



KBC BANK NV (USA)
U.S. RESOLUTION PLAN
SECTION 1 - PUBLIC SECTION

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1 INTRODUCTION

US REGULATORY CONTEXT

KBC Bank NV (“KBC Bank”) developed its U.S. Resolution Plan, as required by the Federal Deposit Insurance Corporation (“FDIC”) and the Board of Governors of the Federal Reserve System (“FRB”) issued, pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act final rule section 165(d). This rule stipulates that any foreign bank or company that is, or is treated as, a bank holding company under the International Banking Act of 1978, with total consolidated assets of \$50 billion or more and total U.S. non-bank assets of \$100 billion or less, is a covered company and is required to periodically submit to the FDIC and the FRB a plan for rapid and orderly resolution [under the Bankruptcy Code] in the event of material distress or failure.

The FDIC and the FRB have each, by rule and through supervisory guidance, prescribed the assumptions, required approach and scope for the resolution plan. This resolution plan was developed based upon these requirements and guidelines. Except as otherwise specifically required by the Final Rule, the information contained in the U.S. Resolution Plan relates to branches and subsidiaries, core business lines and critical operations, as applicable, that are domiciled in the U.S. or conducted in whole or in material part in the U.S.

The US Resolution Plan is being filed pursuant to the regulatory requirements and provides for the continuation of KBC Bank’s U.S. critical operations and the orderly transfer of customers to other providers of U.S. services, customer accounts and other property with minimum disruption. The U.S. Resolution Plan is not expected to require government support and would not result in losses being borne by the US government.

PUBLIC SECTION OF THE RESOLUTION PLAN

This document is the **Public Section** of KBC Bank’s U.S. Resolution Plan for the rapid and orderly resolution of the U.S. operations of KBC Bank NV.

KBC Bank recognizes that the requirement for a Resolution Plan is a regulatory initiative to enhance the safety and soundness of the U.S. financial system. The plan was developed based on this objective.

1.1 OVERVIEW OF KBC BANK

GLOBAL STRUCTURE

KBC Bank is a wholly-owned subsidiary of KBC Group NV. It was established in Belgium in 1998 as a bank (with number BE-0462.920.226), and operates under the laws of the Kingdom of Belgium. KBC Bank Group (i.e. KBC Bank and its fully consolidated subsidiaries) is one of Belgium’s largest bank groups with total consolidated assets of approximately €373 billion as of December 31, 2024. KBC Bank conducts most of its operations and derives most of its income from its operations in the Belgian and Central & Eastern European markets. KBC Bank Group also has operations outside of these areas, mainly in Western Europe, Asia and North America.

KBC Bank is registered as a credit institution and is supervised by (i) the National Bank of Belgium, which is the prudential supervisory authority in Belgium, (ii) the Autoriteit Financiële Diensten En Markten (FSMA), which has supervisory responsibility with regard to the conduct of business rules for financial institutions and market regulation and (iii) the European Central Bank

KBC Bank Group provides a broad range of banking and financial products and services to its private, corporate and public sector clients, including traditional deposit-taking and lending (including residential mortgage lending), relationship banking services to its different client segments, retail and private bancassurance and corporate banking and capital markets activities. In addition, KBC Bank Group is a large asset manager in Belgium. KBC Bank Group maintains an extensive Belgian retail network and an international network of branches, representative offices and subsidiaries in countries outside of Belgium.

KBC Bank Group has retained a solid buffer over and above the minimum capital requirements set by the relevant regulators.

KBC Group - EUR bln	31.Dec. 2024
Total Assets	373
Risk Weighted Assets	115
Net Stable Funding Ratio (NFSR)	139%
Liquidity Coverage Ratio (LCR)	158%
Tier 1 (CET 1)ratio	15%

U.S. STRUCTURE OF COVERED ENTITIES

KBC Bank's business in the U.S. is focused on its international corporate lending activities, particularly as distribution channel to corporate customers with operations in KBC Bank's core markets (i.e. Belgium and a number of countries in Central & Eastern Europe).

U.S. activities of KBC Bank are booked in and managed by KBC Bank NV, New York Branch ("KBCNY"). KBC NY is an unincorporated branch of KBC Bank that operates pursuant to a license issued by the Superintendent of Banks of the State of New York Department of Financial Services ("NYDFS"). KBCNY is not FDIC insured and not a retail branch. KBCNY has been conducting banking activities in New York for the past 48 years.

2 MATERIAL US ENTITIES

Under the requirements of the Rule, covered companies are required to assess their United States banking operations for the presence of "material entities", "critical operations," and "core business lines".

Under the Final Rule, a "Material Entity" means a subsidiary or foreign office of the covered company that is significant to the activities of a critical operation or core business line. KBC Bank has determined that it has no core business lines and no critical operations for purposes of the Final Rule.

3. CORE BUSINESS LINES AND CRITICAL OPERATIONS

Core business lines is defined in the Final Rule as the business lines of the covered company which are conducted in whole or material part in the U.S., and the failure of which would result in a material loss of revenue, profit or franchise value to the covered company. Critical operations are defined in the Final Rule as those operations of the covered company, including associated services, functions and support, the failure or discontinuance of which, in the view of the covered company or as jointly directed by the Agencies, would pose a threat to the financial stability of the United States. KBC Bank has determined that it has no core business lines for purposes of the Final Rule.

4 SUMMARY FINANCIAL INFORMATION REGARDING ASSETS, LIABILITIES, CAPITAL AND MAJOR FUNDING SOURCES

As of December 31, 2024, KBC NY's total assets were \$5.5 billion. The majority of KBC NY's assets were comprised of loans, leases, cash and balances due from depository institutions. As of December 31, 2024, KBC NY's total liabilities were \$5.5 billion.

As KBC NY is a branch of KBC Bank, KBC NY does not hold standalone capital and is not subject to standalone regulatory capital minimums. KBC Group has strong capital ratio:

KBC Group	31.Dec.2024
Tier 1 (CET 1) ratio	15%

KBC NY's funding strategy is to develop a maintain access to a diverse variety of funding sources, geographically and by funding source. KBC NY has access to the discount window at the FRB. Funding sources are mainly unsecured.

5 DERIVATIVE AND HEDGING ACTIVITIES

Derivatives are used to hedge interest rate exposures and when they meet the required criteria for hedge effectiveness, hedge accounting is applied. Derivatives are not entered into on behalf of customers, for trading. There are no other derivatives or hedging activities.

6 MEMBERSHIPS IN MATERIAL PAYMENT, CLEARING AND SETTLEMENT SERVICES

KBC NY maintains memberships and/or participates in (either directly or indirectly) various financial market utilities ("FMUs"), including:

Clearing House Interbank Payments System	Payments
Fedwire Funds Service	Payments
Fed ACH Services	Payments

Society for Worldwide Interbank Financial Telecommunication	Messaging
The Depository Trust Company	Clearing and Settlement

7 FOREIGN OPERATIONS

As a branch, KBC NY i has no branches, subsidiaries, associates or joint ventures. KBC NY has no foreign operations.

8 MATERIAL SUPERVISORY AUTHORITIES

KBC NY is subject to regulation under U.S. federal and state laws. The FRB acts as an “umbrella regulator”. The principal supervisory authority for KBC NY is the New York State Department of Financial Services.

9 PRINCIPAL OFFICERS

The chart below depicts the members of the KBCNY Management Committee with each member’s responsibilities as of 31 December 2024. KBCNY Management Committee is responsible for the day-to-day operational management of KBCNY.

Title
Jo Vander Stuyft, General Manager
Diane M. Grimmig, Managing Director - General Counsel & Chief Compliance Officer
Hristina Zapryanova, Director - Head of Human Resources
Siobhan Doherty, Director – Head of Risk Management
Daisy Wang, Managing Director- Chief Credit Officer
Francis Payment, Managing Director- Head of Special Assets
Rahul Patel, Managing Director, Head of Information Technology
Rogério Pestana, Managing Director- Chief Operations Officer

10 RESOLUTION PLANNING CORPORATE GOVERNANCE STRUCTURE AND PROCESSES RELATED TO RESOLUTION PLANNING

The governance structure for the U.S. Resolution Plan consists of a US steering committee and a working group. The US steering committee is comprised of members of the KBC NY Management Committee. It is responsible for the overall oversight and control of the U.S. Resolution Plan. , including reviewing the U.S. Resolution Plan deliverables and making recommendations. KBC NY has a U.S. resolution working group comprised of senior business, operations, and control function representatives. The U.S. resolution working group is responsible for the efficient delivery of requirements, and ensuring leverage of the entire organization to effectively address the regulatory requirements.

11 MATERIAL MANAGEMENT INFORMATION SYSTEMS

KBCNY utilizes comprehensive and effective information technology and management information systems (“MIS”) to monitor and report its finances, liquidity, and operations to local management, Head Office management and relevant US regulatory authorities. MIS is utilized to provide transparent, accurate, reliable and timely financial, transactional and operational information that can be used by (i) management to make sound decisions regarding finances, business activities, risk, compliance matters and operational support, and (ii) regulators to supervise and examine KBCNY appropriately. The management information and reports used by management to conduct business have been used to support the development of the US Resolution Plan.

12 HIGH LEVEL SUMMARY OF RESOLUTION STRATEGY

KBC NY would be liquidated under New York State Banking Law. Pursuant to New York law, the Superintendent of the NYDFS administers substantial resolution policies and procedures to which KBC NY would be subject.