



**■ NIBC**

CAPITAL ADEQUACY AND RISK  
MANAGEMENT REPORT 2021

PILLAR 3

# REMUNERATION POLICY

The Supervisory Board reviewed and amended NIBC's remuneration policies in 2021. The review took into account all relevant laws, regulations and guidelines: the Dutch Banking Code, the DNB Principles on Sound Remuneration Policies (DNB principles), EBA Guidelines on Sound Remuneration, CRDV and the Dutch remuneration legislation for financial services companies (*Wet beloningsbeleid financiële onderneming (WbFO)*).

NIBC's remuneration policy is sustainable, balanced and in line with our chosen strategy and risk appetite. It revolves around these six key principles: remuneration is (i) aligned with business strategy and sustainability ambitions; (ii) appropriately balanced between short and long term; (iii) differentiated and linked to the achievement of performance objectives and the results of the bank; (iv) externally competitive and internally fair; (v) managed in an integrated manner that takes into account total compensation and (vi) is determined in a gender neutral way.

The *Remuneration and Nominating Committee (RNC)* and the Supervisory Board believe NIBC's remuneration policy responsibly links performance and reward and is compliant with the applicable laws, regulations and guidelines. The Supervisory Board continues to believe in prudent management of remuneration whilst recognising that NIBC operates in a competitive market place where it needs to be able to attract, motivate and retain sufficient talent. NIBC is determined to make a positive contribution towards fair compensation practices in the banking sector in consultation with its stakeholders. Furthermore, we aim to create the level playing field that regulators envisage with regard to variable compensation.

The 2021 Annual Report contains a detailed overview of NIBC's remuneration policy.

**EU REM1 - Remuneration awarded for the financial year as of 31 December 2021**

| in EUR thousands             |   | MB Supervisory function | MB Management function | Other senior management | Other identified staff |
|------------------------------|---|-------------------------|------------------------|-------------------------|------------------------|
| <b>Fixed remuneration</b>    |   |                         |                        |                         |                        |
| 1                            | Number of identified staff  | 8                       | 3                      | 35                      | 7                      |
| 2                            | Total fixed remuneration  | 881                     | 4,712                  | 10,569                  | 1,425                  |
| 3                            | Of which: cash-based  | 881                     | 4,712                  | 10,569                  | 1,425                  |
| 4                            | (Not applicable in the EU)  |                         |                        |                         |                        |
|                              | Of which: shares or equivalent ownership interests                    | -                       | -                      | -                       | -                      |
| EU-4a                        | Of which: share-linked instruments or equivalent non-cash instruments | -                       | -                      | -                       | -                      |
| 5                            | Of which: other instruments   | -                       | -                      | -                       | -                      |
| EU-5x                        | (Not applicable in the EU)  |                         |                        |                         |                        |
| 6                            | Of which: other forms   | -                       | -                      | -                       | -                      |
| 7                            | (Not applicable in the EU)  |                         |                        |                         |                        |
| 8                            |   |                         |                        |                         |                        |
| <b>Variable remuneration</b> |   |                         |                        |                         |                        |
| 9                            | Number of identified staff  | 8                       | 3                      | 35                      | 7                      |
| 10                           | Total variable remuneration   | -                       | 4,435                  | 1,564                   | 113                    |
| 11                           | Of which: cash-based  | -                       | 2,217                  | 782                     | 76                     |
| 12                           | Of which: deferred  | -                       | 1,330                  | 469                     | 23                     |
|                              | Of which: shares or equivalent ownership interests                    | -                       | -                      | -                       | -                      |
| EU-13a                       | Of which: deferred  | -                       | -                      | -                       | -                      |
| EU-14a                       | Of which: share-linked instruments or equivalent non-cash instruments | -                       | 2,217                  | 782                     | 38                     |
| EU-13b                       | Of which: deferred  | -                       | 1,330                  | 436                     | 15                     |
| EU-14b                       | Of which: other instruments   | -                       | -                      | -                       | -                      |
| EU-14x                       | Of which: deferred  | -                       | -                      | -                       | -                      |
| EU-14y                       | Of which: other forms   | -                       | -                      | -                       | -                      |
| 15                           | Of which: deferred  | -                       | -                      | -                       | -                      |
| 16                           |   |                         |                        |                         |                        |
| 17                           | Total remuneration  | 881                     | 9,147                  | 12,134                  | 1,538                  |

**EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) as of 31 December 2021**

| in EUR thousands   |   | MB Supervisory function | MB Management function | Other senior management | Other identified staff |
|--|---|-------------------------|------------------------|-------------------------|------------------------|
| <b>Guaranteed variable remuneration awards</b>   |   |                         |                        |                         |                        |
| 1  | Guaranteed variable remuneration awards - Number of identified staff  | -                       | -                      | -                       | -                      |
| 2  | Guaranteed variable remuneration awards - Total amount  | -                       | -                      | -                       | -                      |
| 3  | Of which guaranteed variable remuneration awards paid during the financial year; that are not taken into account in the bonus cap | -                       | -                      | -                       | -                      |
| <b>Severance payments awarded in previous periods, that have been paid out during the financial year</b> |   |                         |                        |                         |                        |
| 4  | Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff    | -                       | -                      | 1                       | -                      |
| 5  | Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount                  | -                       | -                      | 530                     | -                      |
| <b>Severance payments awarded during the financial year</b>  |   |                         |                        |                         |                        |
| 6  | Severance payments awarded during the financial year - Number of identified staff   | -                       | -                      | 1                       | -                      |
| 7  | Severance payments awarded during the financial year - Total amount   | -                       | -                      | 47                      | -                      |
| 8  | Of which paid during the financial year   | -                       | -                      | 47                      | -                      |
| 9  | Of which deferred   | -                       | -                      | -                       | -                      |
| 10   | Of which severance payments paid during the financial year; that are not taken into account in the bonus cap                      | -                       | -                      | -                       | -                      |
| 11   | Of which highest payment that has been awarded to a single person   | -                       | -                      | 47                      | -                      |

## EU REM3 - Deferred remuneration as of 31 December 2021

in EUR thousands

|    | Deferred and retained remuneration                          | Total amount of deferred remuneration awarded for previous performance periods | Of which due to vest in the financial year | Of which vesting in subsequent financial years | Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year | Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years | Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments) | Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year | Total amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods |
|----|---|--|--|--|---|---|---|---|---|
| 1  | MB Supervisory function                                     |  |  |  |   |   |   |   |   |
| 2  | Cash-based  |  |  |  |   |   |   |   |   |
| 3  | Shares or equivalent ownership interests                    |  |  |  |   |   |   |   |   |
| 4  | Share-linked instruments or equivalent non-cash instruments |  |  |  |   |   |   |   |   |
| 5  | Other instruments   |  |  |  |   |   |   |   |   |
| 6  | Other forms   |  |  |  |   |   |   |   |   |
| 7  | MB Management function                                      | 2,265  | 511  | 313  |   |   | 290   | 117   | 1,480   |
| 8  | Cash-based  | 162  | 80   | 82   |   |   |   | 80  |   |
| 9  | Shares or equivalent ownership interests                    | 1,786  | 357  | 151  |   |   | 250   |   | 1,278   |
| 10 | Share-linked instruments or equivalent non-cash instruments | 317  | 73   | 80   |   |   | 40  | 37  | 203   |
| 11 | Other instruments   |  |  |  |   |   |   |   |   |
| 12 | Other forms   |  |  |  |   |   |   |   |   |
| 13 | Other senior management                                     | 2,449  | 801  | 780  |   |   | 210   | 611   | 908   |
| 14 | Cash-based  | 691  | 331  | 360  |   |   |   | 331   |   |
| 15 | Shares or equivalent ownership interests                    | 849  | 170  | 72   |   |   | 119   |   | 607   |
| 16 | Share-linked instruments or equivalent non-cash instruments | 909  | 300  | 349  |   |   | 91  | 280   | 300   |
| 17 | Other instruments   |  |  |  |   |   |   |   |   |
| 18 | Other forms   |  |  |  |   |   |   |   |   |
| 19 | <b>Other identified staff</b>                               | <b>216</b>   | <b>82</b>                                  | <b>94</b>                                      |   |   | <b>12</b>   | <b>87</b>   | <b>39</b>   |
| 20 | Cash-based  | 91   | 43   | 48   |   |   |   | 43  |   |
| 21 | Shares or equivalent ownership interests                    |  |  |  |   |   |   |   |   |
| 22 | Share-linked instruments or equivalent non-cash instruments | 125  | 39   | 46   |   |   | 12  | 43  | 39  |
| 23 | Other instruments   |  |  |  |   |   |   |   |   |
| 24 | Other forms   |  |  |  |   |   |   |   |   |
| 25 | <b>Total amount</b>   | <b>4,930</b>   | <b>1,394</b>                               | <b>1,187</b>                                   |   |   | <b>511</b>  | <b>815</b>  | <b>2,427</b>  |

**EU REM4 - Remuneration of 1 million EUR or more per year as of 31 December 2021**

|           | EUR                          | Identified staff that are high earners as set out in Article 450(i) CRR |
|-----------|------------------------------|---|
| <b>1</b>  | 1 000 000 to below 1 500 000 |   |
| <b>2</b>  | 1 500 000 to below 2 000 000 |   |
| <b>3</b>  | 2 000 000 to below 2 500 000 |   |
| <b>4</b>  | 2 500 000 to below 3 000 000 | 2   |
| <b>5</b>  | 3 000 000 to below 3 500 000 |   |
| <b>6</b>  | 3 500 000 to below 4 000 000 | 1   |
| <b>7</b>  | 4 000 000 to below 4 500 000 |   |
| <b>8</b>  | 4 500 000 to below 5 000 000 |   |
| <b>9</b>  | 5 000 000 to below 6 000 000 |   |
| <b>10</b> | 6 000 000 to below 7 000 000 |   |
| <b>11</b> | 7 000 000 to below 8 000 000 |   |

**EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) as of 31 December 2021**

| in EUR thousands | Management body remuneration           |                        |          | Business areas     |                |                  |                     |  |           |       |     |       |        |       |       |   |       |       |       |  |
|------------------|--|------------------------|----------|--------------------|----------------|------------------|---------------------|--|-----------|-------|-----|-------|--------|-------|-------|---|-------|-------|-------|--|
|                  | MB Supervisory function                | MB Management function | Total MB | Investment banking | Retail banking | Asset management | Corporate functions | Independent internal control functions | All other | Total |     |       |        |       |       |   |       |       |       |  |
| <b>1</b>         | Total number of identified staff       |                        |          |                    |                |                  |                     |  |           |       | 53  |       |        |       |       |   |       |       |       |  |
| <b>2</b>         | Of which: members of the MB            |                        |          |                    |                |                  |                     |  |           |       | 8   | 3     | 11     |       |       |   |       |       |       |  |
| <b>3</b>         | Of which: other senior management      |                        |          |                    |                |                  |                     |  |           |       |     |       | 11     | 7     | -     | 9 | 5     | 3     |       |  |
| <b>4</b>         | Of which: other identified staff       |                        |          |                    |                |                  |                     |  |           |       |     |       | -      | -     | -     | 7 | -     | -     |       |  |
| <b>5</b>         | Total remuneration of identified staff |                        |          |                    |                |                  |                     |  |           |       | 881 | 9,147 | 10,028 | 4,384 | 2,268 | - | 4,394 | 1,555 | 1,071 |  |
| <b>6</b>         | Of which: variable remuneration        |                        |          |                    |                |                  |                     |  |           |       | -   | 4,435 | 4,435  | 715   | 326   | - | 473   | 163   | -     |  |
| <b>7</b>         | Of which: fixed remuneration           |                        |          |                    |                |                  |                     |  |           |       | 881 | 4,712 | 5,593  | 3,669 | 1,941 | - | 3,922 | 1,391 | 1,071 |  |

