



REGULATORY DISCLOSURE

2025-03-31



CORPORATE PROFILE

Bridgewater Bank (the Bank) is a Schedule 1 Bank under the *Bank Act* (Canada) and is regulated by the Office of the Superintendent of Financial Institutions Canada (OSFI). The Bank is owned by the Alberta Motor Association (AMA), the largest membership service organization in Alberta.

Specializing in residential mortgages and deposit products through a select network of brokers, the Bank serves customers across Canada. The Bank participates in the National Housing Act (NHA) mortgage-backed securities (MBS) and Canada Mortgage Bond (CMB) programs.

SCOPE OF DISCLOSURE

This document is prepared in accordance with OSFI's *Pillar 3 Disclosure Guideline for Small and Medium-Sized Deposit-Taking Institutions (SMSBs) Capital and Liquidity Requirements* for a Category II SMSB. OSFI's requirements are based on the Basel Committee of Banking Supervision (BCBS) Pillar 3 disclosure requirements. Additional disclosure requirements outlined in OSFI Guideline *B-20 Residential Mortgage Underwriting Practices and Procedures* have been incorporated in this document.

Unless stated otherwise, all figures are in thousands of dollars except for percentages. The information contained in this document has not been audited.

Additional information can be found at OSFI's financial data website:

<https://www.osfi-bsif.gc.ca/en/data-forms/financial-data>

CAPITAL MANAGEMENT

The Bank's Capital Management Policy governs the Bank's capital adequacy with respect to regulatory requirements, risk appetite and strategic objectives. The Bank's Internal Capital Adequacy Assessment Process (ICAAP) assesses the Bank's capital plan under stressed conditions to ensure appropriate capital adequacy of the Bank. The Bank has various capital policies, procedures, and controls which it utilizes to achieve its goals and objectives. The Capital Management Policy is reviewed annually by the Board.

The Bank manages its capital under guidelines established by OSFI which are based on the BCBS framework. The regulatory capital guidelines measure capital in relation to credit, market and operational risks. The Bank uses the Standardized Approach for the measurement of credit risk and the Simplified Standardized Approach for the measurement of operational risk.

Under OSFI's requirements, capital is allocated to two tiers: Tier 1 and Tier 2. Tier 1 capital is further broken into Common Equity Tier 1 (CET1) and Additional Tier 1 capital. CET1 comprises the highest quality of capital and consists primarily of common shares and retained earnings less deductions as prescribed by OSFI. Included in the Bank's Tier 2 capital is eligible allowances for credit losses.

Annex 3 provides key metrics related to risk-based capital ratios and the leverage ratio.

RISK MANAGEMENT

Risk management is an essential component of the Bank's operations. The Bank invests significantly in risk management practices and resources, and this investment contributes directly to the Bank's profitability.

The Enterprise Risk Management (ERM) Policy governs the risks within the Bank. The Chief Risk Officer (CRO) establishes this policy, and it is approved for use in the Bank by the Board of Governors of AMA and the Board of Directors. The ERM Policy outlines the approach and the strategy of the ERM Program and sets out roles and responsibilities.

The ERM Framework explains the methodology for integrating ERM into all levels of the Bank. The Framework supports the ERM Policy and explains the risk approach. It also establishes the context in identifying, analyzing, evaluating, and monitoring risk. The ERM Framework is embedded within the Bank's overall strategic and operational policies and procedures.

The Bank's business strategies and operations expose us to a wide range of risks that could adversely affect operations and financial condition, which in turn can significantly affect the Bank's profitability and growth objectives. When evaluating risks, management makes decisions about which risks it will accept, mitigate and avoid. These decisions are guided by the Bank's Risk Appetite Statement. The types of risk to which the Bank is subject to include: strategic, credit, interest rate, liquidity, operational, regulatory and reputation.

RISK MANAGEMENT GOVERNANCE STRUCTURE

The Bank takes a prudent approach to managing risk inherent in the business segments within which it operates and ensures that it understands and limits the overall amount of risk in the Bank. It achieves that by establishing a formal Risk Appetite Statement. This statement is reviewed and adjusted annually.

The Board has overall responsibility for the establishment and oversight of the Bank's risk appetite. The Risk Appetite Statement sets out the overall risk capacity and risk appetite for the Bank, establishes measures and limits on risks, and sets out the stress testing program. The Board reviews and approves key policies to enable effective monitoring of the Bank's significant risks. At least quarterly, a report on the key risks is presented to the Board and its committees for review and assessment.

The Bank employs the industry standard three lines of defence model which include risk management control functions, oversight committees and independent assurance.

ECONOMIC RISK FACTORS

The Bank's portfolio is exposed to economic factors that could deteriorate the credit quality of the portfolio. In addition to continually assessing the performance of the portfolio, the Bank periodically performs stress testing for various economic downturn scenarios to ensure the Bank holds sufficient capital for adverse events. The Bank mitigates the impact of an economic slowdown to its business with prudent underwriting practices and risk management. The Bank's Expected Credit Loss model considers various economic conditions in the establishment of loan loss allowances.

CREDIT RISK

Credit risk is the risk of loss resulting from the failure of a counterparty to honour its financial obligation.

Credit risk management is a component of the Risk Appetite Statement approved by the Board and the Risk Committee. The Asset and Liability Committee (ALCO) provides financial oversight over credit risk and ensures the Bank meets mortgage insurers' compliance standards. The ALCO reviews arrears and underwriting post assessment reporting, which is also communicated to the Risk Committee. Credit risk management over day-to-day operations is provided by the Credit Management Committee, including oversight of the geographic concentration. The lines of business are responsible for management of the Bank's credit risks in accordance with approved policies.

Funded mortgages comply with the product and underwriting policies of the Bank and the mortgage insurers. Mortgage security is obtained on all funded mortgages and values are supported with real estate appraisals to mitigate the risk of loss. The Bank maintains an allowance for expected credit losses.

The Bank is exposed to credit risk through contracts with third parties for mortgage insurance and derivatives utilized to manage interest rate risk. This counterparty credit risk is mitigated by contracting with reputable organizations that have investment-grade credit ratings and by utilizing a number of different organizations, where possible, to minimize the impact of the risk of any one counterparty defaulting on its contractual obligations.

COUNTERPARTY CREDIT RISK AND CREDIT VALUATION ADJUSTMENT

Counterparty credit risk (CCR) is defined as the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. It represents the probability of financial loss when a transaction counterparty fails to fulfill its contractual obligations. In the context of derivatives, CCR is the possibility that the counterparty may default before the final settlement. Overall, it is the risk that one party in a financial contract will not meet its obligations, leading to potential financial loss for the other party. The Bank's CCR exposure comes from the Treasury's execution of derivative hedge transactions with other financial institutions.

Credit valuation adjustment (CVA) is an adjustment made to a derivative's price to compensate a bank for taking on the credit risk of a counterparty during the life of the transaction. It represents the cost of hedging the unique counterparty credit risk of a derivative instruments or portfolio. CVA is the market value of CCR, accounting for the possibility of counterparty default. The Bank records CVA on derivative assets to reflect the credit quality of counterparties. The Bank monitors these exposures regularly, with oversight by the ALCO.

The Bank calculates its CVA using the reduced basic approach credit valuation adjustment (BA-CVA) and considers legally enforceable master netting agreements that mitigate credit exposure to each counterparty in determining CVAs, which may be adjusted due to changes in the fair values of its interest rate swaps, collateral, and creditworthiness of the counterparty.

The following table provides the components used for the computation of capital requirements under the reduced BA-CVA for CVA risk:

31-Mar-25		a	b
		Components	Capital requirements under BA-CVA
1	Aggregation of systematic components of CVA risk	\$ 456	
2	Aggregation of idiosyncratic components of CVA risk	\$ 344	
3	Total		\$ 244

INTEREST RATE RISK IN THE BANKING BOOK

Interest rate risk is the risk of loss from future changes in the prevailing level of interest rates. The Bank is exposed to interest rate risk as a result of a difference or gap between the maturity or repricing date of interest rate-sensitive assets and liabilities, as well as on unfunded mortgage commitments. Certain economic hedges are used to manage the interest rate risk, including bond shorts and interest rate swaps. The Bank uses two interest rate risk sensitivity models to measure the impact of changing interest rates on its equity position and net interest income for the 12 months following the measurement date. The objective is to measure the interest rate risk within Board approved guidelines.

The Bank's interest rate risk management policies are approved by the Board and the ALCO. The ALCO establishes and recommends to the Board interest rate risk tolerances, which the Board approves. The ALCO oversees stress testing of interest rate risk and the monitoring of risk mitigation strategies. The finance department is responsible for managing the Bank's interest rate risk positions in accordance with approved policies and assesses the impact of shock events on the Bank's net interest income and equity at risk on monthly basis.

ALCO manages the interest rate sensitivity on equity within the Board authorized limits. Based on the Bank's interest rate positions, an immediate and sustained change in interest rates would impact equity as follows:

	31-Mar-25	31-Dec-24	31-Mar-24
Increase of 100 basis points	\$ (2,805)	\$ (2,982)	\$ 1,705
Decrease of 100 basis points	\$ 2,859	\$ 3,005	\$ (2,514)

LIQUIDITY RISK

Liquidity risk is the risk that cash demands or funding obligations cannot be met as they come due. Liquidity risk also includes the risk of not being able to liquidate assets in a timely manner at a reasonable price. The Bank is exposed to liquidity risk due to the mismatching of the duration of assets, particularly the maturity of mortgages, and liabilities, particularly term deposits. The Bank is exposed to liquidity risk when the total value of its outstanding unfunded mortgage and repurchase commitments, along with committed but unpaid trade obligations, exceeds its available cash reserves or its ability to secure additional deposits.

The Bank's liquidity and funding policies are approved by the Board and the ALCO. The ALCO establishes and recommends to the Board liquidity risk tolerances, which the Board approves. The Bank's policies address the minimum level of liquid assets, the composition of liquid assets, the stress tests to be completed and the frequency of assessments. The ALCO reviews the composition and terms of assets and liabilities, reviews liquidity and funding policies, and regularly monitors compliance with these policies. The ALCO also oversees stress testing of liquidity and funding risk and the monitoring of the Bank's contingency funding plan. The finance department is responsible for managing the Bank's liquidity and funding positions in accordance with approved policies and assesses the impact of market events on liquidity requirements on an ongoing basis.

The Bank evaluates total liquid assets against funding requirements and stress test scenarios to ensure liquid assets are available to cover current needs and during periods of market stress. Quarterly, standard stress tests are performed in addition to scenarios dependent upon the risks existing at the time testing is performed. The results are reported to the ALCO and the Board. The Bank's liquid assets are made up of cash with large institutions and unencumbered, high quality liquid assets.

Liquidity is managed by selling or securitizing funded mortgages to investors and via the management of the amount and term of outstanding deposits. The Bank monitors its exposure to funding sources and sets limits to reduce the Bank's reliance on any one funding source. Investors include whole loan investors, MBS investors and the Canadian Housing Trust (CHT) through the CMB program. As the Bank is not rated by a recognized credit agency, a rated intermediary is required to act on its behalf in dealings with the CHT. The Bank continues to maintain liquidity through issuing MBS and raising deposits. Although the Bank has deposits maturing within one year, liquidity is expected to be maintained through continued mortgage sales or securitizations, renewal of a portion of these deposits and raising new deposits.

The Bank also manages its liquidity to comply with OSFI's Liquidity Adequacy Requirements (LAR). The LAR provides guidance on liquidity measures, the liquidity coverage ratio (LCR) and the net cumulative cash flow (NCCF). The LCR is a BCBS designed liquidity measure that requires the Bank to maintain a sufficient stock of high-quality liquid assets to cover a minimum of 30 days of net cash outflows in a stressed environment. The OSFI-designed NCCF measures funding mismatches over and up to a 12-month time horizon.

OPERATIONAL RISK

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events and includes legal risk. Proactive management of operational risk is the key objective of the Bank as outlined in the Bank's Operational Risk Management Framework (ORMF). The ORMF establishes and tests operational processes to ensure appropriate controls are in place and are effective in the prevention, detection, and mitigation of operational risk exposure.

The ORMF utilizes the three lines of defense approach to provide for effective risk management and control objectives. Each business unit is required to identify and assess its operational risks and ensure that they are managed effectively. This includes the establishment of procedures and guidelines, identification of risks, incident reporting, and corrective measures. The second line of defense provides oversight and review of the business units. The third line of defence provides independent review of first- and second-line activities.

B-20 RESIDENTIAL MORTGAGE DISCLOSURE

Insured or high-ratio mortgages are mortgages with less than 20% down payment on the lesser value of either the purchase price of a home or the appraised value. Below that threshold, the Bank Act requires that mortgage default insurance must be obtained for a fee by a mortgage loan insurance provider. Uninsured or conventional mortgages are mortgage loans that do not exceed 80% of the lesser value of either the purchase price of a home or the appraised value.

Geographic breakdown of single-family residential mortgages

	31-Mar-25		31-Dec-24		31-Mar-24	
Insured mortgages						
British Columbia	\$ 22,724	1.2%	\$ 23,445	1.2%	\$ 28,198	1.3%
Alberta	132,674	7.0%	137,271	7.2%	154,535	7.4%
Saskatchewan	20,382	1.1%	21,111	1.1%	23,660	1.1%
Ontario	53,396	2.8%	55,660	2.9%	63,966	3.0%
Atlantic provinces	62,096	3.3%	64,914	3.4%	73,062	3.5%
Other	6,630	0.3%	6,722	0.4%	7,746	0.4%
Total	\$ 297,902	15.7%	\$ 309,123	16.2%	\$ 351,167	16.7%
Uninsured mortgages						
British Columbia	\$ 317,623	16.6%	\$ 320,875	16.8%	\$ 343,425	16.3%
Alberta	428,836	22.5%	410,906	21.5%	419,021	19.9%
Saskatchewan	54,900	2.9%	53,516	2.8%	56,335	2.7%
Ontario	776,048	40.7%	779,742	40.9%	899,197	42.8%
Atlantic provinces	4,157	0.2%	4,190	0.2%	2,711	0.1%
Other	28,359	1.4%	28,729	1.6%	29,238	1.5%
Total	\$ 1,609,923	84.3%	\$ 1,597,958	83.8%	\$ 1,749,927	83.3%
Total portfolio	\$ 1,907,825	100.0%	\$ 1,907,081	100.0%	\$ 2,101,094	100.0%

Original loan amortization of single-family residential mortgages

	31-Mar-25		31-Dec-24		31-Mar-24	
25 years or less	\$	543,530 28.5%	\$	552,856 29.0%	\$	611,632 29.1%
25-30 years		995,542 52.2%		976,167 51.2%		1,122,023 53.4%
30-35 years		368,753 19.3%		378,058 19.8%		367,439 17.5%
Total	\$	1,907,825 100.0%	\$	1,907,081 100.0%	\$	2,101,094 100.0%

LTV for uninsured single-family residential loans originated in the quarter

	31-Mar-25	31-Dec-24	31-Mar-24
British Columbia	65.6%	67.4%	68.5%
Alberta	73.6%	72.9%	72.1%
Saskatchewan	71.7%	75.5%	69.8%
Ontario	68.6%	64.8%	68.4%
Other	68.6%	72.8%	73.0%
Total	70.1%	69.1%	69.4%

ANNEX 1 – CAPITAL DISCLOSURES

Modified CC1: Composition of Regulatory Capital				
	31-Mar-25	31-Dec-24	31-Mar-24	
Common Equity Tier 1 capital: instruments and reserves				
1	Directly issued qualifying common share capital plus related stock surplus	\$ 138,000	\$ 138,000	\$ 138,000
2	Retained earnings	20,163	16,674	8,839
6	Common Equity Tier 1 capital before regulatory adjustments	158,163	154,674	146,839
Common Equity Tier 1 capital: regulatory adjustments				
28	Total regulatory adjustments to Common Equity Tier 1	(115)	(140)	(303)
29	Common Equity Tier 1 capital (CET1)	\$ 158,048	\$ 154,534	\$ 146,536
Additional Tier 1 capital: instruments				
36	Additional Tier 1 capital before regulatory adjustments	-	-	-
Additional Tier 1 capital: regulatory adjustments				
43	Total regulatory adjustments to Additional Tier 1	-	-	-
44	Additional Tier 1 capital (AT1)	\$ -	\$ -	\$ -
45	Tier 1 capital (T1 = CET1 + AT1)	\$ 158,048	\$ 154,534	\$ 146,536
Tier 2 capital: instruments and provisions				
50	Collective allowances	7,972	7,875	7,858
51	Tier 2 capital before regulatory adjustments	7,972	7,875	7,858
Tier 2 capital: regulatory adjustments				
57	Total regulatory adjustments to Tier 2 capital	-	-	-
58	Tier 2 capital (T2)	\$ 7,972	\$ 7,875	\$ 7,858
59	Total capital (TC = T1 + T2)	\$ 166,020	\$ 162,409	\$ 154,394
60	Total risk-weighted assets	\$ 710,614	\$ 701,594	\$ 736,374
Capital ratios				
61	Common Equity Tier 1 (as a percentage of risk-weighted assets)	22.2%	22.0%	19.9%
62	Tier 1 (as a percentage of risk-weighted assets)	22.2%	22.0%	19.9%
63	Total capital (as a percentage of risk-weighted assets)	23.4%	23.1%	21.0%
OSFI target				
69	Common Equity Tier 1 target ratio	7.0%	7.0%	7.0%
70	Tier 1 capital target ratio	8.5%	8.5%	8.5%
71	Total capital target ratio	10.5%	10.5%	10.5%

ANNEX 2 – LEVERAGE RATIO DISCLOSURES

LR2: Leverage Ratio			
	31-Mar-25	31-Dec-24	31-Mar-24
On-balance sheet exposures			
1 On-balance sheet items (excluding derivatives, SFTs and grandfathered securitization exposures but including collateral)	\$ 2,131,323	\$ 2,147,867	\$ 2,268,669
4 (Asset amounts deducted in determining Tier 1 capital)	(115)	(140)	(303)
5 Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 and 4)	\$ 2,131,208	\$ 2,147,727	\$ 2,268,366
Derivative exposures			
6 Replacement cost associated with all derivative transactions	2,065	2,857	-
7 Add-on amounts for potential future exposure associated with all derivative transactions	1,259	1,259	-
11 Total derivative exposures (sum of lines 6 to 10)	\$ 3,984	\$ 4,116	\$ -
Other off-balance sheet exposures			
17 Off-balance sheet exposure at gross notional amount	15,422	11,579	19,136
18 (Adjustments for conversion to credit equivalent amounts)	(9,253)	(6,947)	(11,482)
19 Off-balance sheet items (sum of lines 17 and 18)	\$ 6,169	\$ 4,632	\$ 7,654
Capital and Total Exposures			
20 Tier 1 capital	158,048	154,534	146,536
21 Total exposures (sum of lines 5, 11 and 19)	2,141,361	2,156,475	2,276,020
Leverage ratios			
22 Basel III leverage ratio	7.4%	7.2%	6.4%

SFTs - Securities Financing Transactions

ANNEX 3 – KEY METRICS DISCLOSURES

KM1: Key Metrics

	31-Mar-25	31-Dec-24	30-Sep-24	30-Jun-24	31-Mar-24
Available capital (amounts)					
1 Common Equity Tier 1 (CET1)	\$ 158,048	\$ 154,534	\$ 151,588	\$ 148,744	\$ 146,536
2 Tier 1	158,048	154,534	151,588	148,744	146,536
3 Total capital	166,020	162,409	159,596	156,887	154,394
Risk-weighted assets (amounts)					
4 Total risk-weighted assets (RWA)	\$ 710,614	\$ 701,594	\$ 709,383	\$ 717,428	\$ 736,374
4a Total risk-weighted assets (pre-floor)	710,614	701,594	709,383	717,428	736,374
Risk-based capital ratios as a percentage of RWA					
5 CET1 ratio (%)	22.2%	22.0%	21.4%	20.7%	19.9%
5a CET1 ratio (%) (pre-floor ratio)	22.2%	22.0%	21.4%	20.7%	19.9%
6 Tier 1 ratio (%)	22.2%	22.0%	21.4%	20.7%	19.9%
6a Tier 1 ratio (%) (pre-floor ratio)	22.2%	22.0%	21.4%	20.7%	19.9%
7 Total capital ratio (%)	23.4%	23.1%	22.5%	21.9%	21.0%
7a Total capital ratio (%) (pre-floor ratio)	23.4%	23.1%	22.5%	21.9%	21.0%
Basel III Leverage ratio					
13 Total Basel III leverage ratio exposure measure	\$2,141,361	\$2,156,475	\$ 2,172,616	\$ 2,213,393	\$2,276,020
14 Basel III leverage ratio (row 2 / row 13)	7.4%	7.2%	7.0%	6.7%	6.4%