



Pillar 3 Disclosure Statement

State Street Brasil S.A Banco Comercial

December/2023

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1. SCOPE OF APPLICATION

State Street Brasil S.A Banco Comercial (“the Bank” or “SSBC”)’s Pillar 3 Disclosure Statement (“Report”) presents an overview of the Bank’s risk and capital management structures, in compliance with the regulatory requirements set forth in Resolution BACEN 54/2020 and taking into account the Bank’s classification in the S4 segment, as defined in Resolution CMN 4,553/2017.

The information contained in this report has a date as of December 31, 2023. In compliance with the regulatory requirements, this document is updated and published annually, more frequently, as necessary, or when there are significant changes in SSBC’s business. This report has not been independently audited.

The Risk department (“ERM Brazil”) is responsible for the update of this document. The Bank’s Statutory Directors are responsible for the information contained in this document as well as for its review and approval.

2. PUBLIC DISCLOSURE POLICY

SSBC’s Public Disclosure Policy sets forth the main aspects related to the preparation and publication of risk and capital management information, including principles, responsibilities and controls, following the requirements established in the article 56 of the Resolution CMN 4,557/2017.

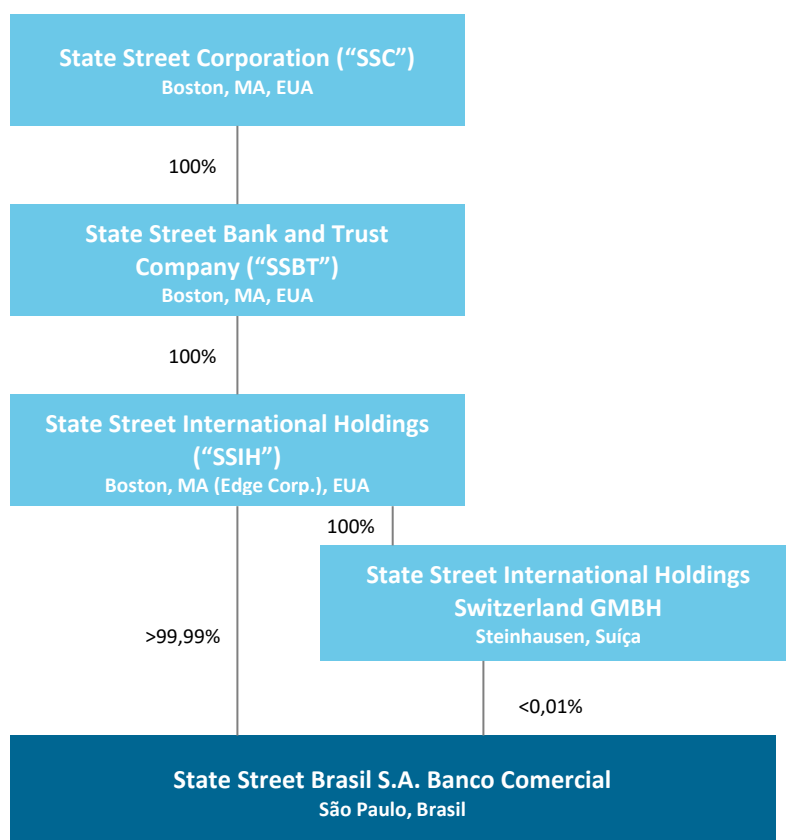
3. GENERAL INFORMATION

The Bank’s corporate structure, as well as its business profile and performance, are described in the following sections.

3.1 Company Structure

SSBC is authorized by the Central Bank of Brazil (“CBB”), under its attributions disposed by Federal Law nº 4,595, of December 31, 1964, to operate as a Commercial Bank and to perform all activities permitted by a commercial banking license.

In compliance with ownership requirements under Brazilian Law, State Street International Holdings (SSIH) holds directly all of the interests of State Street Brasil other than one share, held indirectly through its subsidiary SSIH Switzerland. State Street International Holdings, Boston, United States of America, is an Edge corporation wholly owned by State Street Bank and Trust Company (SSBT), Boston, United States of America, which is wholly owned by State Street Corporation (SSC), Boston, United States of America. The ultimate group parent company SSC is subject to the supervision and regulation of the Board of Governors of the Federal Reserve System (the “Federal Reserve”) and the Federal Deposit Insurance Corporation (FDIC) and SSBT is subject to the primary supervision and regulation of the Federal Reserve and the Massachusetts Commissioner of Banks. State Street Brasil is subject to regulation by the Brazilian National Monetary Council.

Figure 01. SSBC Legal Entity Structure

3.2 Business Profile

SSBC's business strategy has been focusing primarily on (i) executing foreign exchange transactions with counterparties domiciled in and out of Brazil, (ii) issuing certificates of deposit (CDB) for the purpose of increasing the Bank's cash position to support the management of its daily activities, (iii) holding its portfolio of Brazilian Government Bonds, (iv) managing the Bank's liquidity through the use of repos and reverse repos transactions with Financial Institutions or with the Central Bank of Brazil, (v) investing in interbank deposits or similar instruments for cash management and (vi) managing its market risk exposure with listed Futures contracts.

SSBC intends to only have a single office in Brazil and will not engage in any retail banking activities such as branches, service stations, internet banking or mobile banking. Rather, the focus is on serving institutional investors who will communicate with the Bank via phone and other means of electronic communication, including electronic trading platforms.

4. GOVERNANCE AND RISK MANAGEMENT FRAMEWORK

4.1 Roles and Responsibilities

The Bank ensures there are policies, procedures and controls in place to identify, assess measure, mitigate and report key risks across its businesses. This includes routine controls and oversight for risks inherent in the normal course of operations and as unexpected issues arise.

The Bank also deploys the SSBT's corporate three lines of defense governance model:

First Line of Defense: Business and Functional Units who perform day-to-day operational and/or support activities that may give rise to risk operate as the First Line of Defense ("FLoD"). The FLoD owns the risks associated with their activities and is responsible for establishing effective internal controls to manage such risks to an acceptable level, and promoting a strong culture of risk awareness.

Second Line of Defense: Control functions independent of the FLoD, such as Enterprise Risk Management, and Compliance, operate as the Second Line of Defense ("SLoD"). The SLoD is responsible for either setting the Risk Appetite; developing policies and procedures to evaluate whether risks are contained within the appropriate limits; monitoring risk-taking; monitoring and testing compliance with laws independently of the FLoD; and providing credible review and challenge to the FLoD risk management practices.

Third Line of Defense: Corporate Audit operates as the independent Third Line of Defense ("TLoD"). The TLoD is responsible for assessing the effectiveness of the First and Second Lines of Defense as it relates to managing risk and providing reporting to the Statutory of Directors and management.

The roles and responsibilities of the governance structures pertaining to risk and capital management at SSBC are described below:

Supervisory Committee

The risk management responsibilities of the Supervisory Committee comprise:

- a. Align the Bank's risk management processes with the enterprise-wide risk management framework and Enterprise Risk Management ("ERM") function, including the strategies, policies, procedures, processes and systems, established to identify, assess, measure, monitor and manage the major risks facing the Bank;
- b. Be informed about relevant updates on policies that govern the identification, analysis, management and approval of all significant risks across the Bank, including, but not limited to, Market Risk, Liquidity Risk, Credit Risk and Operational Risk;
- c. Monitor Key Risk Indicators (KRIs), as applicable, and risk appetite measures including, but not limited to, portfolio limits;
- d. Identify, review and discuss emerging risk issues; and
- e. Monitor relevant operational risk incidents.

Risk, Compliance and Controls Forum ("RCCF")

The RCCF supports SSBC's governance and oversight of the business activities and controls, covering financial and non-financial risks. Besides, it coordinates escalation and share information with other Corporate Functional committees, as warranted. The RCCF has also local responsibilities for any themes pertaining to:

- Enterprise Risk Management;
- Compliance with legal and regulatory requirements; and
- Governance and Controls.

The RCCF's main responsibilities related to the risk management activities at SSBC are:

- Periodically review the SSBC local regulations driven policies and oversee its Risk, Compliance and Controls management framework, which includes, amongst other, policies and procedures establishing

risk, compliance and controls management governance as well as processes and systems for implementing and monitoring adherence with such policies and procedures;

- Review and discuss about enterprise risk management (ERM) processes, including the strategies, policies, procedures, processes, and systems, established to identify, assess, measure, monitor key risk metrics and manage the major risks facing the Bank, including but not limited to: credit, market, interest rate, liquidity, operational, social, environmental and climatic, and technology;
- Review and discuss effectiveness of compliance with laws and regulations, including follow-up of the findings of any examination by regulatory agencies and any auditor observations;
- Obtain updates from the SSBC's department management or equivalent regarding core compliance risk and operational risk matters, including how these risks are being monitored and how any follow ups are being tracked and reported;
- Discuss and review SSBC's internal controls and control environment including remediation efforts, correction actions, exceptions to bank's policies and procedures, and any other key risk metrics established for the purpose to oversight the business governance; and
- Discuss new products or services or new business initiatives or any other governance matter that entail increased risk or a material change to SSBC's governance, strategy and/or processes and escalate to other Committees established by SSBT.

Statutory Directors

The Bank's Statutory Directors are the CEO, the CFO/CRO, CCO, COO and the Head Trader. The Head of Risk Management and other Senior Managers provide appropriate support to the Statutory Directors.

The risk management responsibilities of the Statutory Directors comprise:

- Approve and revise when necessary, at least annually the risk management policies, strategies and limits (inclusive of systems, routines and procedures); risk appetite levels expressed in the RAS; the capital management policies and strategies; the Stress Test Program; the business continuity management policies; the liquidity contingency plan; and the capital plan (if applicable);
- Assess the risk appetite levels documented in the RAS, as well as strategies for its management, considering risks both individually and on an integrated basis;
- Oversee the CRO's conduct and performance;
- Keep records of its own deliberations and decisions;
- Ensure the Bank's adherence to the risk management policies, strategies and limits; cultivating a risk excellence culture within the institution; ensuring that personnel understand and continually monitor risks; and have adequate training on risk management policies, processes, reports, systems and models;
- Enforce corrective action to remediate any deficiencies in the risk and the capital management structures; and authorize, when necessary, exceptions to policies, procedures, limits and levels of risk appetite expressed in the Risk Appetite Statement ("RAS");
- Ensure the adequacy and sufficiency of resources for an independent, objective and effective performance of the activities related to risk and capital management;
- Ensure that the Bank's compensation structure does not encourage behaviors inconsistent with the levels of risk appetite expressed in the Risk Appetite Statement;
- Ensure that capital and liquidity levels are adequate and sufficient;
- Approve all relevant changes to the Bank's risk management policies and strategies, as well as in systems, routines and procedures;
- Conduct risk-taking activities in compliance with the Bank's risk policies and strategies;
- Ensure appropriate understanding of the risks that may affect the institution's capital and liquidity;
- Ensure awareness that there are limitations on the available information about risk and capital management;
- Ensure the Bank's compliance with the RAS;
- Understand the limitations and uncertainties related to the risk evaluation, to the models, even when developed by third parties, and to the methodologies used in risk management.
- Propose recommendations on the establishment and review of the ESG Policy;

- Assess the levels of adherence of the implemented actions to the ESG Policy and, where necessary, make recommendations for improvement;
- Ensure the Bank's adherence to the ESG Policy, RAS and other Risk Policies, and promote internally its dissemination and the actions aimed at its effectiveness;
- Ensure the compatibility and integration of the ESG Policy with the other policies established by the Bank, including, where applicable, credit, human resources management, risk management, capital management and compliance policies; and
- Ensure that the compensation structure adopted by the institution does not encourage behavior incompatible with the ESG Policy.

Chief Risk Officer (CRO)

The Chief Risk Officer is responsible for the Bank's risk management functions as second line of defense, including management of credit risk, market risk, liquidity risk, operational and other relevant risks, as well as for providing independent oversight of all activities in a manner that meets local regulatory requirements.

The responsibilities of the SSBC Chief Risk Officer as they pertain to risk management comprise:

- Ensure risk systems and infrastructure are established to ensure the proper capture, measurement, and reporting of all risks in a rigorous and sustainable manner;
- Ensure risk management policies, procedures and systems and infrastructure for the Bank are consistent with, and integrated into where necessary, the global operating model for SSBT;
- Oversee the development, implementation and performance of the risk management structure, including its improvements;
- Review and implement policies, processes, reports, systems and models consistent with the Bank's RAS and strategic goals;
- Provide support to and participate in the strategic decision-making processes related to risk management and, where applicable, to capital management, as an assistance to the Statutory Directors;
- Ensure that personnel understands and continually monitors risks; and have adequate training on risk management policies, processes, reports, systems and models;
- Provide support and participate in the decision-making process related to the establishment and review of the ESG Policy, assisting the Statutory Directors;
- Implement actions aimed at the effectiveness of the ESG Risk Policy;
- Monitor and evaluate the implemented actions in the RCCF;
- Improve the implemented actions, where any deficiencies are identified; and
- Adequately and reliably disclose the Bank's ESG information as per the applicable regulation.
- Participate in the approval process of proposals for the reclassification of instruments between the trading and banking portfolios, when applicable; and
- Maintain responsibility for compliance with the requirements of CMN Resolution 4,677/2018, which establishes maximum exposure limits per client and maximum limit of concentrated exposures.

Director of Capital Management

The Director of Capital Management is responsible for the Bank's capital management activities. The responsibilities of the SSBC Director of Capital Management comprise:

- Overseeing the development, implementation and performance of the capital management structure, including its improvements;
- Responsibility for the processes and controls relative to the calculation of the RWA, Total Capital, Tier I Capital and Core Capital, and for the maintenance of the Additional Core Capital required; and
- Responsibility for the processes and controls relative to the calculation of the Leverage Ratio and for the maintenance of minimum regulatory requirements.

4.2 Risk Profile and Strategy

In the normal course of the Bank's business activities, the Bank is exposed to a variety of risks, some inherent in the financial services industry, others more specific to business activities. The Bank's risk management is based on the following major goals:

- i. A culture of risk awareness that extends across all business activities;
- ii. The identification, classification and quantification of the Bank's material risks;
- iii. The establishment of a risk appetite and associated limits and policies, and compliance with these limits and policies;
- iv. The establishment of a risk management structure at the "top of the house" that enables the control and coordination of risk-taking across the business lines;
- v. The implementation of stress testing practices and a dynamic risk assessment capability;
- vi. A direct link between risk and strategic-decision making processes and incentive compensation practices; and
- vii. The overall flexibility to adapt to the ever-changing business and market conditions.

The Bank's RAS document outlines the quantitative limits and qualitative goals that define risk appetite, as well as the responsibilities for measuring and monitoring risk against limits, and for reporting, escalating, approving and addressing exceptions.

4.3 Risk Culture and Dissemination

SSBC maintains a risk culture that is effectively disseminated among all its employees, through various initiatives, such as:

- Adherence to the Organization's code of conduct when new employees join;
- The "Speak Up/Listen Up" initiative encourages employees as well as business partners to report complaints, grievances, including any observed instances of corruption, misconduct, fraud, and potential violations of policy through "the Speak Up line", a confidential reporting hotline that promptly routes issues to the Conduct Office and in certain cases, to the lead director of the Board;
- Maintenance of the corporate intranet with the Risk Policies and various manuals made available to all employees, according to their activities and responsibilities. Additionally, with each new Risk Policy, or in its periodic reviews, employees are promptly informed about its availability on the intranet by email;
- Weekly discussions of subjects related to the Bank's risks with the presence of most of the employees;
- Forums and Committees with the participation of several employees in order to share relevant information on risk management;
- Daily reports sent to various relevant parties;
- Periodic and mandatory training on the management of the various risks incurred by the Bank, made available on specific platforms;
- Other training and workshops provided to Bank employees;
- Governance established with clear roles and responsibilities, including remit and escalation process.

4.4 Relevant Risk Types

Giving its business strategy, the Bank's current risk profile is organized into six main risk categories, which serve as the organizing principle for the quantitative and qualitative limit framework that has been established to articulate the risk appetite across risk types and business activities.

- Credit Risk;
- Market Risk and IRRBB;
- Operational Risk;
- Liquidity Risk;
- Technology Risk; and
- Social, Environmental and Climate Risks.

I. Credit Risk

SSBC defines Credit Risk as the risk of financial loss when a borrower or debtor, collectively referred to as a counterparty, is unable or unwilling to repay loan amounts or settle within agreed contractual terms. Credit risk appetite levels are described in the RAS document and in the Credit Risk Policy, and are also daily reported in the limit consumption reports. The Credit Risk Policy establishes the standards and requirements regarding the governance and management, evaluation, mitigation, monitoring and reporting of the Bank's exposures.

For the measurement, monitoring and control of SSBC's credit risk, an independent risk assessment is considered, which includes the risk classification and associated limit per counterparty.

II. Market Risk and IRRBB

The management of the market risk and the interest rate risk in the banking book adopts global guidelines in conjunction with the regulatory requirements set forth in Resolution CMN 4,557/2017, and is supported by SSBT's global tools and oversight. The market risk management structure is based on the Market Risk Policy, which determines the responsibilities, strategies, processes and methodologies used in the identification, evaluation, monitoring, controlling and mitigation of the market risk, in an integrated manner and in order to provide adequate support to the Bank's Statutory Directors.

The IRRBB is used to measure the loss in the financial intermediation of the instruments that compose the banking book in an interest rate shock scenario.

III. Operational Risk

SSBC recognizes that operational risk is intrinsic to its business and cannot be fully mitigated. The Bank, therefore, seeks to manage its operational risks taking into account its strategic, financial and operational objectives, within the risk appetite levels established in the RAS. The Bank manages its operational risk by identifying, capturing and analyzing data related to operational risk, using information from events periodically reported by the different areas of the Bank for understanding, definition of action plans, monitoring and reporting to the Statutory Directors.

IV. Liquidity Risk

SSBC defines liquidity risk as the possibility of the institution not being able to efficiently honor its expected and unexpected, current and future obligations, including those arising from the binding of guarantees, without affecting its daily operations and without incurring significant losses; and the possibility of the institution not being able to negotiate a position at market price, due to its large size in relation to the volume normally transacted or due to some discontinuity in the market. At SSBC, controls are in place to ensure that liquidity risk is managed in line with the Bank's RAS and above minimum regulatory requirements, as well as to allow senior management to adequately monitor and assess liquidity risk. Liquidity risk controls include a well-defined Governance framework as well as policies, guidelines, limits and escalation process. The ERM Brazil area has periodic meetings with the local and global Treasuries to discuss relevant topics and receive support and guidance when necessary.

V. Technology Risk

SSBC manages information technology with the intention to operate within its regulatory and contractual obligations, fiduciary and other legal duties, policies and standards, strategic and operational objectives as well as to meet client commitments. SSBC defines technology risk as the inability to materially achieve strategic, financial, and operational objectives due to issues arising from the use, ownership, operation, involvement, influence and adoption of information technology. This includes technology products and services provided by third parties, IT teams or non IT personnel.

VI. Social, Environmental and Climate Risks

The Bank's commitment to social and environmental responsibility and our belief in giving back to the communities in which we live and work are critical to our long-term success. We recognize that sustainable growth comes from operating with absolute integrity and in a way that respects our shareholders, clients, employees, our communities and the environment. We are committed to the principles of sound governance and to helping our customers succeed. We are dedicated to ensuring a global and inclusive workplace where employees feel valued and engaged. We believe we have a responsibility to enrich our communities, and to be a leader in environmental sustainability, both in the way we carry out our operations and in the products and services we offer.

The ERM Brazil department is responsible for social, environmental and climate risks reporting at SSBC through the use of different approaches that enable the identification of risk associated to sectors, measurement and monitoring of the Bank's exposure by region and sector, and preparation of questionnaires with questions related to social, environmental and climate aspects sent out to the Bank's onshore counterparties, relevant suppliers and outsourced service providers to have a better understanding on how they manage these risks and to discuss in the RCCF any potentially material risks to SSBC based on the answers received.

4.5 Risk Reporting

The ERM Brazil department periodically produces and reports to the business areas, responsible managers and the Bank's Statutory Directors a set of reports with relevant information about the risks incurred as part of the established corporate governance and following the regulatory requirements issued by the CBB. The most relevant reports are:

- Market risk, credit risk and liquidity risk limits
- Bank's position, market risk metrics (DV01, FX exposure etc) and Stress Testing
- VaR Backtesting
- Intraday FX exposure
- 90 days cash flow projections (normal and stressed scenarios)
- Operational risk incidents
- Credit risk exposure by counterparty
- Exposure to Social, Environmental and Climate risks
- Country Risk Exposure
- Daily RWA

In addition to that, ERM Brazil department produces and submits to the CBB the following regulatory reports: DDR, DRM and DRL.

4.6 Stress Testing

In order to assess the Bank's ability to sustain losses and test the resilience of its capital in extreme economic and market conditions, the Bank conducts stress tests.

The Bank's Stress Test Program is based on the sensitivity analysis methodology, which simulates severe economic and market conditions on main variables. The test considers the following risks, which are considered relevant:

- Liquidity;
- Market; and
- Credit Risk.

Its results are reported to the Statutory Directors and incorporated in the capital analysis process and in the Risk Appetite Statement review.

4.7 Risk Mitigation

The Bank has a risk management structure independent of the Bank's business areas, which establishes limits and risk mitigation mechanisms, proposes metrics that are part of the Bank's RAS and develops Policies, guidelines, processes and procedures for adequate risk measurement, monitoring and reporting.

The Bank's risk governance establishes appropriate discussion and approval forums for market, IRRBB, liquidity, credit, operational and social, environmental and climate risks limits, among others, the guidelines and policies to be complied with, the processes and procedures for evaluation, measurement, monitoring and reporting, considering scenarios under normal and stress conditions.

For the credit risk, the limits are defined by counterparty and reflect the risk appetite of each counterparty, taking into account mitigating factors, for example, collateral received in operations carried out. Monitoring is done daily and the reports are sent out to the business areas and to the Statutory Directors.

With regards to the market risk, including IRRBB, the mitigation strategies take into account the risk appetite levels defined in the RAS, which consider, among others, the mismatch of exposures by tenor and by risk factors.

The operational risk framework has a structure for capturing and reporting incidents that is widespread throughout the organization. As a way of mitigating operational risk, very detailed action plans are prepared, with defined deadlines and responsible areas, and a robust periodic monitoring timeframe. In addition, the monitoring of operational incidents is carried out by the RCCF, which can deliberate on additional actions or determine the status of each action plan.

The Bank's ESG structure and governance, as well as that related to other risks, includes the identification, measurement, monitoring, definition of limits in the RAS and reporting, as a way of mitigating social, environmental and climate risks. Although incipient, the Bank's social, environmental and climate risks management structure established limits and procedures in order to mitigate these risks and fit within acceptable levels according to the Bank's RAS.

4.8 Open Data

The information about the risk and capital management structures are disclosed in JSON format at:

<https://www.statestreet.com/content/dam/stt/web/disclosures-and-disclaimers/br/json/ova/2023.json>

<https://www.statestreet.com/content/dam/stt/web/disclosures-and-disclaimers/br/json/catalogo.json>

5. CAPITAL MANAGEMENT

SSBC's capital management framework is based on clearly defined policies and strategies that formalize systems, routines and processes that enable the assessment of capital adequacy and that include a capital plan and management reports sent out to senior management.

5.1 Total Capital (TC)

The Bank's core capital, additional capital and total capital for the date as of this document are:

Figure 02. Total Capital

Tier I Capital	395,318
Core Capital	395,318
Additional Capital (AC)	-
Tier II Capital	-
Subordinated Debt	-
Exclusions	-
Total Capital (TC)	395,318
Total Capital Minimum Requirement	8,549
Total Capital Surplus/Deficit	386,769
Total Capital Surplus/Deficit (including IRRBB)	376,157
Total Capital Surplus/Deficit (including IRRBB + AC)	373,486

5.2 Risk Weighted Assets (RWA) and Regulatory Capital Indicators

For the purpose of calculating the minimum capital requirements and the additional capital mentioned respectively in Arts. 4 to 6 and 8 of Resolution CMN 4,958/2021, the RWA amount is calculated as the sum of the following components:

- **RWA_{CPAD}**, relative to credit risk exposures subject to the calculation of capital requirement under the standardized approach;
- **RWA_{MPAD}**, relative to market risk exposures subject to the calculation of capital requirement under the standardized approach. RWA_{MPAD} is the sum of the following components:
 - RWA_{JUR1}, relative to exposures subject to a variation in fixed interest rates denominated in real, for which capital requirement is calculated using the standardized approach;
 - RWA_{JUR2}, relative to exposures subject to rate variations in foreign currency coupons, for which capital requirement is calculated using the standardized approach;
 - RWA_{JUR3}, relative to exposures subject to rate variations in price indices coupons, for which capital requirement is calculated using the standardized approach;
 - RWA_{JUR4}, relative to exposures subject to rate variations in interest rates coupons, for which capital requirement is calculated using the standardized approach;
 - RWA_{ACS}, relative to exposures subject to variations in the price of shares, for which capital requirement is calculated using the standardized approach;
 - RWA_{COM}, relative to exposures subject to variations in the prices of commodities, for which capital requirement is calculated using the standardized approach; and
 - RWA_{CAM}, relative to exposures to gold, in foreign currency and in assets subject to foreign exchange variations, for which capital requirement is calculated using the standardized approach.
 - RWA_{CVA}, relative to exposures to the risk of variation in the value of derivative instruments as a result of variation in the credit quality of the counterparty.
- **RWA_{OPAD}**, relative to the calculation of required capital for operational risk under the standardized approach.

The institution must also maintain sufficient Capital to cover the risk of interest rate fluctuations for instruments classified in the banking book (IRRBB).

The Bank's total RWA, its breakdown (market, credit, operational and IRRBB) and the regulatory capital indicators are presented below:

Figure 03. Total RWA

Indicators (in BRL thousands)	Dec-23
Credit Risk RWA_{CPAD}	19,443
By RW	
RW 0%	
RW 1%	915
RW 20%	1,217
RW 35%	
RW 50%	7,920
RW 75%	
RW 85%	
RW 100%	5,780
RW 150%	
RW 250%	3,610
RW 300%	
RW 909,09%	
Market Risk RWA_{MPAD}	48,683
Interest Rate	43,133
Interest Fixed Rate in BRL (RWA_{JUR1})	8,602
Foreign Exchange Coupons (RWA_{JUR2})	34,531
Price Index Coupons (RWA_{JUR3})	-
Interest Rate Coupos (RWA_{JUR4})	
Commodities (RWA_{COM})	-
Exposure to Gold and Foreign Exchange Currency (RWA_{CAM})	5,550
Variation in the value of derivative instruments as a result of variation in the credit quality of the counterparty (RWA_{CVA})	0
Operational Risk	38,734
Risk Weighted Assets (RWA)	106,860
Total Capital Minimum Requirement	8,549
Interest Rate Risk in the Banking Book ($IRRBB$)	10,612

Figure 04 Regulatory Capital Indicators

	Dec-23
Core Capital Index	369.94%
Tier I Index	369.94%
Total Capital Index (Basel Index)	369.94%
Total Capital Index + IRRBB	165.05%
Total Capital Index + IRRBB + AC	144.86%

5.3 Regulatory Capital Planning

The Bank's Capital Plan establishes the main aspects of the capital management structure regarding the expectations of Total Capital and Risk Weighted Assets, in accordance with the requirements described in Resolution CMN 4.557/2017 and in other related regulatory documents. It prescribes capital targets, projections and the Bank's main sources of capital.

Additionally, the following aspects are considered in the Plan: threats and opportunities related to the economic and business environment; projections of values of assets, liabilities and off-balance sheet exposures, as well as of incomes and expenses; targets for growth or market participation; the dividend policy; and the RAS.

At SSBC, the ERM Brazil department is responsible for preparing this Plan, with support from the Finance teams. This document applies to the entire Bank and includes all activities that make up the trading and banking portfolios, whether or not on-balance sheet exposures, in accordance with managerial and regulatory requirements. This Plan meets the regulatory requirements of the CBB.

The capital projections elaborated both in a BAU scenario and under stressed conditions show that the Bank has sufficient capital to meet the minimum requirements of core capital, Tier I capital and total capital, including all capital buffers and the IRRBB coverage for the next years.

6. INFORMATION INCLUSION OR CORRECTION

There was no inclusion or correction of information in the period.