Ministry of Foreign Affairs

Historical view: CEB Capital increase (23-0001156)

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Key data

Activity basics

Type	Standard
Short name	CEB Capital increase
Contract party	Raad Van Europa Ontwikkelingsbank Paris Paris (30014375)
ODA	Yes
Amount EUR	154269000
Start date	01-07-2023
End date	01-07-2026
Full name	NL contribution to Council of Europe Development Bank (CEB) capital increase.
Summary	At the CEB's Administrative Council on 3 November 2022, it was decided that the capital increase will total EUR4.25 billion of which EUR1.2 billion will be paid in (28.24%). Half of the capital increase concerns a paid-in capital buffer (funded guarantee) to cover the risk of operations in Ukraine. The paid-in EUR 600 million from shareholders will guarantee a total of EUR 1.571 million of operations in Ukraine. For the Netherlands, the total amounts to a total capital increase of EUR 154.3 million, of which EUR 43.6 million is paid-in and EUR 110.7 million is callable capital.

Activity details

Date of receipt of proposal	12-05-2022
Proposal’s reference number	
Budget holder	DMM (8151DMM)
Anonymize open data	Yes
Limit access	No
Consultation with Embassy / regional department / thematic department	
Related activity	

Accounting data

SAP application number	4000006854
Funds center	DMM Guar. Cou. of Europe (CEB) 18% ODA (0503U03050001)

Policy data

Aid modality	Non-earmarked contributions
Technical assistance	Not applicable
Beneficiary location	Region
Region	Regional Europe
Division of budget	
Ukraine	50 %
Undefined	50 %
Total	100 %
CRS code	43010 Multisector aid
Policy Keywords	
Refugees & host communities	Yes
Policy Markers	
Biodiversity	Significant
Climate change: adaptation	Significant
Climate change: mitigation	Significant
Desertification	Not targeted
Equality between men & women	Principal
Access to education for girls	Principal
Building institutions & capacity	Significant
Environmental protection	Principal
Skills development	Principal
Universal primary education	Principal
Youth employment	Principal

Explain your choices

The CEB had a unique social mandate focused on promoting social cohesion in Europe and protecting the most vulnerable. The following policy markers are 'principal': equality between men & women, skills development, universal primary education and youth employment. These markers are linked to CEB's lines of action: investing in people, promoting inclusive & resilient living environments and supporting jobs and economic inclusion. In addition, CEB is increasingly focused on supporting refugees, migrants and displaced persons via housing and reintegration programs for example.

The CEB has been putting an increasing emphasis on environmentally sustainable development in recent years with a focus on biodiversity. Climate change adaptation and mitigation are significant elements of CEB activities. In 2022 CEB committed to align its activities with the goals of the Paris Agreement. In 2022 it spent EUR 210 million on climate adaptation and EUR 657 million on climate mitigation finance.

Policy Appraisal

Policy relevance

What policy objectives, as set out in the annual plan, policy notes etc., will this activity contribute to?

- This activity helps to create the right conditions for the CEB to set up activities in Ukraine during the ongoing war. Ukraine has recently (15/6) become a member of the CEB. As soon as 67% of the certificates of the capital increase have been subscribed by CEB member states, the bank can establish activities. The capital increase will further strengthen the Bank's financial soundness and consolidate its means of action for preserving and promoting social cohesion across Europe — in line with the CEB's mandate — in a period of recurrent crises lately marked by the Russian aggression against Ukraine. It is in the Dutch interest to support Ukraine and other affected countries during the ongoing war. A CEB capital increase can play a valuable role in Ukraine as it has a unique social mandate which makes it complementary to other institutions in the country.

Rationale

What issue/problem will be addressed by the activity?

- The *Rapid Damage and Needs Assessment* (2022) by the World Bank, European Commission and Ukraine indicated that 45% of the short-term needs lie in the social sector in the housing, health, education and cultural heritage. In addition, more than 17 million people in Ukraine need help, including six million displaced people. More than eight million people have fled from Ukriane to European countries. (UNHCR, 2023).
- Without a capital increase, the CEB is forced to reduce 40% of its current level of activity and reduce its current loan volume from EUR 4 billion per year to about EUR 2.5 billion per year. Given the valuable work the bank is doing, among other things, in the area of the reception of UKR refugees in neighboring countries, this is undesirable. Without a capital increase the bank will not be able to set up activities in OEK. No or limited participation may send a politically undesirable signal, which is inconsistent with the NL policy of supporting Ukraine in the light of the Russian aggression.

Why does the activity help to address the issue/problem?

- The CEB focuses in the member states of the Council of Europe on the financing social projects, including the reception, registration and data collection of refugees, safe transportation, shelter and medical care. As a development bank, the CEB can lend a multiple of the deposited capital.
- Since its inception in 1956, the bank has proven to handle capital paid in by member states with care. The capital contribution of EUR 600 million paid in at the time has increased to EUR 3.1 billion through many years of additions from profits to reserves. With this capital, an ongoing project portfolio of nearly EUR 20 billion has been realized. The leverage from capital to project portfolio is therefore higher than six.
- The CEB will operate in Ukraine based on of the added value due to its social objective, target group (regional and local authorities, social services) and method of operation (short procedures). CEB can focus in the short term on the immediate needs of refugees in OEK starting in 2023. Compared to other development banks, CEB is relatively agile allowing it to generate impact in a short period of time. The CEB was the first development bank to disburse grants to support refugees from Ukraine in surrounding countries. With Ukraine as a recently acceded member state, the CEB plans to establish operations in 2023 and may initially focus on the needs of Ukrainian displaced persons.

For ODA activities over EUR 250.000, please explain the Theory of Change

- To understand the theory of change of the capital increase it is essential to assess what the CEB's activity would have been in its absence.
  Without the capital increase, the CEB would have been obliged to severely cut its activity, including for refugees, starting in 2023. The CEB would not be able to operate in Ukraine, nor be part of international solidarity efforts for the country. This would have been negatively assessed by rating agencies, likely leading to a loss of the CEB's triple-A rating, higher funding costs, and a deterioration of the quality of the loan portfolio.
  With the capital increase the CEB will be able to pursue the overarching goals put forward in the Bank's 2023 -2027 Strategic Framework:
  1. Respond to evolving social development and inclusion challenges in a flexible manner;
  2. Invest in the assistance and integration of refugees and migrants, in their host communities, and in preparedness for future migratory dynamics;
  3. Support the reconstruction and rehabilitation needs of Ukraine's social sectors.

Specifically, the CEB will be able to maintain a volume of around €4.3 billion per year, while slightly increasing support for the below investment grade countries (BIG) such as Albania, Bosnia and Herzegovina, Türkiye and Moldova, as well as initiating operations in Ukraine, which became a fully-fledged member of the CEB on 15 June 2023.
In addition, the CEB will strengthen its focus on the most vulnerable to ensure that no one is left behind. Three cross-cutting themes will guide the CEB's activity: climate action, gender equality and digitalization.
To achieve its objectives the CEB is committed to broadening the range of borrowers and the pool of financing instruments. In addition, the CEB will implement selected actions to improve its operating model further, in terms of organisation, people, tools and processes. Specifically, the CEB will seek to reinforce key areas including human resources, IT, communication, evaluation and learning.

Also see attachment ToR CEB.

Contextual analysis

Who is/are the target group(s) and why?

- Overall, the principal activity of the CEB consists of granting loans to borrowers in its member countries for economically and socially viable projects that promote social cohesion. Target groups are vulnerable populations within the member countries, including refugees, migrants and displaced people. The capital increase will contribute to supporting these target groups and set up activities in Ukraine.

Who are the other main stakeholders?

- As part of the global response to support Ukraine, the CEB continues to work in close coordination with the Government of Ukraine and other International Financial Institutions. In addition, there is high-level coordination between CEB member states at the Administrative Board and Governing Board meetings. More detailed information about stakeholders in Ukraine will be available when CEB is able to share a project pipeline overview. Generally speaking, CEB works with governments, local and regional authorities, and public and private financial institutions.

To what extent have stakeholders been involved in formulating the proposal?

- CEB shareholders have been actively involved in the formulation of the current capital increase scenario. Via various discussions in the CEB Administrative Council, shareholders and CEB management have been working towards consensus. A final decision on the total lending volumes and amount of the capital increase was made during the CEB Governing Board of December 2022 upon recommendation of the Administrative council.

Is the intervention aimed at a specific geographical location, and if so, why?

- Half of the capital increase can be attributed to the CEB's specific intention to conduct operations in Ukraine starting in 2023. The remaining 50% will benefit the region. Member states of the Council of Europe have increasingly relied on the CEB to deal with the consequences of recent crises (COVID, Syrian and Ukrainian refugees). The growing loan portfolio, longer maturities and accelerated disbursements have put the capital position of the CEB under pressure. The CEB therefore proposed a capital increase in May 2022.

Added value

What is the added value of the Dutch government being involved in relation to other donors, the EU, NGOs and local authorities?

- NL is a shareholder of the CEB and has agreed on a capital increase during the Governing Board on 2 December 2022. Currently, NL has a share of 3.6% CEB capital. For the capital increase to become effective, at least 67% of the certificates have to be subscribed by the shareholders before the end of 2023.
- The CEB's intervention in Ukraine will be selective and in line with the priorities of the Ukrainian authorities. The CEB will focus on its sectors of expertise and on serving vulnerable groups, coordinating with authorities to identify the most urgent needs. During the implementation period of the Strategic Framework, the CEB intends to provide lending to Ukraine exclusively at the sovereign level and does not envisage lending to commercial entities or using intermediated lending channels. At the same time, the CEB will continue to monitor the development of possible InvestEU-like guarantee mechanisms that might become available through the Commission's European Fund for Sustainable Development Plus (EFSD+) platform for public companies, sub-sovereign entities, public-private structures and private operators such as micro lenders, and assess opportunities to participate in them.

Are the recipients making an own contribution or co-participating in the activity, and if so, to what extent?

- At a combined meeting of the Governing Board and Administrative Council of the CEB in Dublin on July 8, Ukraine's application to become a member state of the bank was accepted. The total capital with which Ukraine will participate in the CEB including callable capital amounts to about EUR 102 million. Ukraine's redeemable contribution to the capital and general reserves of the CEB, amounting to about EUR 60 million, includes more than EUR 11 million capital contribution and EUR 48 million contribution to general reserves. However, this amount of EUR 60 million will not

have to be borne by Ukraine itself at its request, but will be paid on behalf of the other member states by reducing their claims to the general reserves. For NL, this amounts to over EUR 2 million. However, Ukraine itself becomes liable for approximately EUR 40 million of callable capital. Through this construction, Ukraine becomes a 1.8605% shareholder in the CEB. Ukraine does not contribute to the capital increase.

Lessons learned

What lessons learned (from previous or comparable activities, published evaluations, relevant publications) will be addressed by the activity?

- The capital increase approved in December 2022 is the first of its kind in the history of the bank for its structure and the articulation of objectives and commitments, therefore no evaluations of comparable capital increases are available.
  At the same time, the capital increase will allow the CEB to continue to respond flexibly to the evolving needs of its member countries.
  This flexibility is one of the CEB's longstanding competitive advantages which is appreciated by shareholders and which allows the Bank to deploy its resources where they will add the highest value. Examples:
  - In the aftermath of the Global Financial Crisis the CEB focused its efforts on supporting jobs and livelihoods, including housing and living conditions in both urban and rural areas.
  - During the 2015 migrant crisis the CEB doubled its operations in favour of communities hosting migrants and refugees, and worked to preserve jobs across Europe.
  - In 2020 the CEB prioritised emergency loans to sustain health systems overwhelmed by the outbreak of Covid.
  - In 2022 the CEB again acted rapidly in favour of vulnerable persons displaced by the war in Ukraine and of their host communities. Specifically, the CEB approved EUR 1.3 billion in loans to provide its Member countries with the means to host large numbers of refugees, address their immediate needs and facilitate their integration. In addition, the CEB provided about EUR 6 million in grants for humanitarian aid.
  - In 2023, soon after the devastating earthquakes, the CEB quickly mobilized its resources to support Türkiye: EUR 250 million in 2023, to be disbursed in the coming months for the health sector, and EUR 250 million earmarked for 2024.
- The results clearly demonstrate the Bank's capacity to swiftly adjust its activity in response to crises and to the changed operating context. Being able to adapt this rapidly is a clear reflection of the longstanding expertise the CEB has gained in developing and financing social infrastructure projects.
  The CEB will continue to monitor and evaluate its capacity to react swiftly and effectively.

Durability

How will the results of the activity be sustained after its end date? What is the exit-strategy?

- There is no specific end date for the capital increase, neither is there an exit-strategy.

Gender

Does the proposal include a gender analysis? If yes, what are the main outcomes? If no, why not?

- There is no specific gender analysis included in the capital increase proposal as this concerns a general contribution to enable CEB to continue its activities in its countries of operations as well as setting up new activities in Ukraine.

Does the proposal justify the target group's gender-specific interests and needs (and why)? Please explain.

- The proposal does not target group's gender-specific interests, however NL will ask the bank to take into account inclusiveness in its activities whenever this is possible.

Have women and young people been included in the stakeholder analysis? Please explain.

- The proposal does not target specifically women and young people in the stakeholder analysis, however NL will ask the bank to take into account inclusiveness in its activities whenever this is possible.

Climate change

Does the proposal include an analysis of the possible effects of climate change on the activity or its results?

- The proposal does not include an analysis of the possible effects of climate change on the activity of its results. However, the CEB has one of the highest standards when it comes to climate ambitions and NL will encourage the bank to scale up its climate ambitions whenever it can.

Does the proposal include any interventions to combat these effects (adaptation/mitigation)?

- The proposal does not include any interventions to combat the effects of climate adaptation and/or mitigation. Climate action financing in 2022 represented 20% of the total volume of financing approved up from 13% in 2021. NL will encourage the CEB to scale up its ambitions.

Cooperation, harmonisation and alignment

Does the activity involve cooperation with Dutch organisations, the EU or other donors (including delegated cooperation), local organisations or other parties?

- CEB has 43 member states, including Ukraine. All member countries (except for Ukraine) are requested to contribute to the capital increase. Furthermore, to set up activities specifically in Ukraine, the CEB actively engages with the Ukrainian authorities.

How does the activity contribute to harmonisation and/or multi-donor financing?

- In order for the CEB to continue its activities based on its social mandate to support social cohesion in its current countries of operations as well as setting up new ones in Ukraine, a capital increase is needed. Capital increase contributions are not earmarked, therefore contributions are harmonized for all contributors.

What is the degree of (policy and financial) alignment?

- A NL contribution to the CEB capital increase aligns well with the NL position to support Ukraine and the affected region. With a relatively small contribution, NL can help to enable the CEB to become active in Ukraine and set up projects based on its social mandate.

Digitalisation

Have proposed digital technologies been developed or chosen in collaboration with end-users?

- The proposal does not include specific digital technologies.

Does the proposal include an analysis of the local digital ecosystem?

- The proposal does not include an analysis of the local digital ecosystem.

Is data security guaranteed?

- The proposal does not include any information on data security. However, NL will address this topic whenever it is relevant.

Are digital solutions locally sustainable/relevant?

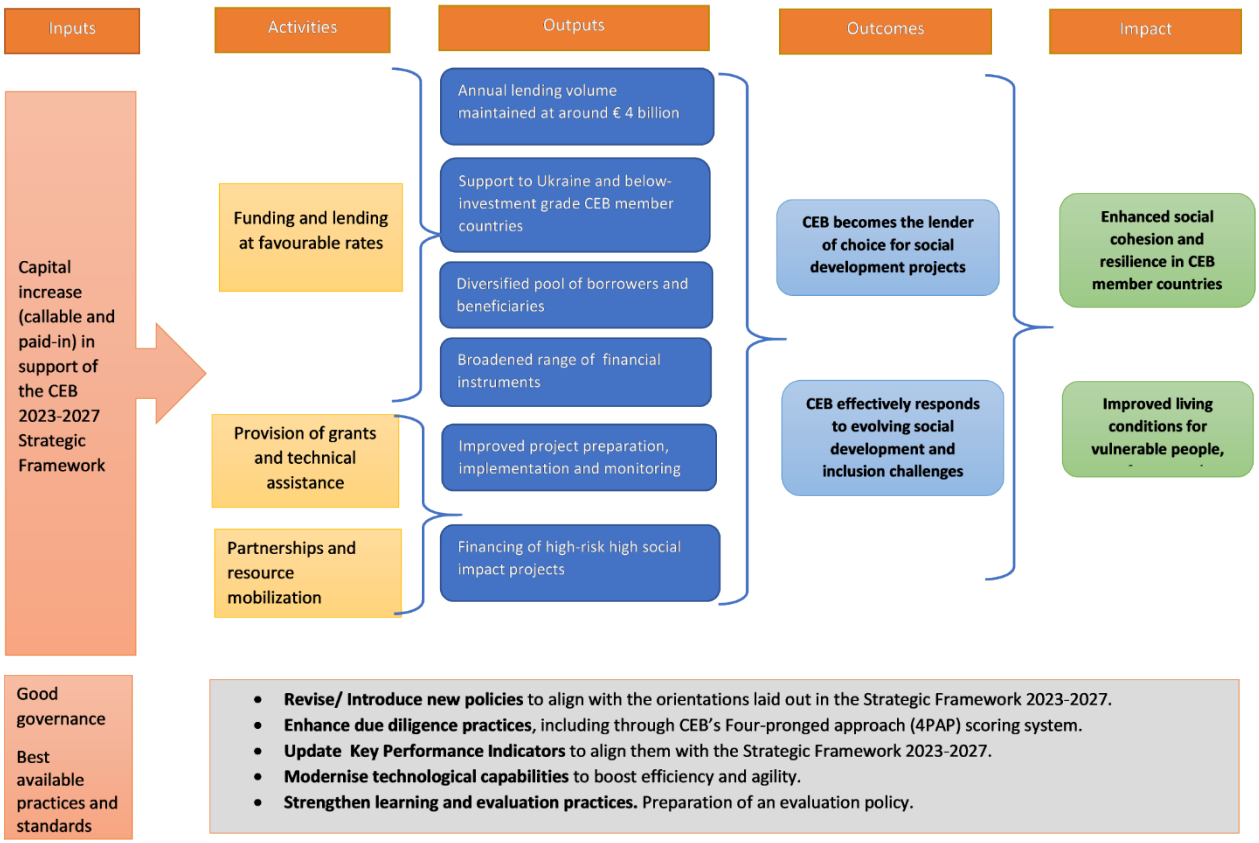
- The proposal does not include any information on this matter.

Is duplication avoided?

- The proposal does not include any information on this matter. However, duplication is unlikely as the CEB has a specific niche among IFI's (focus on social cohesion - social mandate) and has a unique track record of supporting refugees, migrants and displaced people. NL encourages IFI's to complement and not duplicate activities.

Additional remarks (if applicable)

Figure 1: CEB's Capital Increase – Theory of Change



Results

What are the main OUTPUTS (services and products) that will be delivered through the activity? Describe briefly.

- The capital increase will enable the CEB to continue its activities (providing loans to co-finance projects in any of its 43 member states) in its countries of operation and set up activities in Ukraine that has recently become a member of the bank. Potential borrowers include governments, regional or local authorities and public or private financial institutions and banks. The CEB Project Loans usually finance predefined individual infrastructure investments while Programme Loans are used for funding multi-project programmes, mostly in support of MSME and municipal investment programmes and often disbursed via the CEB's commercial bank partners. While the EU Co-financing Facility (ECF) allows for co-financing and/or ex-ante financing of EU-funded investment activities at the country level, the Public Sector Financing Facility (PFF) covers temporary financing gaps in the public sector and facilitates the continuation of investments and reform programmes. Lastly, the Cross-Sectoral Loan Programme (CSL) responds to the public authorities' social infrastructure needs in several overlapping sectors.

What are the main OUTCOMES (changes and effects for the target groups) that will be achieved through the activity? Describe briefly.

- Main outcomes will be in line with the social mandate of the bank to support social cohesion in Europe. The breakdown per sector for projects improved in 2022 gives a good impression of potential outcomes:

Breakdown by sector: Projects approved in 2022 in € thousands

Sector	**Amount**	**Percentage**
Housing for low-income persons and aid to refugees, migrants and vulnerable people	1.432.300	33.8%
Health and social care	734.200	17.3%
Supporting MSMEs for the creation and preservation of viable jobs	680.000	16.0%
Natural or ecological disasters	550.000	13.0%
Improving living conditions in urban and rural areas	405.500	9.6%
Protection of the environment	289.000	6.8%
Education and vocational training	122.500	2.9%
Other	30.000	0.7%
Total	**4.243.500**	**100%**

For the OUTPUTS and OUTCOMES mentioned above (or add snapshot from results application):

- Specify the indicators if agreed upon with the contract party: while there are no specific indicators directly linked to the capital increase, the CEB's Strategic Framework 2023-2027 mentions the following cross-cutting themes for this period: 'the climate crisis as a social crisis', 'gender equality' and 'the digital transformation'. The following sectoral directions for this Framework are mentioned: 'Investing in People and Enhancing Human Capital', 'Promoting Inclusive and Resilient Living Environments' and 'Supporting Jobs and Economic and Financial Inclusion'.
- Specify the baseline values and targets if applicable: The proposal does not specify any specific values or targets when it comes to output. In terms of outcome: the capital increase should contibute to a better social cohesion in Europe and stabilization of the social end economic situation in Ukraine.

What method will be used to gather and monitor the data?

- The CEB will provide annual progress reports with its donors to update about the results in its countries of operations. In addition, member states have enforced a mid-term review after two years specifically for Ukraine given the highly uncertain environment due to the war. The annual progress reports as well as the mid-term review allow shareholders and CEB management to make adjustments if risks are deemed too great.

Record the following in the **results application**:

- the thematic results frameworks that apply to this activity;
- the relevant indicators (including baseline values and targets if applicable).
- N/A

Have these results frameworks been communicated with the contract party?

- N/A

Do the indicators correspond to one or more of the 17 indicators on which the ministry reports to the Dutch parliament? If not, why?

- N/A

Implementing Organisation(s)

Selection of implementing organisation(s)

Why has/have the implementing organisation(s) been chosen?

- The CEB has a specific social mandate focused on support in the areas of migration and social cohesion. This mandate allows the bank to make a useful contribution to social projects. The CEB can focus on the immediate needs of refugees in Ukraine starting in 2023. Compared to other development banks the CEB is relatively agile which allows it to generate impact in a short period of time. The CEB was the first development bank to disburse grants to support refugees from Ukraine in surrounding countries. With Ukraine as a recently acceded member state, the CEB plans to establish operations as early as 2023.

Describe the implementing organisation(s).

- The oldest European multilateral development bank, the CEB was established in 1956 by eight Member States of the Council of Europe on the basis of a partial agreement in order to bring solutions to the problems of refugees. The CEB has its origins in the political upheavals that Europe experienced following the Second World War, leading to a flood of refugees and displaced persons into Western Europe. Working to strengthen social cohesion in accordance with its mandate, through its lending activity the Bank promotes the values and principles of the Council of Europe. It is nevertheless a separate legal entity and financially independent.
- The CEB is active in the sectors of health and social care, education and vocational training, administrative and judicial infrastructure, historic and cultural heritage, social and affordable housing, urban rural and regional development, natural or ecological disasters, environmental protection, MSME financing, and microfinance. Three cross-cutting themes guide the way in which CEB activities are designed and implemented across all sectors: climate action, gender equality, and digitalisation.
- The Netherlands joined the CEB on 01 January 1978. The Dutch Representative to the Governing Board is Ms. Tanja Gongrijp, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of the Netherlands to the Council of Europe, Strasbourg. As the Dutch Representative to the Governing Board, Ms. Gongrijp will sign the 'Instrument of subcription' in which the Netherlands confirms the payment scheme to participate in the capital increase. The budget holder however is the Dutch Ministry of Foreign Affairs (DMM). The Dutch representative to the Administrative Council is Mr. Johannes Smeets, Advisor to the Dutch Ministry of Foreign Affairs. The Netherlands has a total capital share of 3.564% in the CEB.

Capacity assessment

Has an up-to-date capacity assessment (ORIA, PARTOS ISO-9001 certification, Scorecard) of the implementing organisation been carried out (include the date)?

-
    - If yes: what were the main conclusions? Has there been any follow-up? (Note: ORIA is mandatory for commitments over EUR 1.000.000)
        - Yes, an ORIA template has been filled in by the CEB on 22 September 2023 and has been assessed by the Dutch Ministry Affairs on 16 October. Internal reference number: MINBUZA.2023-1386828. The criteria are assessed as follows in the conclusoin secton of the assessment (A - highly satisfactory, B - Satisfactory, C - Unsatisfactory, D - Highly Unsatisfactory:

Criteria	Score
2.1 Vision, Mission and Strategy	B
2.2 Track Record	A
3.1 Structure and Governance	A
3.2 Financial Resources	B
3.3 Human Resources	B
3.3.1 Pre-employment screening (this is paragraph 3.3.2 in part A)	A
3.4 Risk Management	A
3.5 Links with other Organisations	B
3.6 Monitoring & Evaluation	B
3.7 Financial & Administrative Management	A

4.1 External Factors & Relations	B
4.2 Integrity Procedures (this is paragraph 3.4.2 in part A)	A

- If no, please answer the questions below:
  - In which way does the organisation convincingly demonstrate relevant experience and successes in terms of expertise and effectiveness, evaluation and learning capacity, transparency, accountability and public support, knowledge of the country context, inclusive approach and sustainability?
  - Is there an annual report audited by an external and independent auditor? Determine whether there are points of attention which could affect the results and explain.
  - If the organisation is acting as an intermediary (i.e. channelling the funds to other implementing partners), how has supervision been arranged and what are the individual roles of the parties concerned? Stay alert to the 'accountability gap'. Also describe how the organisation selects its implementing partners.

- The consecutive Pillar Assessments by the European Commission (EC), the CEB's largest donor, have been among the most substantial external capacity assessments regarding the CEB, its management, procedures and operations in recent years.
  The EC regularly introduces new requirements that entities must meet to manage EU funds. As a result, the CEB successfully underwent a first pillar assessment in 2010, the second one in 2015 and the third one in January 2022.
  The latest pillar assessment by the EC resulted in updates and improvements such as those relating to the updated CEB Public Information Policy, which incorporates new EU requirements with respect to the publication of information on recipients of EU funds and other measures to improve transparency. Moreover, the CEB's Loan and Project Financing Policy, which defines the basic principles for the selection and implementation of the investment projects financed by the Bank, was also updated to reflect a set of key principles for the use of donor funds, in line with EU requirements on the management of its funds.
  The CEB's operational, financial and credit risk management capacity is also continually being assessed by external credit rating agencies as well as Environmental, Social and Governance-criteria centred ones, which closely evaluate CEB's strategy, management and overall performance.
  In March 2023, Moody's upgraded the CEB's rating to triple A in light of the approved capital increase, whose magnitude "is testament to shareholding member states' strong support for the CEB as well as the bank's enhanced relevance in tackling key social challenges in Europe"[1].
  The CEB's internal policies are aligned to the highest peers' standards, be it on complying with ESG (Environment, Social and Governance) criteria at corporate level; ensuring environmental and social safeguards at project level; addressing climate change, especially for the most vulnerable; and contributing to the 2030 Agenda for Sustainable Development. Nonetheless, the CEB continues to improve further. For example, in February 2023 the CEB obtained the second-highest level of the Economic Dividends for Gender Equality (EDGE) certificate. In 2022 the CEB Gender Diversity Group which was created in 2018 following the adoption of the CEB Gender Equality and Diversity Strategy by the Administrative Council evolved into a Diversity & Inclusion (D&I) Group. The Group's objective is to raise awareness and promote a multi-dimensional approach on D&I at the CEB, including gender, age, sexual orientation, ethnicity, religion, physical ability, neurodiversity, education, social and national origins.
  The CEB adopts a system of Key Performance Indicators (KPI) currently under revision to align them with its new Strategic Framework. The KPIs are reviewed annually by the Administrative Council, one of the Governing Bodies of the CEB.
  The CEB's evaluation function plays a critical role in assessing the Bank's capacity to deliver efficiency and effectiveness in CEB-financed operations and achieve sustainable development results in line with the CEB's social development objectives and mandate.

In this context, the CEB undertook its first ever corporate-level evaluation of the Migrant and Refugee Fund (MRF) in 2018 to (i) assess whether and how the design and functioning of the MRF were conducive to reaching the stated objectives; (ii) highlight lessons to be learned from this experience and provide the Bank with knowledge that can be applied to future cases of new, dedicated grant-funded instruments.
The evaluation showed that the MRF has been valuable. The operations financed under the scheme delivered much-needed assistance and were in tune with the national and social priorities of CEB Member States. As concluded by the report, "The MRF has been a valuable experience for CEB: a path-breaking step was taken, both conceptually and in practice. Much can be learned from this unique experience, which undeniably reinforced CEB's external visibility and consolidated its founding social mandate".

[1] Moody's Rating action March 10, 2023. The CEB is rated triple-A by S&P and AA+, positive outlook by Fitch.

Integrity assessment

Have the organisation's integrity policy and associated procedures and accountability regarding inappropriate behaviour been assessed?

- The Office of the Chief Compliance Officer (OCCO) aims to ensure that CEB projects meet the Bank's compliance and high integrity standards. This ex-ante work performed in OCCO entails a variety of tasks, ranging from mapping out the risks, to mitigating risks and to establishing appropriate procedures and controls. The integrity due diligence procedures and controls are reviewed regularly in order to maintain any residual risks at a level that is acceptable to the CEB, and to meet market expectations created by a continuously changing regulatory landscape.
- In June 2021, the CEB approved a new set of codes of conduct for staff, elected officials, Collegial Organs and Auditing Board. The new codes of conduct include a reference to ESG good practices, social media use and CEB values. Oversight on these ethics issues is undertaken by OCCO. This is pursued in several ways, including through the regulation of conflicts of interests, gifts and sundries advantages, favours and benefits, the revision of the CEB's codes of conduct to prohibit passive/active corruption and facilitation payments, the deployment of a mandatory code of conduct training course for all CEB staff and the carrying out of investigations where allegations are made regarding code of conduct breaches.

If not, carry out the assessment yourself using the source documentation and record the outcome of the assessment. In so doing, establish whether:

- the organisation has a policy in place (code of conduct) whereby staff can be held to account regarding certain behaviours;
- the organisation has a channel for reporting incidents, such as an integrity adviser;
- the organisation has whistleblower regulations in place;
- the organisation reports on incidents in its social annual report, for example.

If an organisation has not embedded the aforementioned safeguards into its working practices, discuss these issues with the organisation. Set out the outcomes of the discussion, along with key points that should be included in the contractual agreements. Finally, draw a conclusion as to why funding the activity, with the above safeguards in place, is justified.

Risks

Contextual risks

Despite the significant risks inherent to investing in Ukraine during the war, it is of major importance for the Netherlands to support Ukraine where it can. Therefore, despite the risks of setting up projects in Ukraine, the Netherlands sees a capital increase to the CEB as valuable. In this context, the social mandate of the CEB that is aimed at enhancing social cohesion, is regarded as safer than for example the construction of infrastructure.

As half of the capital increase is intended to continue operations in CEB's current countries of operation it is also important to take into account the potential risk in these countries. Next to Ukraine, the CEB has 42 member countries that can all receive loans. Because of this high number of member countries it is not possible to assess the risks for each country. However, specific risks that would apply to member countries in general are indicated below.

Identification	Risk (description)	Probability of Risk occuring (Low/Medium/High + explanation)	Potential Impact on outputs of activity (Low/Medium/High + explanation)	Mitigating measures and residual risk (incl. appreciation)
	Disruptions to the host institutions and implementing teams caused by military actions, or threat thereof.	High. Given the current war in Ukraine there is a high risk that events might occur that limit/halt certain actions by CEB.	High. Given the current war in Ukraine there is a high risk that this might impact the outputs of the activity.	The CEB has developed strong relations with its Ukrainian counterparts, enabling prompt identification of potential obstacles to successful project implementation and formulation of appropriate responses. However, given the highly unpredictable situation in Ukraine the risks remain high.
	Disruption to the host institutions and implementing teams caused by a potential escalation of the war in Ukraine leading to the involvement of other CEB countries of operations.	Medium. The ongoing war in Ukraine could potentially further escalate to its neighbouring countries and/or NATO involvement.	Medium. The involvement of other countries in the war could potentially have severe impact on the outputs of the activity.	Given the highly unpredictable nature of this war it is hard for the bank to put it place mitigating regards, apart from valuable the strong cooperation and connections the bank already has in its countries of operations.
	Crises that impact a large share or all of CEB's countries of operation (such as an economic crisis or a pandemic).	Medium. Over the past decades crises such as the economic crisis and the COVID-pandemic led to increased activities of the CEB in its countries of operation. The possibility of a new crisis can not be ruled out.	High. Impact of a potential crisis can be high, depending on its nature.	The CEB has relevant experience with crises and has proven te be able to respond swiftly and efficient. However, every crisis is different and therefore it is difficult to anticipate on all possible events.

Programme risks

Identification	Risk (description)	Probability of Risk occuring (Low/Medium/High + explanation)	Potential Impact on outputs of activity (Low/Medium/High + explanation)	Mitigating measures and residual risk (incl. appreciation)
	Delays in implementation and risk of inadequate inter-agency cooperation and coordination.	High. Due to the fact that CEB has not enrolled project before in Ukraine, there is a risk of delays in implementation and risks of inadequate inter-agency cooperation and coordination.	High. In case of inadequate inter-agency cooperation and coordination, the impact on outputs of activity will be high as programmes will not be able to unfold efficiently.	Ukrainian goverment and CEB both expressed their highest commitment to the task and there seems to be good cooperation. The necessary political commitment is deemed to be in place, with the urgent needs in Ukraine and the prospect of stronger European ties as a strong motivator.
	Lack of financial resources required to effectively develop and implement CEB strategies in Ukraine. This could also impact CEB's operations in its other countries of operation.	Low. A minumum of 67% of the certificates for the capital increase must be subscribed before the end of the year in order for the capital increase to become effective.	High. In case there will not be enough participants for the capital increase, the bank will most likely not be able to set up activities in Ukraine and will have to lower its activities in its current countries of operation.	There is a strong shareholder commitment to participate to the capital increase. In December 2022, shareholder unanimously supported the capital increase. However, some capitals may have difficulty in releasing the necessary funds.

Organisational risks

	Identification	Risk (description)	Probability of Risk occuring (Low/Medium/High + explanation)	Potential Impact on outputs of activity (Low/Medium/High + explanation)	Mitigating measures and residual risk (incl. appreciation)
Monitoring and evaluation		Inefficient communications between units across the institutions.	Medium. Based on current experience, communication between the departments involved can be expected to continue normally despite the war.	Medium. A lack of communication about monitoring and evaluation on impact might lead to less effective strategies by the CEB as shareholders might not be aware of all developments and will therefore not be able to adjust when necessary.	Information is provided regularly via NL constituency. In addition, CEB has a solid track record when it comes to monitoring and evaluation regarding its activities.
Financial and administrative management		Insufficient project management.	Medium. Based on CEB track record, there are no specific reasons to expect	Medium. Insufficient project and fund management could	CEB has a proven high standard when it comes to

	Identification	Risk (description)	Probability of Risk occuring (Low/Medium/High + explanation)	Potential Impact on outputs of activity (Low/Medium/High + explanation)	Mitigating measures and residual risk (incl. appreciation)
			insufficient project management, however the circumstances in Ukraine might offer additional challenges in this regard. For the existing countries of operations there is no specific cause to believe there will be insufficient project management.	potentially lead to adverse results.	its financial and administrative project management.
Quantity and quality of capacity available for the activity		Low capacity and/or quality of CEB personnel could lead to less effective implementation of the MDA.	Low. There are no indications that there is a lack of capacity of quality to perform the desired activities.	High. Low capacity and quality of key executing actors might have significant impact on the output of the activities.	CEB has extensive experience with migrants, regufees and displaced persons. This will form a substantial part of its activities in Ukraine. While the country and specific country context is different, the bank has solid experience with setting up activities based on its social mandate.

Risk of fraud and corruption

	Identification	Risk (description)	Probability of Risk occuring (Low/Medium/High + explanation)	Potential Impact on outputs of activity (Low/Medium/High + explanation)	Mitigating measures and residual risk (incl. appreciation)
In country of implementation		Especially in the current war situation in Ukraine, there is a real risk that some of the funds will not be spent efficiently or effectively, or will end up in the wrong place due to corruption. This was also a concern in Ukraine before the war. This could	Medium. Ukraine has a strong motivation to collaborate with CEB also given its desire in terms of further European integration. In addition, CEB uses formal agreements that clearly outline expectations from both sides, this also applies to its other countries of operations.	High. Corruption might have a high impact on the output of activities.	CEB management mitigates this risk to an acceptable level due to its connections and formal agreements for projects.

	Identification	Risk (description)	Probability of Risk occuring (Low/Medium/High + explanation)	Potential Impact on outputs of activity (Low/Medium/High + explanation)	Mitigating measures and residual risk (incl. appreciation)
		also be applicable in CEB's other countries of operations where there is corruption.			
In programme		Risk of an uncoordinated implementation.	Low. CEB is a development with bank with long experience and a good track record.	Low. Potential impact might be that different actors are working on the same subject without coordination which might impact the efficiency.	CEB has a good track record of implementing its programs and coordinates with other institutions when needed.
Within implementing organisation(s)		Lack of efficiency.	Medium. Due to the highly uncertain situation Ukraine is in, as well as the spill-over effects the war might have on CEB's other countries of operations, there is a risk of a decrease in efficiency of the implementing organisation.	Medium. Given the current situation Ukraine is in now, CEB might find it difficult to achieve the desired results.	CEB has been active in countries that deal with the effects of the war in Ukraine and has a proven track record when it comes to supporting migrants, refugees and displaced peIople. n addition, the CEB works with the Ukrainian government to make sure CEB actions are in line with the country needs.

Additional remarks (if applicable):

State aid risk

Questions (mandatory)	Answers (Yes/No, include explanation)
Is there an intention to support a profit-oriented entity? * If yes, please continue with the questions below. * If no, please continue with the questions below if the contract party is NOT a multilateral organization and if at least EUR 250.000 (or the equivalent in foreign currency) of the Dutch support is spent in the European Union. In all other cases, the risk analysis is concluded.	No, the purpose of the CEB capital increase is to enable the bank to set up projects in Ukraine to support the country and to enable to bank to continue its other operations in its existing countries of operations. CEB projects are selected based on the CEB's social mandate and should contribute to European social cohesion and support for Ukraine.

Questions (mandatory)	Answers (Yes/No, include explanation)
Is the contract party engaged in economic activities, i.e. does the contract party offer goods or services that are available on a market? Motivate your choice and include a brief description of the activities in the explanation. *Note: non-profit organisations can also be engaged in economic activities.*	N/A
Does the support give the contract partner an advantage which it would not have obtained under normal market conditions? Motivate your choice. *Note: if the contract is awarded through competitive, transparent, non-discriminatory and unconditional tenders, this question can be answered with no. A grant or contribution by definition confers an economic advantage which is not in line with normal market conditions.*	N/A
Is the advantage selective? Motivate your choice. *Note: Selective means that a small group of organisations or a single organisation enjoys an advantage.*	N/A
Will the advantage distort or potentially distort competition on the EU internal market and may it affect trade between EU member states on the internal market? Motivate your choice. *Note: Aid to entities that are not established in the EU internal market and that only carry out activities at local level is not considered to distort competition in the internal market or affect trade between member states of the European Union.*	N/A

If you answered 'yes' to one of the questions above, contact DJZ/ER for advice.

Monitoring and evaluation

Monitoring

Specify what reporting information is required for this activity, based on the activity analysis decision tree (see Help).
Include the following elements:
Planning versus realisation: tracking progress against predetermined objectives as laid out in the project proposal.
Performance and quality: checking relevance and appropriateness of the implementing organisation's performance based on key assumptions in the proposal and the outcomes of the risk analysis.
Pay attention to the method and frequency of monitoring and describe the roles and responsibilities. For further information, see Help.

- The risks of operating in Ukraine are high and will be carefully assessed and mitigated whenever possible through enhanced appraisal and monitoring. The CEB's procedures for credit, financial, and project risk assessment, including technical specifications, tendering procedures, absorption capacity, etc., will continue to be applied. The application of appropriate project management mechanisms will contribute to minimising the risks associated with project implementation, including budget overruns, litigation as well as reputational risk. Throughout the life cycle of projects, the CEB will strive to reinforce, where relevant, its monitoring and oversight, counting on the expertise of its dedicated services and the experience acquired in similar contexts. Moreover, the CEB will continue to provide expert advice as well as technical assistance through its various trust funds to remove bottlenecks and support implementation. Collaboration with other MDBs and development partners in Ukraine will also help in mitigating the risks. Credit enhancements with support from donors could also reduce the risks of operating in Ukraine.
- In addition, the CEB shares annual financial reports with its shareholders that include project results etc and there will be a mid-term review regarding the CEB's operations in Ukraine to evaluate the risks and to adjust when necessary.
- The CEB will provide annual progress reports with its donors to update about the results in its countries of operations. In addition, member states have enforced a mid-term review after two years specifically for Ukraine given the highly uncertain environment due to the war. The annual progress reports as well as the mid-term review allow shareholders and CEB management to make adjustments if risks are deemed too great.

Evaluation

Describe whether a final evaluation and/or a mid-term review has been planned. If yes, state:
who will commission the final evaluation and/or mid-term review (for options, see Help);
whether the procedure and practical arrangements have been agreed on with the implementing organisation (for details, see Help).

- Annual reports and regular (monthly updates) in the Administrative Council provide evaluations on CEB functioning and will continue to do so after the capital increase. For the banks activities there will be a mid-term review to evaluate the risks. There is no final evaluation foreseen as the process after the capital increase will be ongoing and Ukraine will remain a member of the bank.
- CEB has shared a memorandum with its shareholders in which the procedures and practical arrangements regarding the capital increase are outlined. In addition, shareholders can reach out to the Bank's Management and its services. The Administrative Council will be regularly updated on the progress of the subscription confirmation process.

Finance

Budget breakdown

Include an overview of the activity budget, including overhead costs.

- See attachment for overview of CEB capital situation and capital increase.

Is the budget arithmetically correct?

- Yes.

Are the amounts/rates in the budget acceptable?

- The amounts in the budget are acceptable, even though, the bank only contributes to a small part of the total needs of its countries of operation, especially in Ukraine. It is therefore important that CEB works together closely with other MDB's.

Briefly explain the structure of the budget.

- At the CEB's Administrative Council on 3 November 2022, it was decided that the capital increase will total EUR 4.25 billion of which EUR1.2 billion will be paid in (28.24%). Half of the capital increase concerns a paid-in capital buffer (funded guarantee) to cover the risk of operations in Ukraine. The paid-in EUR 600 million from shareholders will guarantee a total of EUR 1.571 million of operations in Ukraine. For The Netherlands, the total amounts to a total capital increase of EUR 154.3 million, of which EUR 43.6 million is paid-in and EUR 110.7 million is callable capital.
- The NL contribution to the capital increase is internally structured as follows:
  - Callable capital: EUR 110,703,434
  - Paid in capital: EUR 43,565,566.
    These amounts are administered as follows:
    1) Guarantee commitment: EUR 55,351,717 budget place 0503U03050001 DMM Guarantee COE 18% ODA
    2) Guarantee commitment: EUR 55,351,717 budget place 0503U03060001 DMM Guarantee CoE OEK 100% ODA
    3) Payment: commitment EUR 21,782,783 budget place 0503U03040001 DMM Capital commitment OEK; payment in full in 2023
    4) Payment: committment EUR 21,782,783 budget place 0503U03030001 DMM Capital commitment CEB; payment in 2024 and beyond.

Are overheads proportional to outputs? What is included? What is recharged?

- Total overhead costs in relation to outputs are difficult to determine at this stage as the total project pipeline of the CEB in Ukraine is not yet available. Also, due to the devastating consequences the war might have on CEB activities and the Ukrainian economy, any projections at this stage on overhead costs and recharging would be highly speculative. Apart from Ukraine the CEB can provide loans to any of its other 42 Member States in accordance with its mandate. A group of 22 countries are called 'target countries'. In these countries the bank aims to provide increased support. Based on previous CEB activities in existing countries of operation, there is no reason to question whether CEB's overhead costs are proportial to its outputs.

Is implementation conditional on the budget being amended in an inception phase? (Specify the requirements that the budget must satisfy and the date by which the budget must be amended)

- To decide that the capital increase will become effective at the end of the calendar month in which at least 67% of the participating certificates offered have been subscribed; Member States that have subscribed have to pay the first of the abovementioned four yearly instalments by the end of the calendar month following the date when the capital increase becomes effective; for Member States subscribing only after the effective date of the capital increase but before the end of the subscription period, the first of the abovementioned yearly instalments will be due by the end of the calendar month following the date of the subscription of the relevant Member State; for all subscribing Member States subsequent yearly instalments are due by the 31st of July of 2024 and of the following years.

Is the budget suitable as a management tool (linking outputs to budget)?

- No.

Earmarking

Is the Dutch contribution to the programme earmarked (i.e. reserved for a specific purpose)? If so, specify the reasons why.

- The Dutch contribution is not earmarked. NL contributes to a general capital increase, of which half of it will be used to set up activities in Ukraine. The other part will enable the CEB to continue its operations in the current countries of operations (also dealing with the effects of the war e.g. refugees).

Prepayments

Based on the prepayment decision tree (see Help), do the payments need to be entered as prepayments and why? In the case of a lump sum, assess this against the applicable criteria and give the reasons for your choice.

- The payment is a lumpsum payment. There 1) are several donors contributing to this activity, 2) the Dutch contribution is non-earmarked and 3) there is an effective governance structure based on the Administrative Council and the Governing Board as mentioned earlier. These answers follow from the 'prepayment management instructions' document, paragraph 'lump sum contributions'.

What is the maximum percentage that can be paid as prepayment, and why?

- N/A, it is a lumpsum payment.

Which are the reporting obligations on the basis of which prepayments can be closed?

- N/A, it is a lumpsum payment.

Available resources

At the CEB's Administrative Council on 3 November 2022, it was decided that the capital increase will total EUR4.25 billion of which EUR1.2 billion will be paid in (28.24%). Half of the capital increase concerns a paid-in capital buffer (funded guarantee) to cover the risk of operations in Ukraine. The other half of the capital ensures that CEB can continue its current activities at the same level in its other countries of operation. The paid-in EUR 600 million from shareholders will guarantee a total of EUR 1.571 million of operations in Ukraine. For the Netherlands, the total amounts to a total capital increase of EUR 154.3 million, of which EUR 43.6 million is paid-in and EUR 110.7 million is callable capital.

	Foreign currency	**EUR**
Implementing organisation's own contribution	N/A	-
Firm commitments by other donors (for each donor)	EUR	See attachment - Total now is 41.459%
Dutch contribution	EUR	Total 154.3 million (43.6 paid-in / 110.7 callable capital)
Total available resources	EUR	1.76 billion
Budget needed	EUR	4.25 billion of which 1.2 billion will be paid in (28.24%)
Still to be financed	EUR	2.49 billion
Soft commitments by other donors (for each donor)	EUR	GER (16.414%) - 710.593.000 With the GER and NL (3.6%) contribution the total will be 61.3% - this means that the at least 6% of the remaining 23 countries is needed to reach the required 67%. This is likely to happen.
Uncovered balance	EUR	1.779.407.000 (without NL contribution)

Are there any non-financial contributions relevant to implementation of the activity, such as deployment of volunteers, availability of buildings, materials, etc.?

- No.

If there is an uncovered balance, how will this affect implementation of the activity (e.g. proportional reduction in outputs, omission of regions) and how will this affect the decision whether to fund this activity?

- A total of 67% of the certificates need to be subscribed before the end of the year. Currently 41% of the certificates have been described, with more following from GER, NL and others.

Grant with a repayment obligation, loans, equity investment or guarantee

Does the Dutch contribution take the form of a grant with a repayment obligation, a loan, an equity investment or a guarantee (either in whole or in part)? If yes, briefly set out the consequences for accounting and how correct processing in the financial records will be ensured.

- Yes, there is an amount of EUR 110,703,434 in callable capital. Budgetary reservations have been made in order for NL to provide this amount.

Are there revolving funds? If yes, please explain what will happen to any residual funds, how closure will take place and which agreements should be made.

- No.

Audit opinions

Is an audit opinion required for the activity (see Help)? Briefly explain.

- The CEB shares annual financial reports with its shareholders that include project results etc. In addition, member states have enforced a mid-term review after two years specifically for Ukraine given the highly uncertain environment due to the war. The annual progress reports as well as the mid-term review allow shareholders and CEB management to make adjustments if risks are deemed too great.

Should the audit opinion be accompanied by an additional auditor's report (for example, on the risks set out above, or on monitoring that the organisation carries out on its prepayments to other organisations)?

- N/A

Appendix 2: Capital situation before / after capital increase, capital to be subscribed / paid in

CEB's Capital situation and capital increase

	Situation as at 31/10/2022					Proposed capital increase					Situation after the capital increase *				
	Subscribed capital		Uncalled	Paid-in capital		Subscribed capital		Uncalled	Paid-in capital		Subscribed capital		Uncalled	Paid-in capital	
	Subscribed capital	% of subscribed capital	Uncalled Capital 3=1-4	Paid-in capital	% 5=(4/1)	Subscribed capital	% of subscribed capital	Uncalled Capital 8=6-9	Paid-in capital	% 10=(9/6)	Subscribed capital	% of subscribed capital	Uncalled capital 13=11-14	Paid-in capital	% 15=(14/11)
euros	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
France	915,770,000	16.720%	814,114,000	101,656,000	11.101%	710,593,000	16.720%	509,921,537	200,671,463	28.240%	1,626,363,000	16.720%	1,324,035,537	302,327,463	18.589%
Germany	915,770,000	16.720%	814,114,000	101,656,000	11.101%	710,593,000	16.720%	509,921,537	200,671,463	28.240%	1,626,363,000	16.720%	1,324,035,537	302,327,463	18.589%
Italy	915,770,000	16.720%	814,114,000	101,656,000	11.101%	710,593,000	16.720%	509,921,537	200,671,463	28.240%	1,626,363,000	16.720%	1,324,035,537	302,327,463	18.589%
Spain	597,257,000	10.905%	530,958,000	66,299,000	11.101%	463,443,000	10.905%	332,566,697	130,876,303	28.240%	1,060,700,000	10.905%	863,524,697	197,175,303	18.589%
Türkiye	388,299,000	7.089%	345,197,000	43,102,000	11.100%	301,301,000	7.089%	216,213,598	85,087,402	28.240%	689,600,000	7.089%	561,410,598	128,189,402	18.589%
Netherlands	198,813,000	3.630%	176,743,000	22,070,000	11.101%	154,269,000	3.630%	110,703,434	43,565,566	28.240%	353,082,000	3.630%	287,446,434	65,635,566	18.589%
Belgium	164,321,000	3.000%	146,083,000	18,238,000	11.099%	127,505,000	3.000%	91,497,588	36,007,412	28.240%	291,826,000	3.000%	237,580,588	54,245,412	18.588%
Greece	164,321,000	3.000%	146,083,000	18,238,000	11.099%	127,505,000	3.000%	91,497,588	36,007,412	28.240%	291,826,000	3.000%	237,580,588	54,245,412	18.588%
Portugal	139,172,000	2.541%	123,724,000	15,448,000	11.100%	107,991,000	2.541%	77,494,342	30,496,658	28.240%	247,163,000	2.541%	201,218,342	45,944,658	18.589%
Sweden	139,172,000	2.541%	123,724,000	15,448,000	11.100%	107,991,000	2.541%	77,494,342	30,496,658	28.240%	247,163,000	2.541%	201,218,342	45,944,658	18.589%
Poland	128,260,000	2.342%	114,023,000	14,237,000	11.100%	99,524,000	2.342%	71,418,422	28,105,578	28.240%	227,784,000	2.342%	185,441,422	42,342,578	18.589%
Denmark	89,667,000	1.637%	79,712,000	9,955,000	11.102%	69,577,000	1.637%	49,928,455	19,648,545	28.240%	159,244,000	1.637%	129,640,455	29,603,545	18.590%
Finland	69,786,000	1.274%	62,039,000	7,747,000	11.101%	54,151,000	1.274%	38,858,758	15,292,242	28.240%	123,937,000	1.274%	100,897,758	23,039,242	18.589%
Norway	69,786,000	1.274%	62,039,000	7,747,000	11.101%	54,151,000	1.274%	38,858,758	15,292,242	28.240%	123,937,000	1.274%	100,897,758	23,039,242	18.589%
Bulgaria	62,459,000	1.140%	55,526,000	6,933,000	11.100%	48,465,000	1.140%	34,778,484	13,686,516	28.240%	110,924,000	1.140%	90,304,484	20,619,516	18.589%
Romania	59,914,000	1.094%	53,264,000	6,650,000	11.099%	46,490,000	1.094%	33,361,224	13,128,776	28.240%	106,404,000	1.094%	86,625,224	19,778,776	18.588%
Switzerland	53,824,000	0.983%	43,229,000	10,595,000	19.685%	41,765,000	0.983%	29,970,564	11,794,436	28.240%	95,589,000	0.983%	73,199,564	22,389,436	23.423%
Ireland	48,310,000	0.882%	42,948,000	5,362,000	11.099%	37,486,000	0.882%	26,899,954	10,586,046	28.240%	85,796,000	0.882%	69,847,954	15,948,046	18.588%
Hungary	44,788,000	0.818%	39,816,000	4,972,000	11.101%	34,753,000	0.818%	24,938,753	9,814,247	28.240%	79,541,000	0.818%	64,754,753	14,786,247	18.589%
Czech Republic	43,037,000	0.786%	38,260,000	4,777,000	11.100%	33,395,000	0.786%	23,964,252	9,430,748	28.240%	76,432,000	0.786%	62,224,252	14,207,748	18.589%
Luxembourg	34,734,000	0.634%	30,878,000	3,856,000	11.102%	26,952,000	0.634%	19,340,755	7,611,245	28.240%	61,686,000	0.634%	50,218,755	11,467,245	18.590%
Serbia	25,841,000	0.472%	22,973,000	2,868,000	11.099%	20,051,000	0.472%	14,388,598	5,662,402	28.240%	45,892,000	0.472%	37,361,598	8,530,402	18.588%
Croatia	21,376,000	0.390%	19,003,000	2,373,000	11.101%	16,587,000	0.390%	11,902,831	4,684,169	28.240%	37,963,000	0.390%	30,905,831	7,057,169	18.590%
Cyprus	19,882,000	0.363%	17,676,000	2,206,000	11.095%	15,427,000	0.363%	11,070,415	4,356,585	28.240%	35,309,000	0.363%	28,746,415	6,562,585	18.586%
Slovak Republic	18,959,000	0.346%	16,854,000	2,105,000	11.103%	14,711,000	0.346%	10,556,614	4,154,386	28.240%	33,670,000	0.346%	27,410,614	6,259,386	18.590%
Albania	13,385,000	0.244%	11,899,000	1,486,000	11.102%	10,386,000	0.244%	7,452,994	2,933,006	28.240%	23,771,000	0.244%	19,351,994	4,419,006	18.590%
Latvia	12,808,000	0.234%	11,387,000	1,421,000	11.095%	9,938,000	0.234%	7,131,509	2,806,491	28.240%	22,746,000	0.234%	18,518,509	4,227,491	18.586%
Estonia	12,723,000	0.232%	11,311,000	1,412,000	11.098%	9,872,000	0.232%	7,084,147	2,787,853	28.240%	22,595,000	0.232%	18,395,147	4,199,853	18.588%
North Macedonia	12,723,000	0.232%	11,311,000	1,412,000	11.098%	9,872,000	0.232%	7,084,147	2,787,853	28.240%	22,595,000	0.232%	18,395,147	4,199,853	18.588%
Lithuania	12,588,000	0.230%	11,191,000	1,397,000	11.098%	9,768,000	0.230%	7,009,517	2,758,483	28.240%	22,356,000	0.230%	18,200,517	4,155,483	18.588%
Slovenia	12,295,000	0.224%	10,930,000	1,365,000	11.102%	9,540,000	0.224%	6,845,904	2,694,096	28.240%	21,835,000	0.224%	17,775,904	4,059,096	18.590%
Iceland	10,144,000	0.185%	9,018,000	1,126,000	11.100%	7,871,000	0.185%	5,648,230	2,222,770	28.240%	18,015,000	0.185%	14,666,230	3,348,770	18.589%
Malta	10,144,000	0.185%	9,018,000	1,126,000	11.100%	7,871,000	0.185%	5,648,230	2,222,770	28.240%	18,015,000	0.185%	14,666,230	3,348,770	18.589%
Georgia	9,876,000	0.180%	8,780,000	1,096,000	11.098%	7,663,000	0.180%	5,498,969	2,164,031	28.240%	17,539,000	0.180%	14,278,969	3,260,031	18.587%
Bosnia Herzegovina	9,689,000	0.177%	8,614,000	1,075,000	11.095%	7,518,000	0.177%	5,394,917	2,123,083	28.240%	17,207,000	0.177%	14,008,917	3,198,083	18.586%
Montenegro	6,584,000	0.120%	5,853,000	731,000	11.103%	5,109,000	0.120%	3,666,218	1,442,782	28.240%	11,693,000	0.120%	9,519,218	2,173,782	18.590%
Kosovo	6,559,000	0.120%	5,831,000	728,000	11.099%	5,089,000	0.120%	3,651,866	1,437,134	28.240%	11,648,000	0.120%	9,482,866	2,165,134	18.588%
Moldova	5,488,000	0.100%	4,878,000	610,000	11.115%	4,258,000	0.100%	3,055,541	1,202,459	28.240%	9,746,000	0.100%	7,933,541	1,812,459	18.597%
Andorra	4,925,000	0.090%	4,378,000	547,000	11.107%	3,822,000	0.090%	2,742,667	1,079,333	28.240%	8,747,000	0.090%	7,120,667	1,626,333	18.593%
San Marino	4,867,000	0.089%	4,206,000	661,000	13.581%	3,777,000	0.089%	2,710,375	1,066,625	28.240%	8,644,000	0.089%	6,916,375	1,727,625	19.986%
Liechtenstein	2,921,000	0.053%	2,374,000	547,000	18.726%	2,267,000	0.053%	1,626,799	640,201	28.240%	5,188,000	0.053%	4,000,799	1,187,201	22.884%
Holy See	137,000	0.003%	107,000	30,000	21.898%	106,000	0.003%	76,066	29,934	28.240%	243,000	0.002%	183,066	59,934	24.664%
Total	**5,477,144,000**	**100.000%**	**4,864,180,000**	**612,964,000**	**11.191%**	**4,249,996,000**	**100.000%**	**3,049,797,133**	**1,200,198,867**	**28.240%**	**9,727,140,000**	**100.000%**	**7,913,977,133**	**1,813,162,867**	**18.640%**

* Situation after capital increase assuming all countries subscribe