Ecology
Building Society

CAPITAL REQUIREMENTS DIRECTIVE

Pillar 3 Disclosures

For the year ended 31 December 2022

Building a greener society

Contents

1. Overview

1.1 Introduction

This document provides information on the capital position and the regulatory risk management of the Society as at 31 December 2022.

The Society operates under a supervisory framework enforced in the UK by the Prudential Regulation Authority (PRA). The global standards for capital adequacy set under the Basel Accords are set out in the Capital Requirements Directive IV (CRD IV), which is implemented in the PRA rulebook, and in the Capital Requirements Regulation (CRR) which is directly applicable, without implementation in national legislation. The capital requirements legislation sets out the rules that determine the amount of capital institutions must hold to provide security for members and depositors. It consists of three main elements, referred to as "Pillars":

- Pillar 1: sets out the minimum regulatory capital requirements focused on credit, market and operational risk. The Ecology uses the Standardised Approach to calculate credit risk which is expressed as 8% of the risk weighted exposure amounts for each applicable exposure class. Capital required to cover operational risk is assessed under the Basic Indicator Approach.
- Pillar 2: is an assessment of any additional capital resources required to cover the specific risks faced by the Society that are not covered, or not fully covered, by the minimum regulatory capital resource requirement set out under Pillar 1. This review is documented in the Society's Internal Capital Adequacy Assessment Process (ICAAP) and is then subject to the PRA's Supervisory Review and Evaluation Process (SREP).
- Pillar 3: requires disclosure of key information on the Society's capital adequacy, risk exposures and risk management processes, as published in this document. Pillar 3 also provides details of the remuneration of certain colleagues whose roles have a material impact on the firm's risk profile.

1.2. Basis of Preparation and Frequency of Disclosures

This document sets out the Pillar 3 Disclosures of the Ecology Building Society.

The Society falls within the definition of a "small and non-complex" institution per CRR Article 4 (145). The Society has observed the derogations permissible under PRA rulebook (CRR) Article 433(b) for small and non-complex institutions in the preparation of this Pillar 3 document.

This disclosure document applies only to the Ecology Building Society (FRN 162090) and all values within it have been drawn from the Society's Annual Report and Accounts as at 31 December 2022, unless otherwise stated.

The disclosures made are in accordance with Board Policy in relation to consideration of materiality, proprietary and confidentiality, have been reviewed by the Society's Board and are published on the Society's website (www.ecology.co.uk). The disclosures contained in this document are intended to provide background information on capital requirements and in that context the Society's approach to risk management; they are not subject to external audit and do not constitute a financial statement.

The disclosures are updated on an annual basis in accordance with the derogation provided in Article 433(b).

Row numbers in the tables in this document relate to the Prudential Regulation Authority (PRA) prescribed references within the standardised templates; in some cases, where rows contain a nil value, these have been excluded for improved clarity of disclosure.

1.3. Review and verification

The disclosures are subject to the same level of internal verification as applied to management reports included in the Society's financial statement disclosures. Where appropriate the disclosures have been reconciled to the externally audited accounts. The document has been subject to a second-line review, reviewed by the Society's Audit and Compliance Committee and approved by the Board on 3 March 2023 alongside the Annual Report and Accounts.

2. Summary of key disclosures

2.1 Key metrics

UK KM1 - Key metrics template		31-Dec-22 £000	31-Dec-21 £000
	Available own funds (amounts)		
1	Common Equity Tier 1 (CET1) capital	17,094	15,698
2	Tier 1 capital	17,094	15,698
3	Total capital	17,572	15,920
	Risk-weighted exposure amounts		
4	Total risk-weighted exposure amount	116,182	102,460
	Capital ratios (as a percentage of risk-weighted exposure amount)		
5	Common Equity Tier 1 ratio (%)	14.71%	15.32%
6	Tier 1 ratio (%)	14.71%	15.32%
7	Total capital ratio (%)	15.12%	15.54%
	Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)		
UK 7a	Tier	0.51%	1.15%
UK 7b	Tier	–	–
UK 7c	Tier	–	–
UK 7d	Tier	8.51%	9.15%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)		
8	Capital conservation buffer (%)	2.50%	2.50%
UK 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	1.00%	–
9	Institution specific countercyclical capital buffer (%)	–	–
UK 9a	Systemic risk buffer (%)	–	–
11	Combined buffer requirement (%)	3.50%	2.50%
UK 11a	Overall capital requirements (%)	12.01%	11.65%
12	CET1 available after meeting the total SREP own funds requirements (%)	6.20%	6.17%
	Leverage ratio		
13	Total exposure measure excluding claims on central banks	255,826	234,505
14	Leverage ratio excluding claims on central banks (%)	6.68%	6.69%
	Liquidity Coverage Ratio**		
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	51,972	53,601
UK 16a	Cash outflows - Total weighted value	25,246	24,205
UK 16b	Cash inflows - Total weighted value	6,462	8,136
16	Total net cash outflows (adjusted value)	18,784	16,069
17	Liquidity coverage ratio (%)	277%	334%
	Net Stable Funding Ratio		
18	Total available stable funding	283,607	240,473
19	Total required stable funding	146,967	132,680
20	NSFR ratio (%)	193%	181%

* Total capital requirement of 8.4% of RWAs plus a £130,000 fixed add-on (2021: 9% of RWAs plus a £151,000 fixed add-on)
**Based on 12 point average over the preceding 12 months. The LCR at 31 December 2022 was 381% (2021: 256%)

2.2 Overview of Risk Weighted Exposure Amounts (RWEAs)

The Society's RWEAs and credit risk exposures under the Standardised Approach:

Template UK OV1 – Overview of risk weighted exposure amounts		**Risk weighted exposure amounts (RWEAs)**		**Total own funds requirements**
		a	b	c
		31-Dec-22	31-Dec-21	31-Dec-22
1	Credit risk (excluding CCR)	105,851	93,841	8,468
2	Of which the standardised approach	105,851	93,841	8,468
3	Of which the foundation IRB (FIRB) approach	–	–	–
4	Of which slotting approach	–	–	–
UK 4a	Of which equities under the simple riskweighted approach	–	–	–
5	Of which the advanced IRB (AIRB) approach	–	–	–
6	Counterparty credit risk - CCR	–	–	–
7	Of which the standardised approach	–	–	–
8	Of which internal model method (IMM)	–	–	–
UK 8a	Of which exposures to a CCP	–	–	–
UK 8b	Of which credit valuation adjustment - CVA	–	–	–
9	Of which other CCR	–	–	–
15	Settlement risk	–	–	–
UK 22a	Large exposures	–	–	–
23	Operational risk	10,331	8,619	827
UK 23a	Of which basic indicator approach	10,331	8,619	827
UK 23b	Of which standardised approach	–	–	–
UK 23c	Of which advanced measurement approach	–	–	–
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	–	–	–
29	**Total**	**116,182**	**102,460**	**9,295**

3. Risks and their Management

3.1 Overview

Further detail on risk management objectives, policies, strategy, appetite and analysis of principal risk categories can be found in the Directors' Report on pages 40 to 46 of the 2022 Annual Report and Accounts.

3.2 Risk Statement

The Board of Directors has overall responsibility for the Society's internal control system and for reporting its effectiveness to the members in the annual financial statements. There is a formal structure for identifying reporting, monitoring, and managing risks. This comprises, at its highest level, risk appetite statements which are set and approved by the Board and are supported by granular risk appetite measures across the principal risk categories. This is underpinned by a Risk Management Framework (RMF) which sets out the high-level policy, standards, roles, responsibilities, governance, and oversight for the management of all principal risks.

Risk appetite is translated into specific measures, which are tracked, monitored and reported to the Risk Committee and RACE. The RMF has been designed to create clear links to the strategic planning process whereby appropriate metrics and limits for each risk category are established, calibrated and reported.

The Society uses the three lines of defence approach to risk management, full details of which are given on page 40 of the Annual Report and Accounts.

Risk culture

A critical supporting factor of the RMF is the Society's risk culture, which is a shared set of values and behaviours that defines how all colleagues approach the management of risk. This culture begins at the top of the Society with the Board and Senior Leadership Team and extends to all colleagues who are provided with relevant training and opportunities throughout the year in relation to risk management.

The Society has elected to omit specific details relating to individual risk appetite measures as they are considered proprietary information as per CRR article 432.

3.3 Board Declaration on Adequacy of Risk Management Arrangements

The three-year Annual Operating Plan is approved by the Board and is re-examined at each ALCO based on the most recent re-forecast. The capital position is closely monitored over the period of the plan and in the light of downside stress considerations. The Society's ICAAP provides reassurance as to the adequacy of capital in both forecast and stress conditions. The Board's RMF defines risk appetites for each major category of risk and monitoring of key metrics is undertaken to observe these limits.

The Board can therefore confirm that, in its opinion, there is adequate capital to meet the current capital resources requirements and that this will continue over the period of the Annual Operating Plan.

3.4 Strategies and processes to managing each category of Risk

3.4.1 Credit risk

Credit risk 'The risk of financial loss due to members or organisations failing to meet their obligations.' The arrears strategy plays a key part in credit risk management; it is therefore crucial that arrears management effectiveness is identified, measured, managed, monitored, reported appropriately and aligns to the credit risk strategy.

The Board sets the risk appetite for both lending (residential, commercial and investments) and treasury activities.

Managing the profile of the lending to new and existing customers, both residential and commercial, is key to the ongoing management of the Society's exposure to credit risk. This involves the continual optimisation of its strategies across all products, using both internal and external performance data, as well as ensuring the appropriate oversight of their performance. The risk of loss arising from mortgage and commercial lending has heightened during the year due to the cost-of-living crisis and rising interest rate environment. However, the Society manages this risk through a comprehensive analysis of both the creditworthiness of the borrower and the proposed security.

An aspect of credit risk is Concentration Risk, which in the asset portfolio can arise from product type, geographical concentration and over exposure to single borrowers, investors, or counterparties. As a Society that lends on a national basis, including Northern Ireland, the Society is not subject to an undue level of geographic concentration risk within the UK.

The activities of the Society are concentrated in residential lending and funded by retail investments. This model has long-term strength and the Society's deliberate focus on energy efficiency and environmental impacts of residential property ensures a high level of quality in the lending book and a higher degree of resilience than the mainstream market.

The Society's lending model which requires energy efficiency improvements ensures that there is no over-dependence on re-mortgage business and new applications arise both through direct application and through trusted intermediaries. Internal limits and the nature of the product range mitigate exposure to any property type or class of borrower, including more specialist books such as self-build and buy-to-let.

The Society takes particular note of concentration risk arising from large exposures which are a function of the relatively small size of the Society. This is controlled by close attention to the credit assessment process.

The Society has a small portfolio of investments that enable it to invest directly in renewable energy and to support other co-operative ventures. It includes renewable energy investments in the form of debentures featuring wind, solar, geothermal, tidal and biomass technologies. These are tradeable on a secondary market operated by Abundance Investment Ltd. All such investment activity requires approval by the Board.

Counterparty and country limits for treasury activity are set out in the Financial Risks Policy which is reviewed by the Board. The Society first of all seeks to identify potential counterparties with the most defensible records on a range of ethical criteria. This element itself is a strong indicator of counterparty quality and is reviewed at least annually, via internal analysis. Note is taken of external credit ratings as produced by Fitch and Moody's, which provide triggers for disengagement.

3.4.2 Operational risk

This is the risk of operational and / or Member harm resulting from inadequate or failed processes, people and systems or from external events.

The management of operational risk in the Society is addressed through ten sub-risks as part of the RMF. The fuller details of these together with operational risk management objectives and policies are disclosed in the Directors' Report on pages 43 to 44 of the 2022 Annual Report and Accounts, together with the strategies and processes to manage operational risks.

3.4.3 Liquidity and funding risk

Liquidity risk is the risk that the Society does not have sufficient financial resources available to meet its obligations as they fall due, can only do so at excessive cost, or is unable to meet regulatory prudential liquidity ratios. The Society's Board-approved liquidity policy is to maintain sufficient liquid resources to cover cash flow requirements and fluctuations in funding, to retain full public confidence in the solvency of the Society and to enable the Society to meet its financial obligations as they become due.

The Society manages liquidity and funding risk through continuous monitoring of cashflow and funding requirements. The Society's Internal Liquidity Adequacy Assessment Process (ILAAP) reviews the Society's liquidity requirements and informs the policy for liquidity management.

The Society performs liquidity stress testing, based on a range of adverse scenarios, for ALCO, in the ILAAP and in the Recovery Plan. There are liquidity contingency measures included within the Society's Recovery Plan. Stressed liquidity profiles are reported to every ALCO meeting.

3.4.4 Interest rate risk

Interest rate risk is the risk of exposure to movements in interest rates reflecting the mismatch between dates on which interest receivable on assets and interest payable on liabilities are next reset or, if earlier, the instruments' maturities. The Society is exposed to interest rate risk through its Treasury deposits and its guaranteed floor rate on certain savings accounts. The Society has no material exposure to fixed-rate mortgages or savings products at the present time. Interest rate risk exposure is monitored against limits by determining the effect on the Society's current net notional value of assets and liabilities for a parallel shift in interest rates equivalent to 200 basis points or 2% for all maturities, in line with regulatory requirements. The results are measured against the risk appetite for market risk which is currently set at a maximum of 3% of reserves. The Society also monitors the value of the impact of a prescribed series of six interest rate shocks set out by the European Banking Authority. Results are reported to ALCO and the Board. More information is given in Note 23 in the Annual Report and Accounts.

3.4.5 Capital risk

Capital risk is the risk that the Society fails to assess and maintain the adequacy of its capital. Capital adequacy is assessed through the Internal Capital Adequacy Assessment Process (ICAAP). Scenario analysis and stress testing is performed on key business risks to assist the Board in assessing whether the Society could survive a severe economic downturn and other severe business shocks.

3.4.6 Strategic risk

This is the risk that the Society does not have a fit-for-purpose strategic plan or has a plan that this is not supported by appropriate business plans, resulting in a risk to earnings, reputation and financial viability. The Society has management control processes in place, with business, capital and liquidity planning, including stress testing of adverse economic and interest rate scenarios.

3.4.7 Ethics risk

Ethics Risk is the risk of delivering poor or inappropriate outcomes for customers / members, giving rise to financial loss and reputational damage. Ethics risk incorporates the Society's oversight and management of conduct risk, including the FCA's Consumer Duty of Care.

The Society considers conduct risk to be a sub-set of wider ethical considerations and therefore maintains an overarching ethics risk framework, to ensure that good customer outcomes are embedded in the Society's culture.

3.4.8 Climate change risk

The risk that our strategy, financial planning and business activities fail to mitigate the impact of climate change.

Climate change poses risks to all individuals, businesses, governments and economies. Addressing the climate emergency is central to Ecology's mission and strategy, to enable sustainable building practices and communities. The Society's lending policy is focused on supporting the construction of properties to a high ecological standard, the renovation of existing properties to reduce energy demand, and sustainable economic activity. The Society's investments support renewable energy and co-operative community initiatives. There is comprehensive detail contained in the Society's climate-related disclosures on pages 11 to 34 of the Annual Report and Accounts.

4. Remuneration

4.1 Information relating to the process for remuneration policy and the bodies that oversee remuneration

The Board is committed to ensuring that it adheres to the principles enshrined in the remuneration rules, through remuneration practices which serve to reflect the values of the Society.

The Board has established a Remuneration Committee, which consists of three independent non-executive directors with the Chief Executive Officer and the Chief People Officer attending by invitation. Members of the committee are appointed by the Board following consideration and recommendation by the Nomination and Governance Committee.

From 1 January 2023 the committee is to be extended to form a People, Remuneration & Culture Committee and its terms of reference amended accordingly.

The committee has responsibility for:

- Ensuring that the Society's Remuneration Policy complies with the FCA's Remuneration Code and the Remuneration requirements of the PRA Rulebook together with any other relevant guidance.
- Reviewing workforce remuneration and related policies.
- Review, challenge and if thought fit, approve the design of, and determine targets for, any performance related pay schemes operated by the Society and approve the annual payments under such schemes.
- Proposing the remuneration of Executive Directors after due consideration of appropriate benchmarks and other relevant factors.

- Review, challenge and agree proposals form the Executive on the remuneration of those other members of the Senior Management / Executive as specified by the whole Board, specifically including the managers in compliance and risk management.
- Receive recommendations from the Executive on remuneration of the Non-Executive Directors.
- Decisions on grading and individual salaries remain the preserve of the Executive Directors (with input from Senior Management / Executive as appropriate) whilst subject to the overall budget set in the financial forecasts approved by the Board.

The terms of reference are available on the Society's website, at the Annual General Meeting or on request by writing to the Company Secretary.

The Remuneration Committee ensures that the Society's Remuneration Policy is consistent with the risk appetite of the Society, that it promotes sound and effective risk management and will not encourage any excessive risk taking. This will be done by ensuring that no members of staff receive rewards for the achievement of quantitative targets for the amount of business written.

In setting remuneration, the Committee takes account of fees, salaries and other benefits provided to directors and to other senior management of comparable institutions that are similar in size and complexity. Non-executive directors are paid fees only. Remuneration is set at a level that retains and attracts staff of the appropriate calibre.

The Committee met five times in 2022. Minutes of meetings are available to all Board members.

Use of External Consultants
In setting remuneration, the Chief Executive officer and the Committee considers the remuneration levels and structure of other building societies that are similar in size and complexity, as well as external market conditions. Periodically, a report may be commissioned from external consultants to assist in this process. In 2022 the Society engaged the services of Bence Associates Limited to review its remuneration structure.

4.2 Information on the link between pay and performance

The Society has a profit-based measurement for remuneration in that eligible staff can be rewarded over and above basic salary by means of a Performance Related Pay (PRP) scheme. The PRP scheme rewards individual members of staff based on their overall performance against a set of agreed performance objectives, none of which will be sales or profit target based.

The maximum amount payable to any one individual under the scheme rules is £3,750 and the total amount payable under the scheme is £50,000.

The scheme accommodates all the material risk takers, excluding the Executive Directors (Chief Executive Officer and Finance Director) for whom there is no variable pay scheme.

4.3 Material Risk Takers

The Remuneration Committee has determined there are 15 individuals as at December 2022 who are material risk takers and whose professional activities have a material impact on the Society's risk profile.

The categories of employees' cover:

- All members of the Society's Board (executive and non-executive)
- Employees who are members of the Senior Leadership Team such as Chief Operating Officer, Chief Risk Officer, Chief People Officer & Society Secretary.
- Staff member who heads a function such as Head of IT
- Staff members responsible for initiating credit proposals, or structuring credit products, which can result in such credit risk exposure such as Mortgage Manager and Community & Business Lending Manager.

4.4 Important design characteristics of the remuneration system

The Remuneration Policy is designed to consider the business strategy, objectives, risk appetite values and long-term interests of the Society. The remuneration approach reflects the Society's size and proportionality and is relatively simple and easy to administer.

The Society has an established policy that no basic salary will exceed eight times the lowest full grade salary. At the end of December 2022, the ratio was 5.68: 1 (2021: 6.72: 1). There may be prudential reasons why the Society is forced to exceed the pay ratio. The circumstances in which this arises might be triggered among other things by regulatory changes or guidance, or a challenging recruitment environment. Should such an exceedance occur, the Society would commit to explain the circumstances to the members in a transparent manner. This commitment to fairness is demonstrated by the Society's accreditation as a Living Wage employer.

The ratio of the percentage increase in annual total compensation for its highest paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest paid individual) is reported to the Remuneration Committee annually.

Remuneration is set at a level to be sufficiently attractive to recruit and retain the right people. Basic salary is accompanied by a benefits package which is designed to ensure a fair approach for all colleagues. Executive Directors and employees receive an 8% employer contribution to a stakeholder pension scheme.

There are no individuals currently remunerated at EURO 1 million (equivalent) or more per financial year.

4.5 Information on the criteria used for performance measurement

The financial metrics used to determine the variable pay under the PRP scheme are clear, measurable and agreed by the Remuneration Committee. The conditions which must be met to create a distributable pot of money under the scheme are clearly set out in the scheme rules and is subject to a total cap of £50,000 per scheme year. There may be conditions by which the scheme does not generate any variable pay i.e. when the profit earned after tax and distribution does not meet the minimum threshold.

Individuals have objectives set throughout the performance year which are documented, measured and assessed during the end of year appraisal process. The CEO has the discretion to decide whether an individual's performance is such that the payment of variable remuneration is not justified.

The Society does not apply malus and clawback arrangements due to the modest variable remuneration percentage for employees and zero variable remuneration for Executive Directors.

4.6 Policies and criteria applied for the award of guaranteed variable remuneration and severance payments

There is no guaranteed variable remuneration and therefore the Society has no specific policy on this matter. The Society's Redundancy Policy outlines only statutory redundancy payments will be made.

4.7 The ratios between fixed and variable remuneration set in accordance with Article 94(1) of CRD

Fixed remuneration forms a high proportion of the reward package balancing a stable source of income with a modest element of variable pay of between 0% and 5% of basic annual salary (excluding Executive Directors).

4.8 Quantitative information on remuneration

Template UK REM1 - Remuneration awarded for the financial year			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	7	5	3	
2		Total fixed remuneration	117	471	185	
3		Of which: cash-based	117	471	185	
4		(Not applicable in the UK)				
UK-4a		Of which: shares or equivalent ownership interests				
5		Of which: share-linked instruments or equivalent non-cash instruments				
UK-5x		Of which: other instruments				
6		(Not applicable in the UK)				
7		Of which: other forms				
8		(Not applicable in the UK)				
9	Variable remuneration	Number of identified staff				
10		Total variable remuneration		7	7	
11		Of which: cash-based		7	7	
12		Of which: deferred				
UK-13a		Of which: shares or equivalent ownership interests				
UK-14a		Of which: deferred				
UK-13b		Of which: share-linked instruments or equivalent non-cash instruments				
UK-14b		Of which: deferred				
UK-14x		Of which: other instruments				
UK-14y		Of which: deferred				
15		Of which: other forms				
16		Of which: deferred				
17	Total remuneration (2 + 10)		117	478	192	

Template UK REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)		MB Supervisory function	MB Management function	Other senior management	Other identified staff
	Guaranteed variable remuneration awards				
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				
	Severance payments awarded in previous periods, that have been paid out during the financial year				
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff				
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount				
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff		1		
7	Severance payments awarded during the financial year - Total amount		73		
8	Of which paid during the financial year		73		
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		73		

Template UK REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)		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
1	Total number of identified staff										**15**
2	Of which: members of the MB	7	5	12							
3	Of which: other senior management					3					
4	Of which: other identified staff										
5	Total remuneration of identified staff	117	478	595		192					
6	Of which: variable remuneration		7	7		7					
7	Of which: fixed remuneration	117	471	588		185					

5. Attestation

The Board confirms that to the best of its knowledge that the disclosures provided according to Disclosure Part of the PRA Rulebook (CRR) Instrument 2021 have been prepared in accordance with the internal control processes agreed upon at the management body level.

Approved by the Ecology Building Society and signed on its behalf by:

Gareth Griffiths

Chief Executive

7 March 2023

6. Contacts

For further information on any of the disclosures given in this document, please contact:

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