | | | |
|---|---|---|---|---|---|
| | | a [1] | b [2] | c | d [3] |
| | | Exposures unsecured: carrying amount | Exposures to be secured | Exposures secured by collateral | Exposures secured by financial guarantees |
| 1 | Loans | 992.8 | 80,593.6 | 80,576.7 | 16.9 |
| 2 | Debt securities | 9,684.0 | — | — | — |
| **3** | **Total [4]** | **10,676.8** | **80,593.6** | **80,576.7** | **16.9** |
| 4 | Of which non-performing | 14.9 | 818.0 | 817.9 | 0.1 |

1. Unsecured exposures assumes there is either no collateral items linked to an exposure or the exposure is a Margin Lending exposure risk weighted at 100%.
2. Exposures secured by eligible collateral for the purpose of reducing capital requirements under APS 112.
3. The only financial guarantees recognised for risk-weighting purposes are SME loans guaranteed by the Commonwealth Government under the Coronavirus SME Guarantee Scheme.
4. Total carrying amounts are net of allowances / impairments.

# DIS40 – CRD
# Qualitative disclosure on Bank's use of external credit ratings under the standardised approach for credit risk

Bendigo Bank

We source credit rating information from a variety of sources, including:

- wholesale counterparties from S&P, Moody's and Fitch where applicable
- external ratings where available. This allows for risk-weighting exposures in the Sovereign, Bank, Public Sector Entity and Corporate asset classes.

Our approach to assigning internal credit ratings complies with APS 112 Capital Adequacy – Standardised Approach to Credit Risk Requirements as it relates to multiple External Credit Assessment Institution (**ECAI**) ratings. To adhere to these requirements, we ensure that:

- Ratings are sourced, where available, from S&P, Moody's and Fitch.
- Where there are two ECAI ratings available, the lowest rating is applied.
- Where there are three ECAI ratings available the lower of the two highest credit ratings is applied.

# DIS40 – CR4 Standardised approach – credit risk exposure and credit risk mitigation (CRM) effects

### Amounts are in millions to 1 decimal place

Table CR4 presents on-balance sheet and off-balance sheet exposures before and after CCF and CRM as well as associated RWA and RWA density by asset classes.

| | | 30 Jun 25 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f [1] |
| | | Exposures before CCF and CRM | | Exposures post-CCF and post-CRM | | RWA and RWA density | |
| **Asset classes** | | **On-balance sheet amount** | **Off-balance sheet amount** | **On-balance sheet amount** | **Off-balance sheet amount** | **RWA** | **RWA density** |
| 1 | Sovereigns and their central banks | 9,065.0 | 11.1 | 9,065.0 | 5.8 | 9.1 | 0.10% |
| 2 | Non-central government public sector entities | 75.7 | 78.0 | 75.7 | 30.3 | 53.0 | 50.00% |
| 4 | Banks | 4,111.3 | 25.0 | 703.5 | 10.0 | 173.6 | 24.33% |
| 5 | Covered bonds | 10.3 | — | 10.3 | — | 1.0 | 10.00% |
| 6 | Corporates | 1,005.5 | 782.8 | 996.1 | 306.3 | 1,061.6 | 81.51% |
| 7 | Subordinated debt, equity and other capital | 0.5 | — | 0.5 | — | 0.8 | 150.00% |
| 8 | Retail [2] | 2,160.6 | 2,803.2 | 2,156.7 | 1,119.9 | 1,213.3 | 37.03% |
| 9 | Real estate | 76,398.6 | 7,875.9 | 76,381.6 | 4,270.0 | 30,766.2 | 38.15% |
| | Of which: Residential property – OO&PI | 46,636.3 | 2,810.5 | 46,634.0 | 1,368.9 | 13,945.9 | 29.05% |
| | Of which: Residential property – other – standard | 18,118.1 | 2,721.3 | 18,111.2 | 1,189.2 | 7,151.8 | 37.06% |
| | Of which: Residential property – non-standard | 724.6 | 128.0 | 723.1 | 54.8 | 777.6 | 99.95% |
| | Of which: Commercial property – dependent | 1,807.2 | 191.0 | 1,804.1 | 78.0 | 1,450.9 | 77.09% |
| | Of which: Commercial property – not dependent | 8,712.2 | 1,904.6 | 8,709.0 | 1,462.5 | 6,664.8 | 65.52% |
| | Of which: Land acquisition, development and construction (**ADC**) | 400.2 | 120.5 | 400.2 | 116.6 | 775.2 | 150.00% |
| 10 | Non-performing exposures | 1,126.9 | 16.8 | 1,126.7 | 7.4 | 1,372.1 | 120.99% |
| 11 | Other assets [3] | 1,319.9 | — | 1,319.9 | — | 1,002.8 | 75.97% |
| 12 | **Total** | **95,274.3** | **11,592.8** | **91,836.0** | **5,749.7** | **35,653.5** | **36.54%** |

1. RWA density is calculated based on unrounded values.
2. Retail includes retail other, margin lending and leases.
3. Other assets include cash items in the process of collection, cash owned and held at the ADI or in transit, investments in premises, plant and equipment, and all other fixed assets and all other exposures not specified elsewhere.

# DIS40 – CR4 Standardised approach – credit risk exposure and CRM effects (continued)

**Amounts are in millions to 1 decimal place**

| | | 31 Dec 24 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f[3] |
| | | Exposures before CCF and CRM | | Exposures post-CCF and post-CRM | | RWA and RWA density | |
| | **Asset classes** | On-balance sheet amount | Off-balance sheet amount | On-balance sheet amount | Off-balance sheet amount | RWA | RWA density |
| 1 | Sovereigns and their central banks | 10,234.6 | 10.9 | 10,234.5 | 5.8 | 9.2 | 0.09% |
| 2 | Non-central government public sector entities | 75.8 | 78.0 | 75.8 | 30.3 | 53.0 | 50.00% |
| 4 | Banks | 3,801.7 | 25.0 | 841.6 | 10.0 | 203.3 | 23.88% |
| 5 | Covered bonds | 10.3 | — | 10.3 | — | 1.0 | 10.00% |
| 6 | Corporates | 1,048.6 | 1,247.8 | 1,035.9 | 524.0 | 1,271.7 | 81.52% |
| 7 | Subordinated debt, equity and other capital | 0.5 | — | 0.5 | — | 0.8 | 150.00% |
| 8 | Retail[1] | 2,220.6 | 2,743.1 | 2,214.4 | 1,096.4 | 1,207.3 | 36.46% |
| 9 | Real estate | 74,865.1 | 8,280.9 | 74,848.3 | 4,387.5 | 30,461.5 | 38.44% |
| | Of which: Residential property – OO&PI – standard | 45,802.1 | 2,907.3 | 45,797.1 | 1,475.2 | 13,918.3 | 29.44% |
| | Of which: Residential property – other – standard | 17,767.5 | 2,905.4 | 17,761.7 | 1,301.0 | 7,134.0 | 37.42% |
| | Of which: Residential property – non-standard | 690.4 | 135.5 | 689.7 | 58.3 | 747.6 | 99.95% |
| | Of which: Commercial property – dependent | 1,795.6 | 177.0 | 1,791.8 | 72.6 | 1,457.7 | 78.18% |
| | Of which: Commercial property – not dependent | 8,352.5 | 1,996.5 | 8,351.0 | 1,325.4 | 6,285.9 | 64.96% |
| | Of which: ADC | 457.0 | 159.2 | 457.0 | 155.0 | 918.0 | 150.00% |
| 10 | Non-performing exposures | 852.5 | 18.0 | 852.4 | 9.5 | 1,033.7 | 119.93% |
| 11 | Other assets[2] | 1,437.6 | — | 1,437.6 | — | 1,007.4 | 70.07% |
| 12 | **Total** | **94,547.3** | **12,403.7** | **91,551.3** | **6,063.5** | **35,248.9** | **36.11%** |

1. Retail includes retail other, margin lending and leases.
2. Other assets includes cash items in the process of collection, cash owned and held at the ADI or in transit, investments in premises, plant and equipment, and all other fixed assets and all other exposures not specified elsewhere.
3. RWA density is calculated based on unrounded values.

# Standardised approach – exposures by asset classes and risk weights

Amounts are in millions to 1 decimal place

Bendigo Bank

Table CR5 shows exposure at default post-CCF and CRM, broken down by Credit Exposure Class and risk weight. The table includes the weighted average CCF based on the off balance sheet exposures with pre- and post-EADs per risk weight category.

| | | 30 Jun 25 | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 0% | 10% | 20% | 25% | 30% | 35% | 40% | 45% | 50% | 55% | 60% | 65% | 70% | 75% | 80% | 85% | 90% | 95% | 100% | 105% | 110% | 120% | 150% | Total credit exposure amount (post-CCF and post-CRM) |
| 1 | Sovereigns and their central banks | 9,061.7 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 9.1 | — | — | — | — | 9,070.8 |
| 2 | Non—central government public sector entities | — | — | — | — | — | — | — | — | 106.0 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 106.0 |
| 4 | Banks | — | — | 424.8 | — | 278.7 | — | — | — | 10.0 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 713.5 |
| 5 | Covered bonds | — | 10.3 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 10.3 |
| 6 | Corporates | — | — | — | — | — | — | — | — | — | — | — | — | — | 712.2 | — | 418.1 | — | — | 172.1 | — | — | — | — | 1,302.4 |
| 7 | Subordinated debt equity and other capital | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.5 | 0.5 |
| 8 | Retail | — | — | 2,413.5 | — | — | — | — | — | — | — | — | — | — | 530.6 | — | — | — | — | 332.5 | — | — | — | — | 3,276.6 |
| 9 | Real estate | — | — | 11,961.5 | 13,443.1 | 14,550.7 | 14,058.8 | 5,843.5 | 5,033.2 | 1,016.6 | 295.2 | 7,990.3 | 798.3 | 1,589.4 | — | — | 2,175.8 | 268.9 | — | 887.8 | 112.6 | 18.8 | — | 607.1 | 80,651.6 |
| | Of which: Residential property – OO&PI – standard | — | — | 11,961.5 | 8,051.8 | 10,989.8 | 14,057.2 | 1,959.7 | — | 566.3 | 295.2 | — | — | 59.0 | — | — | 62.4 | — | — | — | — | — | — | — | 48,002.9 |
| | Of which: Residential property – other – standard | — | — | — | 5,391.3 | 3,560.9 | 1.6 | 3,883.8 | 5,033.2 | 449.6 | — | — | 798.3 | 26.3 | — | — | 42.8 | — | — | — | 112.6 | — | — | — | 19,300.4 |
| | Of which: Residential property – non-standard | — | — | — | — | — | — | — | — | 0.7 | — | — | — | — | — | — | — | — | — | 777.2 | — | — | — | — | 777.9 |
| | Of which: Commercial property – dependent | — | — | — | — | — | — | — | — | — | — | — | — | 1,504.1 | — | — | — | 268.9 | — | — | — | 18.8 | — | 90.3 | 1,882.1 |
| | Of which: Commercial property – not dependent | — | — | — | — | — | — | — | — | — | — | 7,990.3 | — | — | — | — | 2,070.6 | — | — | 110.6 | — | — | — | — | 10,171.5 |
| | Of which: ADC | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 516.8 | 516.8 |
| 10 | Non-performing exposures | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 72.0 | — | — | 16.9 | 413.8 | — | — | 208.2 | 423.2 | 1,134.1 |
| 11 | Other assets | 127.9 | — | 236.6 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 955.4 | — | — | — | — | 1,319.9 |

Table continued overleaf

# DIS40 – CR5 Standardised approach – exposures by asset classes and risk weights (continued)

Amounts are in millions to 1 decimal place

Exposure amounts and CCFs applied to off-balance sheet exposures, categorised based on risk bucket of converted exposures.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | a | b | c | d |
| Risk weight | | On-balance sheet exposure | Off-balance sheet exposure (pre-CCF) | Weighted average CCF [1] | Exposure (post-CCF and post-CRM) |
| 1 | Less than 40% | 67,060.7 | 6,604.2 | 0.44 | 66,567.6 |
| 2 | 40–70% | 20,788.9 | 2,903.8 | 0.66 | 22,682.5 |
| 3 | 75% | 885.9 | 942.7 | 0.39 | 1,242.8 |
| 4 | 80-85% | 2,466.7 | 429.3 | 0.47 | 2,665.9 |
| 5 | 90–100% | 2,832.9 | 560.3 | 0.41 | 3,056.5 |
| 6 | 105–130% | 331.9 | 15.2 | 0.61 | 339.6 |
| 7 | 150% | 907.3 | 137.3 | 0.90 | 1,030.8 |
| 11 | **Total exposures** | **95,274.3** | **11,592.8** | **0.50** | **97,585.7** |

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

# DIS40 – CR5
## Standardised approach – exposures by asset classes and risk weights
Amounts are in millions to 1 decimal place

Bendigo Bank

| | | 31 Dec 24 | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 0% | 10% | 20% | 25% | 30% | 35% | 40% | 45% | 50% | 55% | 60% | 65% | 70% | 75% | 80% | 85% | 90% | 95% | 100% | 105% | 110% | 120% | 150% | Total credit exposure amount (post-CCF and post-CRM) |
| 1 | Sovereigns and their central banks | 10,231.1 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 9.2 | — | — | — | — | 10,240.3 |
| 2 | Non-central government public sector entities | — | — | — | — | — | — | — | — | 106.1 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 106.1 |
| 4 | Banks | — | — | 541.3 | — | 300.3 | — | — | — | 10.0 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 851.6 |
| 5 | Covered bonds | — | 10.3 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 10.3 |
| 6 | Corporates | — | — | — | — | — | — | — | — | — | — | — | — | — | 894.3 | — | 431.2 | — | — | 234.4 | — | — | — | — | 1,559.9 |
| 7 | Subordinated debt equity and other capital | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.5 | 0.5 |
| 8 | Retail | — | — | 2,467.9 | — | — | — | — | — | — | — | — | — | — | 517.1 | — | — | — | — | 325.8 | — | — | — | — | 3,310.8 |
| 9 | Real estate | — | — | 11,050.5 | 12,661.3 | 14,152.3 | 14,580.8 | 6,082.3 | 5,163.3 | 1,198.7 | 273.3 | 7,827.6 | 892.4 | 1,500.8 | — | — | 1,840.8 | 336.4 | — | 866.4 | 82.1 | 16.2 | — | 710.6 | 79,235.8 |
| | Of which: Residential property – OO&PI – standard | — | — | 11,050.5 | 7,607.9 | 10,685.8 | 14,580.3 | 2,237.1 | — | 715.7 | 273.3 | — | — | 61.5 | — | — | 60.2 | — | — | — | — | — | — | — | 47,272.3 |
| | Of which: Residential property – other – standard | — | — | — | 5,053.4 | 3,466.5 | 0.5 | 3,845.2 | 5,163.3 | 482.2 | — | — | 892.4 | 26.1 | — | — | 51.0 | — | — | — | 82.1 | — | — | — | 19,062.7 |
| | Of which: Residential property – non-standard | — | — | — | — | — | — | — | — | 0.8 | — | — | — | — | — | — | — | — | — | 747.2 | — | — | — | — | 748.0 |
| | Of which: Commercial property – dependent | — | — | — | — | — | — | — | — | — | — | — | — | 1,413.2 | — | — | — | 336.4 | — | — | — | 16.2 | — | 98.6 | 1,864.4 |
| | Of which: Commercial property – not dependent | — | — | — | — | — | — | — | — | — | — | 7,827.6 | — | — | — | — | 1,729.6 | — | — | 119.2 | — | — | — | — | 9,676.4 |
| | Of which: ADC | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 612.0 | 612.0 |
| 10 | Non-performing exposures | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 63.2 | — | — | 13.1 | 315.7 | — | — | 166.2 | 303.7 | 861.9 |
| 11 | Other assets | 159.9 | — | 337.9 | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 939.8 | — | — | — | — | 1,437.6 |

# DIS40 – CR5 Standardised approach – exposures by asset classes and risk weights (continued)

**Amounts are in millions to 1 decimal place**

Bendigo Bank

**Exposure amounts and CCFs applied to off-balance sheet exposures, categorised based on risk bucket of converted exposures.**

| | | 31 Dec 24 | | | |
|---|---|---|---|---|---|
| | | a | b | c | d |
| | **Risk weight** | **On-balance sheet exposure** | **Off-balance sheet exposure (pre-CCF)** | **Weighted average CCF [1]** | **Exposure (post-CCF and post-CRM)** |
| 1 | Less than 40% | 66,412.5 | 6,737.6 | 0.45 | 66,493.6 |
| 2 | 40–70% | 21,175.3 | 3,165.4 | 0.60 | 23,054.5 |
| 3 | 75% | 948.3 | 1,216.9 | 0.39 | 1,411.4 |
| 4 | 80-85% | 2,126.0 | 505.9 | 0.42 | 2,335.2 |
| 5 | 90–100% | 2,770.5 | 593.2 | 0.47 | 3,040.8 |
| 6 | 105–130% | 263.1 | 9.8 | 0.46 | 264.5 |
| 7 | 150% | 851.6 | 174.9 | 0.93 | 1,014.8 |
| 11 | **Total exposures** | **94,547.3** | **12,403.7** | **0.49** | **97,614.8** |

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

# DIS42 – CCRA
# Qualitative disclosure related to counterparty credit risk

Bendigo Bank

## The Group is also exposed to counterparty credit risk, which is the risk that a counterparty may default before the final settlement of the transaction's cash flows.

This risk is primarily related to the Group's derivative exposures, and is mitigated using margining and central clearing. Limits constraining counterparty credit risk are informed by ECAI ratings, in line with the Treasury and Financial Markets Credit Standard.

MCC provides oversight of counterparty credit risk management. Reporting is produced monthly by Line 2.

Regarding standby facilities under the Group Covered Bond program: in the event of a one-notch downgrade by Fitch, the Group would incur additional outflows. This is based on current outstandings if the Group does not novate or arrange a new facility.

# DIS42 – CCR1 Analysis of CCR exposures by approach

## Amounts are in millions to 1 decimal place

Table CCR1 provides a comprehensive view of the methods used to calculate counterparty credit risk exposures, including the simplified method that the Bank has adopted.

| | | 30 Jun 25 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | Replacement cost | Potential future exposure | Effective EPE | Alpha used for computing regulatory EAD | EAD post-CRM | RWA |
| 1 | SA-CCR (for derivatives) | 103.9 | 60.9 | | 1.4 | 166.9 | 83.2 |
| 3 | Simple Approach for credit risk mitigation (for SFTs) | | | | | — | — |
| 6 | **Total** | | | | | | **83.2** |

| | | 31 Dec 24 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | Replacement cost | Potential future exposure | Effective EPE | Alpha used for computing regulatory EAD | EAD post-CRM | RWA |
| 1 | SA-CCR (for derivatives) | 68.9 | 55.5 | | 1.4 | 126.7 | 57.8 |
| 3 | Simple Approach for credit risk mitigation (for SFTs) | | | | | — | — |
| 6 | **Total** | | | | | | **57.8** |

# DIS42 – CCR3
# Standardised approach – CCR exposures by regulatory portfolio and risk weights

Amounts are in millions to 1 decimal place

Table CCR3 presents a breakdown of counterparty credit risk exposures by regulatory portfolio and risk weight.

| | | | 30 Jun 25 | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | a | b | c | d | e | f | g | h | i |
| | Risk weight → | | 0% | 10% | 20% | 50% | 75% | 100% | 150% | Others | Total credit exposure |
| 1 | Regulatory portfolio | Sovereigns and their central banks | — | — | — | — | — | — | — | — | — |
| 2 | | Banks | — | — | 9.9 | 151.5 | — | — | — | — | 161.4 |
| 3 | | Corporates | — | — | — | — | — | 5.5 | — | — | 5.5 |
| 4 | | Retail | — | — | — | — | — | — | — | — | — |
| 5 | | Others Assets | — | — | — | — | — | — | — | — | — |
| 6 | **Total** | | **—** | **—** | **9.9** | **151.5** | **—** | **5.5** | **—** | **—** | **166.9** |

| | | | 31 Dec 24 | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | a | b | c | d | e | f | g | h | i |
| | Risk weight → | | 0% | 10% | 20% | 50% | 75% | 100% | 150% | Others | Total credit exposure |
| 1 | Regulatory portfolio | Sovereigns and their central banks | — | — | — | — | — | — | — | — | — |
| 2 | | Banks | — | — | 25.6 | 96.9 | — | — | — | — | 122.5 |
| 3 | | Corporates | — | — | — | — | — | 4.2 | — | — | 4.2 |
| 4 | | Retail | — | — | — | — | — | — | — | — | — |
| 5 | | Others Assets | — | — | — | — | — | — | — | — | — |
| 6 | **Total** | | **—** | **—** | **25.6** | **96.9** | **—** | **4.2** | **—** | **—** | **126.7** |

# DIS42 – CCR5 Composition of collateral for CCR exposures

Amounts are in millions to 1 decimal place

Table CCR5 shows a breakdown of collateral posted or received to support or reduce the CCR exposures related to derivative transactions or securities financing transactions (**SFTs**), including the value of settlements posted or received under the Settled-to-Market model with central counterparties (**CCPs**).

| | | 30 Jun 25 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | Collateral used in derivative transactions | | | | Collateral used in SFTs | |
| | | Fair value of collateral received[1] | | Fair value of posted collateral[2] | | Fair value of collateral received[3] | Fair value of posted collateral |
| | | Segregated | Unsegregated | Segregated | Unsegregated | | |
| 1 | Cash – domestic currency | | 519.9 | | 149.6 | | |
| 2 | Cash – other currencies | | — | | 116.5 | | |
| 3 | Domestic sovereign debt | | | | | 3,420.1 | — |
| **9** | **Total** | | **519.9** | | **266.1** | **3,420.1** | **—** |

| | | 31 Dec 24 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | Collateral used in derivative transactions | | | | Collateral used in SFTs | |
| | | Fair value of collateral received[1] | | Fair value of posted collateral[2] | | Fair value of collateral received[3] | Fair value of posted collateral |
| | | Segregated | Unsegregated | Segregated | Unsegregated | | |
| 1 | Cash – domestic currency | | 431.7 | | 85.4 | | |
| 2 | Cash – other currencies | | — | | 109.7 | | |
| 3 | Domestic sovereign debt | | | | | 2,961.8 | — |
| **9** | **Total** | | **431.7** | | **195.1** | **2,961.8** | **—** |

1. Received collateral includes exposure for non-centrally cleared derivatives as well as any Variation Margin for central counterparties.
2. Posted collateral includes exposure for non-centrally cleared derivatives as well as any Variation Margin and Initial Margin for central counterparties.
3. Received collateral is reported as an absolute amount for reverse repurchase agreements.

Table CCR6 presents credit derivatives bought or sold by notional and fair values.

| | | 30 Jun 25 | | 31 Dec 24 | |
|---|---|---|---|---|---|
| | | a | b | a | b |
| | | Protection bought | Protection sold | Protection bought | Protection sold |
| **Notionals** | | | | | |
| 1 | Single-name credit default swaps | — | — | — | — |
| 2 | Index credit default swaps | — | — | — | — |
| 3 | Total return swaps | — | — | — | — |
| 4 | Credit options | — | — | — | — |
| 5 | Other credit derivatives | — | — | — | — |
| **6** | **Total notionals** | — | — | — | — |
| **Fair values** | | | | | |
| 7 | Positive fair value (asset) | — | — | — | — |
| 8 | Negative fair value (liability) | — | — | — | — |

# DIS42 – CCR8
# Exposures to central counterparties
## Amounts are in millions to 1 decimal place

Bendigo Bank

Table CCR8 presents a comprehensive view of exposures and RWAs to CCPs.

| | | 30 Jun 25 | | 31 Dec 24 | |
|---|---|---|---|---|---|
| | | a | b | a | b |
| | | EAD (post-CRM) | RWA | EAD (post-CRM) | RWA |
| 1 | **Exposures to Qualifying Central Counterparty (QCCPs) (total)** | | **4.4** | | **4.4** |
| 2 | Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which: | 101.8 | 2.1 | 112.9 | 2.2 |
| 3 | i) OTC derivatives | 101.8 | 2.1 | 112.9 | 2.2 |
| 4 | ii) Exchange-traded derivatives | — | — | — | — |
| 5 | iii) Securities financing transactions | — | — | — | — |
| 7 | Segregated initial margin | — | | — | |
| 8 | Non-segregated initial margin | 116.5 | 2.3 | 109.7 | 2.2 |
| 11 | **Exposures to non-Qualifying Central Counterparty (non-QCCPs) (total)** | | — | | — |
| 12 | Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which: | — | — | — | — |
| 13 | i) OTC derivatives | — | — | — | — |
| 14 | ii) Exchange-traded derivatives | — | — | — | — |
| 15 | iii) Securities financing transactions | — | — | — | — |
| 17 | Segregated initial margin | — | | — | |
| 18 | Non-segregated initial margin | — | — | — | — |

# DIS43 – SECA
# Qualitative disclosure requirements related to securitisation exposures

Under APS 120, Securitisation is a financing structure where the cash flow from a pool is used to make payments on obligations to at least two tranches or classes of creditors (typically holders of debt securities), with each tranche or class entitled to receive payments from the pool before or after another class of creditors, thereby reflecting different levels of credit risk.

We must describe our risk management objectives and policies for securitisation activities. This information should align with the framework below. We may also hold securitisation positions in both the regulatory banking book and the regulatory trading book.

## a) Bendigo Bank Securitisation Programs

### TORRENS Trusts

The Group uses Special Purpose Entities (**SPEs**) to securitise customer loans and advances that it has originated. We do this in order to source funding and/or for capital efficiency purposes. The Group invests in some of its own securitisations, including for the purposes of maintaining access to liquidity from the RBA via repurchase agreements.

### Portfolio Funding

The Group includes a specialist business (Portfolio Funding) which is part of the Business and Agribusiness Division. They specialise in the financing of third-party originated debt portfolios across a variety of asset classes, using securitisation techniques to mitigate the risks inherent in the assets and generate enhanced yields. Portfolio Funding takes an investor role in transactions (i.e. not originating ADI as defined under APS 120). Portfolio Funding does not sell or originate the underlying receivables into the SPE. Rather, this activity is conducted by third-party originators. The Group provides certain facilities and subscribes to the senior securities issued by the SPE.

## b) Special purpose entities, affiliated entities and implicit support

- **Special purpose entities**
  The Group does not have any SPEs where it acts as sponsor but not as originator.
- **Affiliated entities**
  The Group does not have any affiliated entities investing in any securitisation trusts.
- **Implicit support**
  The Group does not provide implicit support.

## c) Accounting policies for securitisation activities

### Per the Group's Financial Statements:

Securities sold under agreement to repurchase are retained on Balance Sheet when the majority of the risks and rewards of ownership remain with the Group. The counterparty liability is included separately in the Balance Sheet when cash consideration is received.

### Securitisation Programs

Securitised loans are transferred by the Group to the SPEs, which in turn issue debt to investors. This transfer does not give rise to the de-recognition of those financial assets for the Group. The Group holds income and capital units in the SPEs which entitles the Group to any residual income after all payments to investors and costs have been met. Trust investors have no recourse against us if cash flows from the securitised loans are inadequate to service the trust obligations. Liabilities associated with the SPEs are accounted for at amortised cost using the effective interest rate method.

## d) ECAIs used for securitisations

The names of ECAIs used for securitisations and the types of securitisation exposure for which each agency is used.

### TORRENS Trust Notes and Portfolio Funding Rated Notes

| # | Rating Agency | Types of Securitisation Exposure |
|---|---|---|
| 1 | S&P Global Ratings Australia Pty Ltd | RMBS Trusts |
| 2 | Fitch Australia Pty Ltd | RMBS Trusts and Asset Backed Securities |
| 3 | Moody's Investors Service Pty Ltd | RMBS Trusts, Asset Backed Securities and Capital Markets Trusts |

# DIS43 – SEC1
# Securitisation exposures in the banking book
### Amounts are in millions to 1 decimal place

Table SEC1 sets out the Group's securitisation exposures in the banking book.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | a | d | i | l |
| | | Bank acts as originator[1] | | Banks acts as investor[2] | |
| | | Traditional | Sub-total | Traditional | Sub-total |
| 1 | Retail (total) – of which: | 8,186.3 | 8,186.3 | 3,089.3 | 3,089.3 |
| 2 | Residential mortgage | 8,186.3 | 8,186.3 | 2,854.5 | 2,854.5 |
| 4 | Other retail exposures | — | — | 234.8 | 234.8 |
| 6 | Wholesale (total) – of which: | | | 236.9 | 236.9 |
| 7 | Liquidity and other funding facilities | | | 0.3 | 0.3 |
| 8 | Commercial mortgage | | | 21.9 | 21.9 |
| 9 | Lease and receivables | | | 80.1 | 80.1 |
| 12 | Other wholesale | | | 134.6 | 134.6 |

| | | 31 Dec 24 | | | |
|---|---|---|---|---|---|
| | | a | d | i | l |
| | | Bank acts as originator[1] | | Banks acts as investor[2] | |
| | | Traditional | Sub-total | Traditional | Sub-total |
| 1 | Retail (total) – of which: | 8,560.6 | 8,560.6 | 2,979.4 | 2,979.4 |
| 2 | Residential mortgage | 8,560.6 | 8,560.6 | 2,760.1 | 2,760.1 |
| 4 | Other retail exposures | — | — | 219.3 | 219.3 |
| 6 | Wholesale (total) – of which: | | | 256.9 | 256.9 |
| 7 | Liquidity and other funding facilities | | | 1.5 | 1.5 |
| 8 | Commercial mortgage | | | 25.8 | 25.8 |
| 9 | Lease and receivables | | | 73.9 | 73.9 |
| 12 | Other wholesale | | | 155.7 | 155.7 |

1. Bank acts as an Originator reflects securitisation activities where we securitise our own assets.
2. Bank acts as an Investor reflects purchases of securitisation assets purchased from the market.

# DIS43 – SEC2
# Securitisation exposures in the trading book

## Amounts are in millions to 1 decimal place

Table SEC2 sets out the Group's securitisation exposures in the trading book.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | a | d | i | l |
| | | Bank acts as originator | | Banks acts as investor | |
| | | Traditional | Sub-total | Traditional | Sub-total |
| 1 | Retail (total) – of which: | — | — | — | — |
| 2 | Residential mortgage | — | — | — | — |

| | | 31 Dec 24 | | | |
|---|---|---|---|---|---|
| | | a | d | i | l |
| | | Bank acts as originator | | Banks acts as investor | |
| | | Traditional | Sub-total | Traditional | Sub-total |
| 1 | Retail (total) – of which: | — | — | — | — |
| 2 | Residential mortgage | — | — | — | — |

# DIS43 – SEC3
# Securitisation exposures in the banking book and associated regulatory capital requirements – bank acting as originator or as sponsor

Amounts are in millions to 1 decimal place

Table SEC3 sets out the Group's securitisation exposures in the banking book when the bank acts as originator or sponsor and the associated capital requirements.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | a | g | k | o |
| | | Exposure values (by risk weight bands) | Exposure values (by regulatory approach) | RWA (by regulatory approach) | Capital charge after cap |
| | | ≤20% | SEC-ERBA and SEC-IAA | SEC-ERBA and SEC-IAA | SEC-ERBA and SEC-IAA |
| 1 | **Total exposures** | **48.9** | **48.9** | **9.8** | **0.7** |
| 2 | Traditional securitisation | 48.9 | 48.9 | 9.8 | 0.7 |
| 3 | Of which securitisation | 48.9 | 48.9 | 9.8 | 0.7 |
| 4 | Of which retail underlying | 48.9 | 48.9 | 9.8 | 0.7 |

| | | 31 Dec 24 | | | |
|---|---|---|---|---|---|
| | | a | g | k | o |
| | | Exposure values (by risk weight bands) | Exposure values (by regulatory approach) | RWA (by regulatory approach) | Capital charge after cap |
| | | ≤20% | SEC-ERBA and SEC-IAA | SEC-ERBA and SEC-IAA | SEC-ERBA and SEC-IAA |
| 1 | **Total exposures** | **61.5** | **61.5** | **12.3** | **1.0** |
| 2 | Traditional securitisation | 61.5 | 61.5 | 12.3 | 1.0 |
| 3 | Of which securitisation | 61.5 | 61.5 | 12.3 | 1.0 |
| 4 | Of which retail underlying | 61.5 | 61.5 | 12.3 | 1.0 |

# DIS43 – SEC4
# Securitisation exposures in the banking book and associated capital requirements – bank acting as investor

**Amounts are in millions to 1 decimal place**

Table SEC4 sets out the Group's securitisation exposures in the banking book when the bank acts as investor and the associated capital requirements.

| | | 30 Jun 25 | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | g | h | k | l | o | p |
| | | Exposure values (by risk weight bands) | | | | Exposure values (by regulatory approach) | | RWA (by regulatory approach) | | Capital charge after cap | |
| | | ≤20% | >20% to 50% | >50% to 100% | >100% to <1250% RW | SEC-ERBA and SEC-IAA | SEC-SA | SEC-ERBA and SEC-IAA | SEC-SA | SEC-ERBA and SEC-IAA | SEC-SA |
| 1 | **Total exposures** | **3,041.7** | **284.6** | **—** | **—** | **434.5** | **2,891.9** | **86.9** | **489.1** | **7.0** | **39.1** |
| 2 | Traditional securitisation | 3,041.7 | 284.6 | — | — | 434.5 | 2,891.9 | 86.9 | 489.1 | 7.0 | 39.1 |
| 3 | Of which securitisation | 3,041.7 | 284.6 | — | — | 434.5 | 2,891.9 | 86.9 | 489.1 | 7.0 | 39.1 |
| 4 | Of which retail underlying | 2,807.2 | 282.1 | — | — | 417.6 | 2,671.8 | 83.5 | 455.8 | 6.7 | 36.4 |
| 6 | Of which wholesale | 234.5 | 2.5 | — | — | 16.9 | 220.1 | 3.4 | 33.3 | 0.3 | 2.7 |

| | | 31 Dec 24 | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | g | h | k | l | o | p |
| | | Exposure values (by risk weight bands) | | | | Exposure values (by regulatory approach) | | RWA (by regulatory approach) | | Capital charge after cap | |
| | | ≤20% | >20% to 50% | >50% to 100% | >100% to <1250% RW | SEC-ERBA and SEC-IAA | SEC-SA | SEC-ERBA and SEC-IAA | SEC-SA | SEC-ERBA and SEC-IAA | SEC-SA |
| 1 | **Total exposures** | **2,865.9** | **370.4** | **—** | **—** | **438.6** | **2,797.7** | **87.7** | **507.4** | **7.0** | **40.6** |
| 2 | Traditional securitisation | 2,865.9 | 370.4 | — | — | 438.6 | 2,797.7 | 87.7 | 507.4 | 7.0 | 40.6 |
| 3 | Of which securitisation | 2,865.9 | 370.4 | — | — | 438.6 | 2,797.7 | 87.7 | 507.4 | 7.0 | 40.6 |
| 4 | Of which retail underlying | 2,610.1 | 369.2 | — | — | 417.4 | 2,562.0 | 83.5 | 471.8 | 6.7 | 37.8 |
| 6 | Of which wholesale | 255.8 | 1.2 | — | — | 21.2 | 235.7 | 4.2 | 35.6 | 0.3 | 2.8 |

# DIS50 – MRA
# General qualitative disclosure requirements related to market risk

## Traded Market Risk is the risk of losses in the Group's Trading Book owing to changes in the general level of market prices, including interest rates and foreign exchange rates.

Failure to adequately manage Market Risk may result in financial losses, adversely impacting the Group's earnings and financial position.

Traded Market Risk is managed by Group Treasury and Financial Markets. Independent monitoring, review and challenge, and reporting of Traded Market Risk exposures is undertaken by Line 2.

BRC and ALMAC provide oversight of Traded Market Risks.

Traded Market Risk is managed in line with the Group's RAS, ALMAC Limit Schedule, and Group Trading Book Policy. The Group Trading Book Policy outlines the Group's approach to determining whether a position is designated as trading, and the requirement to monitor that positions are held no longer than 180 days.

Trading Book positions are measured, reported, and monitored against limit via the Quantum system.

Instruments available for hedging Traded Market Risk are formalised in the Treasury and Financial Markets Approved Product Policy.

# DIS50 – Table 1
# Market risk – disclosures for ADIs using the standard method

Amounts are in millions to 1 decimal place

Bendigo Bank

Table 1 reports on the capital requirements (in terms of risk-weighted assets) for:

- interest rate risk
- equity position risk
- foreign exchange risk
- commodity risk.

| | | | 30 Jun 25 | 31 Dec 24 | 30 Jun 24 | 30 Jun 25 | 31 Dec 24 | 30 Jun 24 |
|---|---|---|---|---|---|---|---|---|
| | | | Market risk – disclosures for ADIs using the standard method | | | | | |
| | | | Risk weighted assets [1] | | | Total capital required | | |
| 1 | Standard approach | Interest rate risk | — | — | — | — | — | — |
| 2 | | Foreign exchange risk | 0.7 | 0.9 | 0.5 | 0.1 | 0.1 | — |
| 3 | | Equity risk | — | — | — | — | — | — |
| 4 | | Commodity risk | — | — | — | — | — | — |
| 5 | | **Total** | **0.7** | **0.9** | **0.5** | **0.1** | **0.1** | **—** |

1. RWA equivalent is the capital requirement multiplied by 12.5 in accordance with APS 110.

# DIS51 – CVAA
# General qualitative disclosure requirements related to Credit Valuation Adjustment Risk

Bendigo Bank

## Capital requirement for CVA

CVA applies to over-the-counter derivative transactions. The objective of CVA is to account for counterparty credit risk, ensuring we have capital reserves to account for losses from counterparty defaults.

We determine our CVA risk capital requirement according to the simplified approach given the scale and nature of the derivative exposures. Bendigo Bank's CVA Capital Charge is equivalent to the total bi-lateral RWE amount (i.e. 100% of the bank's capital requirement for counterparty credit risk).

Counterparty credit risk is managed through a variety of policies, standards and procedures.

Line 1 is responsible for management of counterparty credit risk within limits, with oversight provided by Line 2 and MCC.

# DIS60 – ORA General qualitative information on a bank's Operational Risk Framework

Bendigo Bank

## Operational risk is defined as the risk of impact on objectives or risk of loss resulting from inadequate or failed internal processes or systems, the actions or inactions of people, or from external drivers and events. It covers a broad range of risks including, but not limited to, material risks such as regulatory and compliance, financial crime, conduct, service provider, data, technology, and information security risks.

Operational risk is managed in accordance with the Operational Risk Framework which outlines important activities to ensure we manage and minimise our risks with details outlined in more detail in DIS20-OVA: Bank risk management approach.

Not managing operational risks can result in significant adverse outcomes for our stakeholders. This includes customers, staff, shareholders, or community. Operational risk events due to ineffective processes or insufficient controls can impact our reputation and strategy. They can also attract significant financial losses, regulatory intervention, fines, and penalties. Finally, depending on the failure, they can also result in litigation or class action. All staff have a role in managing operational risk in our three-lines-of-defence approach.

The operational risk measurement system captures the fundamental operational risk management inputs. These are created in line with our Risk Management Framework. They provide the output/reporting for risk profiles, such as scenario analysis. Ultimately, they support the organisation to develop strategies to effectively manage operational risk.

The Operational Risk Reporting Framework includes 2LoD regular reporting to the Operational Risk Committee and Board Risk Committee. This is in accordance with the relevant charters. The reports include key changes to the operational risk profile in the period including any breach in RAS. This is in line with the Risk Appetite Methodology and RAS.

# DIS60 – OR1
# Historical losses

## Amounts are in millions to 1 decimal place

Bendigo Bank

Table OR1 presents the Group's actual historical operational risk losses[1] over the last 10 years with losses presented in each financial year.

| | | | | 2024 | 2023 | 2022 | 2021 | 2020 | 2019 | 2018 | 2017 | 2016 | 2015 | Ten-year average |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | a | b | c | d | e | f | g | h | i | j | k |
| **Threshold** | | **Metric** | | | | | | | | | | | | |
| 1 | $35,000 | Total amount of operational losses net of recoveries (no exclusions) | $ | 28.1 | 15.2 | 15.3 | 9.2 | 34.7 | 8.7 | 11.2 | 10.6 | 17.8 | 20.1 | 17.1 |
| 2 | $35,000 | Total number of operational risk losses | # | 51 | 169 | 94 | 72 | 56 | 32 | 30 | 28 | 47 | 40 | 62 |
| 3 | $35,000 | Total amount of excluded operational risk losses | $ | 0.1 | — | 0.1 | 2.6 | 4.4 | 5.7 | 3.6 | 3.9 | 15.4 | 13.9 | 5.0 |
| 4 | $35,000 | Total number of exclusions | # | 2 | — | 1 | 5 | 10 | 8 | 16 | 17 | 15 | 11 | 9 |
| 5 | $35,000 | Total amount of operational losses net of recoveries and net of excluded losses | $ | 28.0 | 15.2 | 15.2 | 6.6 | 30.3 | 3.1 | 7.6 | 6.7 | 2.5 | 6.2 | 12.1 |
| 6 | $150,000 | Total amount of operational losses net of recoveries (no exclusions) | $ | 25.5 | 5.6 | 10.5 | 5.7 | 32.1 | 7.3 | 9.4 | 9.3 | 15.2 | 18.6 | 13.9 |
| 7 | $150,000 | Total number of operational risk losses | # | 11 | 17 | 20 | 13 | 19 | 11 | 7 | 12 | 10 | 21 | 14 |
| 8 | $150,000 | Total amount of excluded operational risk losses | $ | — | — | — | 2.4 | 3.7 | 5.3 | 2.5 | 3.1 | 14.8 | 13.6 | 4.5 |
| 9 | $150,000 | Total number of exclusions | # | — | — | — | 3 | 4 | 4 | 4 | 7 | 8 | 7 | 4 |
| 10 | $150,000 | Total amount of operational losses net of recoveries and net of excluded losses | $ | 25.5 | 5.6 | 10.5 | 3.3 | 28.3 | 2.0 | 6.9 | 6.3 | 0.4 | 5.0 | 9.4 |
| **Details of operational risk capital calculation** | | | | | | | | | | | | | | |
| 11 | Are losses used to calculate the ILM (yes/no)? | | | No | | | | | | | | | | |
| 12 | If "no" in row 11, is the exclusion of internal loss data due to non-compliance with the minimum loss data standards (yes/no)? | | | No | | | | | | | | | | |
| 13 | Loss event threshold: $35,000 or $150,000 for the operational risk capital calculation if applicable | | | N/A | | | | | | | | | | |

1. The figures for operational risk losses have been sourced from Governance, Risk and Compliance system.

# DIS60 – OR2
# Business indicator and subcomponents

**Amounts are in millions to 1 decimal place**

Table OR2 provides the business indicator and its subcomponents which informed the operational risk capital as set out in OR3.

| | **BI and its subcomponents** | **30 Jun 24**<br>**a** | **30 Jun 23**<br>**b** | **30 Jun 22**<br>**c** |
|---|---|---|---|---|
| 1 | Interest, lease and dividend component [1] | 1,571.8 | | |
| 1a | Interest and lease income | 4,613.3 | 3,265.0 | 1,694.9 |
| 1b | Interest and lease expense | 3,011.0 | 1,675.5 | 323.4 |
| 1c | Interest earning assets [2] | 90,298.6 | 85,203.4 | 85,074.5 |
| 1d | Dividend income | 54.0 | 8.7 | 89.5 |
| 2 | Services component [3] | 268.5 | | |
| 2a | Fee and commission income | 152.6 | 137.3 | 154.0 |
| 2b | Fee and commission expense | 8.5 | 17.5 | 40.4 |
| 2c | Other operating income | 175.2 | 94.9 | 91.5 |
| 2d | Other operating expense | 136.5 | 107.8 | 67.0 |
| 3 | Financial component [4] | 3.0 | | |
| 3a | Net P&L on the trading book | 0.7 | 0.8 | 0.9 |
| 3b | Net P&L on the banking book | 4.9 | 1.4 | (0.2) |
| 4 | BI [5] | 1,843.3 | | |
| 5 | Business indicator component (**BIC**) [6] | 231.5 | | |

1. The interest, lease and dividend component is calculated as the lesser of the average of net interest and lease income and 2.25% of interest earning assets, plus the average of dividend income.
2. Interest earning assets as at the end of each financial year.
3. The services component is calculated as the higher of the average of fee and commission income and expense, plus the higher of the average of other operating income and expense.
4. The financial component is calculated as the sum of the average of net profit or loss on the trading and banking book.
5. The business indicator and its components, representing averages of the most recent three financial years, are presented in the column for the most recent financial year, consistent with the disclosure template prescribed by APS 330.
6. Calculated as the business indicator multiplied by 12%, plus 3% of the amount by which the business indicator exceeds $1.5 billion.

Between 2023 and 2024 the section 'Interest, lease and dividend component' increased as a result of the increase of Net Interest Income by $101 million.

Between 2023 and 2024 the section 'services component' decreased as a result of the maximum value decreasing by $59 million.

# DIS60 – OR3
# Minimum required operational risk capital
## Amounts are in millions to 1 decimal place

Table OR3 provides details of the operational risk regulatory capital requirements.

| | | 30 Jun 24 | 30 Jun 23 |
|---|---|---|---|
| | | a | b |
| 1 | Business indicator component (BIC) | 231.5 | 218.5 |
| 2 | Internal loss multiplier (**ILM**) [1] | 1.0 | 1.0 |
| 3 | Minimum required operational risk capital (**ORC**) [2] | 231.5 | 218.5 |
| | Other regulatory capital charges | — | — |
| 4 | Operational risk RWA [3] | 2,893.7 | 2,731.1 |

1. APS 115 does not include an internal loss multiplier, which is a scaling factor based on average historical losses, in the calculation of operational risk capital.
2. Calculated as the business indicator component, multiplied by the internal loss multiplier, plus other regulatory capital charges.
3. Operational risk RWA is operational risk capital multiplied by 12.5.

# DIS70 – IRRBBA
# Interest rate risk in the banking book (IRRBB) risk management objective and policies

## IRRBB arises from the Group's balance sheet funding and lending activities, and investments.

IRRBB is primarily managed by Group Treasury, in line with the Group IRRBB Policy and risk appetite limits formalised in the RAS and ALMAC Limit Schedule. Independent monitoring, review and challenge, and reporting of IRRBB is undertaken by Line 2. The Group's IRRBB models are independently validated periodically, to ensure they remain fit for purpose and compliant with regulatory requirements.

BRC and ALMAC provide oversight of IRRBB. Reporting of economic value sensitivity, value at risk, net interest income sensitivity and stress testing results is produced at least monthly, and provided to each ALMAC meeting. The IRRBB stress testing framework comprises a range of historical and theoretical interest rate shock and stress scenarios which are used to estimate changes in economic value and earnings.

Instruments available for hedging IRRBB are formalised in the Treasury and Financial Markets Approved Product Policy. IRRBB exposures are hedged on a portfolio basis, with hedge accounting applied by Group Finance.

IRRBB exposures are measured, reported, and monitored via the Focus system.

To calculate economic value, a base yield curve is constructed for projection and discounting of cash flows. Construction of this curve comprises wholesale market instruments available to be utilised in the management of interest rate risk exposures.

Non-maturity deposits with low-rate sensitivity are assigned a five-year repricing term. ALMAC is responsible for approval of this repricing assumption, giving consideration to the stability, expected life and rate sensitivity of underlying products.

Prepayment rates on fixed-rate loans and optionality associated with fixed-rate offsets are modelled using historical time series data, with adjustments made to allow for serial correlation in the observations.

# DIS70 – IRRBB1
## Quantitative information on IRRBB
Amounts are in millions to 1 decimal place

Bendigo Bank

Table IRRBB1 provides quantitative information on interest rate risk in the Banking Book.

| | 30 Jun 25 | | | | | | 31 Mar 25 | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Currency/ Date | 200bp parallel increase (excluding earnings offset) | 200bp parallel decrease (excluding earnings offset) | 200bp parallel increase (including earnings offset) | 200bp parallel decrease (including earnings offset) | Total capital required | RWA | 200bp parallel increase (excluding earnings offset) | 200bp parallel decrease (excluding earnings offset) | 200bp parallel increase (including earnings offset) | 200bp parallel decrease (including earnings offset) | Total capital required | RWA |
| AUD | (90.2) | 94.2 | (44.2) | 47.6 | * | * | (96.2) | 100.0 | (51.2) | 54.3 | * | * |
| OTH | 0.8 | (0.8) | 0.8 | (0.8) | * | * | 1.2 | (1.2) | 1.2 | (1.2) | * | * |

| | 31 Dec 24 | | | | | | 30 Sep 24 | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Currency/ Date | 200bp parallel increase (excluding earnings offset) | 200bp parallel decrease (excluding earnings offset) | 200bp parallel increase (including earnings offset) | 200bp parallel decrease (including earnings offset) | Total capital required | RWA | 200bp parallel increase (excluding earnings offset) | 200bp parallel decrease (excluding earnings offset) | 200bp parallel increase (including earnings offset) | 200bp parallel decrease (including earnings offset) | Total capital required | RWA |
| AUD | (41.5) | 44.8 | (8.2) | 11.0 | * | * | (53.9) | 57.7 | (22.5) | 25.8 | * | * |
| OTH | 1.0 | (1.0) | 1.0 | (1.0) | * | * | 0.8 | (0.8) | 0.8 | (0.8) | * | * |

– This disclosure reports the quarter-on-quarter coverage over the 12 month period based on the details requested as per Table 17: Interest rate risk in the banking book in the 2023 revision of APS 330.

– Impacts reflect the change in economic value associated with each shock scenario.

– Though reported impacts reflect inclusion/exclusion of APRA's rolling 1yr Earnings Offset, BEN's internal Investment Term of Capital (IToC) is set at 2.5yrs.

* Reflecting that the Bank determines its risk-weights using the standardised approach, IRRBB RWA does not form part of our total reported RWA.

# DIS75 – CCyB1
# Geographical distribution of credit exposures used in the calculation of the bank-specific countercyclical capital buffer requirement

Amounts are in millions to 1 decimal place

Bendigo Bank

Table CCyB1 sets out the geographic distribution of private sector (excluding sovereign and bank) credit exposures used to determine the ADI specific countercyclical capital buffer CCyB1 in accordance with APS 110. The CCyB1 requirement is calculated using the weighted average of the CCyB1 requirements applicable in the jurisdictions where private sector credit exposures are held.

| | | 30 Jun 25 | | | |
|---|---|---|---|---|---|
| | | a | c | d | e |
| | Geographical breakdown | Countercyclical capital buffer rate | Risk-weighted assets (RWA) used in the computation of the countercyclical capital buffer | Bank-specific countercyclical capital buffer rate | Countercyclical capital buffer amount |
| 1 | Australia | 1.00% | 36,168.2 | | |
| 2 | United Kingdom | 2.00% | 4.4 | | |
| 3 | Other locations | | | — | |
| 4 | **Total [1]** | | **36,172.6** | **1.00%** | **393.1** |

| | | 31 Dec 24 | | | |
|---|---|---|---|---|---|
| | | a | c | d | e |
| | Geographical breakdown | Countercyclical capital buffer rate | Risk-weighted assets (RWA) used in the computation of the countercyclical capital buffer | Bank-specific countercyclical capital buffer rate | Countercyclical capital buffer amount |
| 1 | Australia | 1.00% | 35,759.3 | | |
| 2 | United Kingdom | 2.00% | 4.4 | | |
| 3 | Other locations | — | — | — | |
| **4** | **Total [1]** | | **35,763.7** | **1.00%** | **388.7** |

1. Total of the risk-weighted amount of private sector (excludes sovereign and bank) credit exposures.

# DIS85 – LIQA
# Liquidity risk management

## Qualitative disclosure requirements related to Liquidity risk management

### a) Liquidity risk overview

The Group's liquidity risk is managed by Group Treasury, with oversight from Asset & Liability Management Committee (**ALMAC**) in accordance with the Board-approved RAS and the Group Liquidity Risk Management Policy, while following the three lines of defence model explained earlier.

Our primary objectives are to ensure that the Group can meet its cash flow commitments in a timely manner, under different market conditions and that the Group complies with regulatory requirements.

Liquidity and funding risk is measured, monitored and managed using both internal and regulatory models and metrics. Two key metrics used to manage funding and liquidity risks: are:

- The LCR, a short-term liquidity stress metric designed to ensure that an adequate level of unencumbered HQLA that can be quickly and easily converted into cash is maintained to meet liquidity needs for a 30-calendar day period under a severe liquidity stress scenario (as prescribed by APS 210).
- The NSFR, a medium-term structural funding metric designed to mitigate the risk of future funding stress by ensuring that assets are funded by a sufficient proportion of stable funding sources (also as prescribed by APS 210).

Internal funding and liquidity limits are informed by the outcomes of liquidity stress tests, and a framework of Early Warning Indicators (**EWI**) and escalation processes is in place to identify emerging risks and vulnerabilities.

Group Treasury is responsible for executing and monitoring the liquidity risk management strategy, ensuring compliance with both internal and regulatory requirements. This includes formulating the Funding Plan, managing HQLA holdings and maintaining access to wholesale funding markets.

Group Treasury provides regular reporting on the Group's liquidity and funding position to the ALMAC and the BRC.

### b) Group funding

Group Treasury prepares a three-year funding strategy which is reviewed on an annual basis and is aligned to internal policies and regulatory requirements. The objective is to maintain a well-balanced and diversified liability structure, avoiding unnecessary concentration risks by investor type, investor location, product type and tenor.

Funding strategy is informed by analysis of overall liquidity and funding requirements, ensuring the Group can support ongoing business operations even under challenging market conditions.

## c) Liquidity risk mitigation techniques

The Groups liquidity profile is structured to ensure that we have sufficient liquidity to satisfy current and prospective commitments in both normal and stressed conditions. This is achieved by:

- Maintaining adequate liquidity to meet daily payment obligations and regulatory liquidity requirements
- Ensuring access to a broad range of funding sources, including a stable base of core customer deposits and a diversified wholesale funding mix
- Timely risk measurement and reporting through Key Indicators Summary and EWI metrics
- A comprehensive program for liquidity stress testing and crisis management
- A three-lines-of-defence governance model provides independent oversight of liquidity risk management strategies, metrics, assumptions, and controls. The HQLA portfolio is managed in accordance with internal policies and is subject to minimum asset quality and other relevant controls and requirements.

## d) Stress testing

Board risk appetite is informed by the outcomes of a range of liquidity stress test scenarios of varying severity and duration. The primary objective of our methodology for setting Board liquidity risk appetite is to ensure that we are holding sufficient liquidity buffers to survive a range of name-specific and systemic scenarios of varying duration and severity. These are run on a monthly basis and reported to ALMAC, during business-as-usual conditions so that we have confidence in our ability to meet Board risk appetite and comply with regulatory requirements during periods of stress.

### Contingency funding plans

The Group's Contingency Funding Plan (**CFP**) specifies the Group's liquidity crisis response plan, including the processes, tools, responsibilities, mitigating actions and communications strategies that are expected to be deployed in order to maintain financial stability during stress periods.

The CFP includes an EWI framework, how EWIs are monitored and the escalation process that must be followed in the event that EWI triggers are activated.

Amounts are in millions to 1 decimal place

The LCR measures a bank's ability to meet its liquidity needs under an acute liquidity stress scenario (prescribed by APRA) measured over a 30-day-time frame. LCR is calculated as HQLA as a percentage of NCO.

Average LCR is calculated as a simple average of the daily observations over the quarter. The number of data points used is reported in the table.

| | | 30 Jun 25 | | 31 Mar 25 | |
|---|---|---|---|---|---|
| | | a | b | a1 | b1 |
| | | Total unweighted value [1] (average) | Total weighted value (average) | Total unweighted value [1] (average) | Total weighted value (average) |
| **High-quality liquid assets** | | | | | |
| 1a | High-quality liquid assets (**HQLA**) [2,3] | | 13,036.2 | | 13,417.6 |
| 1b | Alternate liquid assets (**ALA**) | | — | | — |
| 1c | Reserve Bank of New Zealand (**RBNZ**) securities | | — | | — |
| **Cash outflows** | | | | | |
| 2 | **Retail deposits and deposits from small business customers, of which:** | 46,078.5 | 3,730.0 | 44,556.1 | 3,840.1 |
| 3 | Stable deposits | 28,878.1 | 1,443.9 | 26,117.9 | 1,305.9 |
| 4 | Less stable deposits | 17,200.4 | 2,286.1 | 18,438.2 | 2,534.2 |
| 5 | **Unsecured wholesale funding, of which:** | 7,226.3 | 4,124.1 | 7,144.6 | 4,008.4 |
| 6 | Operational deposits (all counterparties) and deposits in networks of cooperative banks | — | — | — | — |
| 7 | Non-operational deposits (all counterparties) | 6,104.9 | 3,002.7 | 6,281.8 | 3,145.6 |
| 8 | Unsecured debt | 1,121.4 | 1,121.4 | 862.8 | 862.8 |
| 9 | **Secured wholesale funding** | | 44.7 | | 31.9 |
| 10 | **Additional requirements, of which:** | 6,225.6 | 663.0 | 6,272.1 | 597.8 |
| 11 | Outflows related to derivative exposures and other collateral requirements | 292.5 | 292.5 | 223.1 | 223.1 |
| 12 | Outflows related to loss of funding on debt products | — | — | — | — |
| 13 | Credit and liquidity facilities | 5,933.1 | 370.5 | 6,049.0 | 374.7 |
| 14 | **Other contractual funding obligations** | 578.1 | 201.5 | 692.3 | 323.1 |
| 15 | **Other contingent funding obligations** | 18,723.1 | 1,577.1 | 19,294.4 | 1,627.5 |
| 16 | **Total cash outflows** | | **10,340.4** | | **10,428.8** |
| **Cash inflows** | | | | | |
| 17 | **Secured lending (e.g. reverse repos)** | 1,767.1 | — | 1,618.9 | — |
| 18 | **Inflows from fully performing exposures** | 756.5 | 380.0 | 742.2 | 373.1 |
| 19 | Other cash inflows | 106.4 | 106.4 | 50.5 | 50.5 |
| **20** | **Total cash inflows** | **2,630.0** | **486.4** | **2,411.6** | **423.6** |

| | | Total adjusted value | Total adjusted value |
|---|---|---|---|
| 21 | **Total HQLA** | **13,036.2** | **13,417.6** |
| 22 | **Total net cash outflows** | **9,854.0** | **10,005.2** |
| 23 | **Liquidity Coverage Ratio (%)** | **132.3%** | **134.1%** |
| Number of data points used in calculating the average figures (business days) | | 62 | 62 |

1. Unweighted inflow and outflow values are outstanding balances maturing or callable within 30 days.
2. Total HQLA represents liquid assets, including assets qualifying under alternative liquidity approaches.
3. Disclosed on a weighted basis only, consistent with the disclosure template prescribed by APS 330.

The Group's average LCR for the June 2025 quarter was 132% (March 2024: 134%), with liquid assets exceeding net cash outflows by an average of $3.2 billion.

The 2% reduction in LCR on a quarterly basis is a net effect of 2.8% quarterly average reduction in liquid assets partially offset by a 1.5% reduction in NCO's .

HQLA decreased by an average of $380 million, partly due to a Term Funding maturity. A $150 million decrease in average NCOs resulted from an updated retail/SME deposit stability classification methodology and a reduction in other contractual and contingent funding obligations.

Other contingent funding obligations largely consist of outflows for uncommitted credit and liquidity facilities, assumed buybacks of domestic debt securities and other contractual outflows.

Amounts are in millions to 1 decimal place

Bendigo Bank

The NSFR requires that a bank has sufficient ASF to cover its RSF over a one year horizon. The NSFR requires banks to hold sufficient stable funding to cover long term assets with a duration of greater than one year.

| | | 30 Jun 25 | | | | |
|---|---|---|---|---|---|---|
| | | a | b | c | d | e |
| | | Unweighted value by residual maturity | | | | |
| AUD | | No maturity | < 6 months | 6 months to < 1 year | ≥ 1 year | Weighted value |
| **Available stable funding (ASF) item** | | | | | | |
| 1 | **Capital:** | **6,182.7** | **—** | **—** | **1,227.5** | **7,410.2** |
| 2 | Regulatory capital | 6,182.7 | — | — | 1,227.5 | 7,410.2 |
| 3 | Other capital instruments | — | — | — | — | — |
| 4 | **Retail deposits and deposits from small business customers:** | **42,701.1** | **19,869.4** | **—** | **—** | **58,288.4** |
| 5 | Stable deposits | 28,832.7 | 10,664.3 | — | — | 37,522.2 |
| 6 | Less stable deposits | 13,868.4 | 9,205.1 | — | — | 20,766.2 |
| 7 | **Wholesale funding:** | **4,933.8** | **17,880.5** | **1,784.2** | **4,745.4** | **10,660.7** |
| 8 | Operational deposits | — | — | — | — | — |
| 9 | Other wholesale funding | 4,933.8 | 17,880.5 | 1,784.2 | 4,745.4 | 10,660.7 |
| 10 | **Liabilities with matching interdependent assets** | — | — | — | — | — |
| 11 | **Other liabilities:** | **—** | **1,688.9** | **—** | **275.6** | **275.6** |
| 12 | NSFR derivative liabilities [1] | | 16.8 | — | — | |
| 13 | All other liabilities and equity not included in the above categories | — | 1,672.1 | — | 275.6 | 275.6 |
| 14 | **Total ASF** | | | | | **76,634.9** |

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

Table continued overleaf

Amounts are in millions to 1 decimal place

Bendigo Bank

| AUD | a | b | c | d | e |
|---|---|---|---|---|---|
| | 30 Jun 25 | | | | |
| | Unweighted value by residual maturity | | | | |
| | No maturity | < 6 months | 6 months to < 1 year | ≥ 1 year | Weighted value |
| **Required stable funding (RSF) item** | | | | | |
| 15 **Total NSFR high-quality liquid assets (HQLA)** | | | | | **416.2** |
| 15a High-quality liquid assets (HQLA) | | | | | 416.2 |
| 15b Alternate liquid assets (ALA) | | | | | — |
| 15c Reserve Bank of New Zealand (RBNZ) securities | | | | | — |
| 16 **Deposits held at other financial institutions for operational purposes** | — | — | — | — | — |
| 17 **Performing loans and securities:** | **3,163.6** | **5,028.8** | **1,175.0** | **77,202.5** | **59,640.1** |
| 18 Performing loans to financial institutions secured by Level 1 HQLA | — | 3,410.1 | — | — | 341.0 |
| 19 Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions | — | 301.8 | 4.1 | 3,036.3 | 3,337.3 |
| 20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and PSEs, of which: | 3,163.6 | 1,033.2 | 945.0 | 9,152.8 | 12,213.4 |
| 21 With a risk weight of less than or equal to 35% under the APS 112[1] | 1,656.3 | 110.8 | 69.9 | 1,620.6 | 2,220.3 |
| 22 Performing residential mortgages, of which: | — | 268.5 | 200.7 | 64,745.8 | 43,500.7 |
| 23 Are standard loans to individuals with a LVR of 80 per cent or below[2] | — | 70.9 | 48.9 | 57,290.1 | 38,401.7 |
| 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities | — | 15.2 | 25.2 | 267.6 | 247.7 |
| 25 **Assets with matching interdependent liabilities** | — | — | — | — | — |
| 26 **Other assets:** | **2,681.4** | **1,460.3** | **17.7** | **1,474.2** | **5,616.1** |
| 27 Physical traded commodities, including gold | — | | | | — |
| 28 Assets posted as initial margin for derivative contracts and contributions to default funds of central counterparties[3] | | | | 116.5 | 99.0 |
| 29 NSFR derivative assets[3] | | | | 621.7 | 621.7 |
| 30 NSFR derivative liabilities before deduction of variation margin posted[3] | | | | 36.8 | 36.8 |
| 31 All other assets not included in the above categories | 2,681.4 | 685.3 | 17.7 | 1,474.2 | 4,858.6 |
| 32 **Off-balance sheet items**[3] | | — | — | **13,533.6** | **430.3** |
| **33 Total RSF** | | | | | **66,102.7** |
| **34 Net Stable Funding Ratio (%)** | | | | | **115.9%** |

1. The description of row 21 has been modified from that set out in the BCBS Disclosure Requirements standard to align with APS 210.
2. Comprises performing, unencumbered standard residential property loans to individuals with a residual maturity of one year or more, or no defined maturity, and a LVR of 80% or below, as defined under APS 112.
3. Disclosed in total and not by maturity bucket, consistent with the disclosure template prescribed by APS 330.

BEN's NSFR decreased from 117.3% in March 2025 to 115.9% in June 2025. The Group's ASF decreased over the quarter by $950 million predominantly driven by long term wholesale funding maturities moving out of >12-month maturity bucket. RSF is flat on a quarterly basis.

The Group's main sources of ASF were deposits from retail and small business customers (75%), wholesale deposits and funding (15%), and capital (10%). The major components of RSF on the Group's balance sheet were residential mortgages (67%), and non-residential mortgage lending (18%).

Amounts are in millions to 1 decimal place

| | | 31 Mar 25 | | | | |
|---|---|---|---|---|---|---|
| | | a | b | c | d | e |
| | | Unweighted value by residual maturity | | | | |
| AUD | | No maturity | < 6 months | 6 months to < 1 year | ≥ 1 year | Weighted value |
| **Available stable funding (ASF) item** | | | | | | |
| 1 | **Capital:** | **6,576.8** | **—** | **—** | **1,227.5** | **7,804.3** |
| 2 | Regulatory capital | 6,576.8 | — | — | 1,227.5 | 7,804.3 |
| 3 | Other capital instruments | — | — | — | — | — |
| 4 | **Retail deposits and deposits from small business customers:** | **42,273.5** | **20,183.0** | **—** | **—** | **57,854.8** |
| 5 | Stable deposits | 25,735.9 | 7,141.9 | — | — | 31,233.9 |
| 6 | Less stable deposits | 16,537.6 | 13,041.1 | — | — | 26,620.9 |
| 7 | **Wholesale funding:** | **4,707.5** | **17,480.2** | **1,880.9** | **5,770.6** | **11,685.6** |
| 8 | Operational deposits | — | — | — | — | — |
| 9 | Other wholesale funding | 4,707.5 | 17,480.2 | 1,880.9 | 5,770.6 | 11,685.6 |
| 10 | **Liabilities with matching interdependent assets** | **—** | **—** | **—** | **—** | **—** |
| 11 | **Other liabilities:** | **—** | **1,290.7** | **—** | **243.5** | **243.5** |
| 12 | NSFR derivative liabilities [1] | | 6.3 | — | — | |
| 13 | All other liabilities and equity not included in the above categories | — | 1,284.4 | — | 243.5 | 243.5 |
| 14 | **Total ASF** | | | | | **77,588.2** |

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

Table continued overleaf

Amounts are in millions to 1 decimal place

Bendigo Bank

| | | 31 Mar 25 | | | | |
|---|---|---|---|---|---|---|
| | | a | b | c | d | e |
| | | Unweighted value by residual maturity | | | | |
| AUD | | No maturity | < 6 months | 6 months to < 1 year | ≥ 1 year | Weighted value |
| **Required stable funding (RSF) item** | | | | | | |
| 15 | **Total NSFR high-quality liquid assets (HQLA)** | | | | | **563.5** |
| 15a | High-quality liquid assets (HQLA) | | | | | 563.5 |
| 15b | Alternate liquid assets (ALA) | | | | | — |
| 15c | Reserve Bank of New Zealand (RBNZ) securities | | | | | — |
| 16 | **Deposits held at other financial institutions for operational purposes** | — | — | — | — | — |
| 17 | **Performing loans and securities:** | **2,963.1** | **1,867.2** | **1,223.1** | **77,951.2** | **59,704.6** |
| 18 | Performing loans to financial institutions secured by Level 1 HQLA | — | 450.3 | — | — | 45.0 |
| 19 | Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions | — | 303.5 | 1.8 | 3,190.6 | 3,488.1 |
| 20 | Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and PSEs, of which: | 2,963.1 | 842.3 | 998.8 | 9,067.4 | 11,893.1 |
| 21 | With a risk weight of less than or equal to 35% under the APS 112 [2] | 1,692.1 | 105.2 | 81.6 | 1,611.6 | 2,240.8 |
| 22 | Performing residential mortgages, of which: | — | 271.1 | 207.3 | 65,400.6 | 44,022.1 |
| 23 | Are standard loans to individuals with a LVR of 80 per cent or below [3] | — | 77.2 | 48.8 | 57,572.2 | 38,601.9 |
| 24 | Securities that are not in default and do not qualify as HQLA, including exchange-traded equities | — | — | 15.2 | 292.6 | 256.3 |
| 25 | **Assets with matching interdependent liabilities** | — | — | — | — | — |
| 26 | **Other assets:** | **3,182.7** | **970.6** | **25.3** | **1,256.8** | **5,418.4** |
| 27 | Physical traded commodities, including gold | — | | | | — |
| 28 | Assets posted as initial margin for derivative contracts and contributions to default funds of central counterparties [1] | | | | 113.4 | 96.4 |
| 29 | NSFR derivative assets [1] | | | | 513.2 | 513.2 |
| 30 | NSFR derivative liabilities before deduction of variation margin posted [1] | | | | 20.2 | 20.2 |
| 31 | All other assets not included in the above categories | 3,182.7 | 323.8 | 25.3 | 1,256.8 | 4,788.6 |
| 32 | **Off-balance sheet items [1]** | | — | — | **13,739.8** | **448.4** |
| **33** | **Total RSF** | | | | | **66,134.9** |
| **34** | **Net Stable Funding Ratio (%)** | | | | | **117.3%** |

1. Disclosed in total and not by maturity bucket, consistent with the disclosure template prescribed by APS 330.
2. The description of row 21 has been modified from that set out in the BCBS Disclosure Requirements standard to align with APS 210.
3. Comprises performing, unencumbered standard residential property loans to individuals with a residual maturity of one year or more, or no defined maturity, and a LVR of 80% or below, as defined under APS 112.