



# Annual Management Report

A Subsection of the Annual Report

For the Year Ended September 30, 2025



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# **Management's Discussion and Analysis of Results of Operations and Financial Condition**

## **EXECUTIVE SUMMARY**

The Export-Import Bank of the United States (EXIM) is the official export credit agency of the United States. EXIM is an independent agency and a wholly owned U.S. government corporation with the mission of supporting jobs in the United States by facilitating the exports of U.S. goods and services. In FY 2020, the *Export-Import Bank Extension* (P.L.116-94, Div. I, Title IV) reauthorized EXIM for seven years - through December 31, 2026.

When private-sector lenders are unable or unwilling to provide financing, EXIM fills in the gap for American businesses by offering financing programs. Additionally, EXIM levels the playing field for the export of U.S. goods and services competing against export credit agency (ECA)-supported financing in foreign markets so that American companies can create and maintain American jobs.

During the year ended September 30, 2025, EXIM authorized \$8,743.8 million of direct loans, loan guarantees, and insurance in support of an estimated \$10,129.9 million of U.S. export sales.

Small business authorizations in FY 2025 totaled \$1,697.8 million, representing 19.4 percent of total authorizations. In FY 2025, 1,168 transactions were authorized for the direct benefit of small business exporters, which amounted to 87.7 percent of total transactions count.

EXIM currently has global exposure in 138 countries and markets. Total portfolio exposure increased by 2.0 percent to \$34,795.8 million as of September 30, 2025 compared to \$34,117.4 as of September 30, 2024.

EXIM's Charter requires that all authorized transactions demonstrate a reasonable assurance of repayment. The September 30, 2025 default rate, as reported to Congress, was 1.023 percent, which remains well below the 2.0% statutory limitation established in EXIM's Charter. The default rate slight increase is driven primarily by a decline in total financing outstanding rather than a material increase in defaults.

Since FY 1992, when the Federal Credit Reform Act of 1990 (FCRA) became effective, EXIM has sent a net \$9.8 billion to the U.S. Treasury for repayment of U.S. debt. EXIM is also partially a self-financing agency. EXIM collects funds from credit program customers which are used to offset or pay-back EXIM appropriations.

## I. GENERAL OVERVIEW

### AUTHORITY, MISSION, AND CHARTER

The Export-Import Bank of the United States (EXIM) is an independent agency and a wholly owned U.S. government corporation that was first organized as a District of Columbia banking corporation in 1934. EXIM was founded on February 2, 1934, by President Roosevelt as a new economic tool to boost the economy and support U.S. exporters and jobs across the nation. Over its 90-year plus history, EXIM has provided a variety of financing tools to empower American exporters and helped bring multiple historic international projects, including the Marshall Plan, the Burma Road, the Pan American Highway, and the Panama Canal, into reality.

EXIM is the official export credit agency of the United States. EXIM's operations subsequent to September 30, 1991, are subject to the provisions of the Federal Credit Reform Act (FCRA), which became effective October 1, 1991.

The mission of EXIM is to support U.S. exports by providing export financing through its direct loan, guaranteed loan, and export credit insurance programs in cases where the private sector is unable or unwilling to provide financing, or where such support is necessary to level the competitive playing field for U.S. exporters due to financing provided by foreign governments to their exporters. In pursuit of its mission of supporting U.S. exports, EXIM offers four major financial products: loan guarantees, working capital guarantees, direct loans, and export credit insurance. All EXIM obligations carry the full faith and credit of the U.S. government.

In accordance with its Charter (*the Export-Import Bank Act of 1945, as amended*<sup>1</sup>), continuation of EXIM's functions in furtherance of its objectives and purposes is subject to periodic extensions granted by Congress. In December 2019, The *Export-Import Bank Extension* (P.L.116-94, Div. I, Title IV) fully reauthorized EXIM through December 31, 2026. EXIM's Charter requires reasonable assurance of repayment for the transactions EXIM authorizes, and EXIM closely monitors credit and other risks in its portfolio. Additional provisions contained in the amended Charter include a program on China and Transformational Exports and related reporting, an increase to the small business threshold, as well as alternative procedures to follow during a lapse of quorum on the Board of Directors.

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<sup>1</sup> Available at <https://www.exim.gov/leadership-governance/charter-and-bylaws> and codified at 12 U.S.C. 635 et seq.

## ORGANIZATIONAL PERFORMANCE

EXIM's Strategic Plan, updated every four years in alignment with the GPRA Modernization Act of 2010 and OMB Circular A-11 Part 6, defines the agency's long-term goals, strategies to achieve them, and approaches for managing risks and challenges. It ensures EXIM fulfills its mission, complies with its Charter, and meets congressional mandates. Current and past Strategic Plans are publicly available at <https://www.exim.gov/leadership-governance/strategic-plans>.

EXIM's Annual Performance Plan (APP) sets annual performance goals, indicators, and milestones that support strategic objectives. The Annual Performance Report (APR) provides a transparent, evidence-based comparison of actual results against these goals, explains variances, and outlines corrective actions.

In FY 2025, EXIM continued progress toward its strategic objectives, leveraging resources to expand U.S. exports and support American jobs. Key performance trends, challenges, and risk mitigation strategies are discussed in the APR. Current and past APPs and APRs are available at <https://www.exim.gov/leadership-governance/strategic-plans>.

## EXIM'S PROGRAMS

EXIM's export financing programs facilitate and support U.S. exports through three major programs: loan guarantees, direct loans, export credit insurance.

Each of these programs has an associated term: short-, medium-, or long-term. Loans and guarantees extended under the medium-term program typically have repayment terms of one to seven years, while loans and guarantees extended under the long-term program usually have repayment terms in excess of seven years. Short-term financing consists of transactions with terms of one year or less.

| Program Term | Repayment Terms |
|--------------|-----------------|
| Short-Term   | ≤ 1 year        |
| Medium-Term  | 1-7 years       |
| Long-Term    | ≥ 7 years       |

## **LOAN GUARANTEE PROGRAM**

[\(https://www.exim.gov/solutions/loan-guarantee\)](https://www.exim.gov/solutions/loan-guarantee)

EXIM loan guarantees cover the repayment risks on the foreign buyer's debts when purchasing U.S. exports. EXIM guarantees to a commercial lender that, in the event of a payment default by the borrower, it will pay to the lender the outstanding principal and interest on the loan. For medium- and long-term transactions, EXIM generally provides an 85 percent (85%) guarantee, with a 15 percent (15%) down payment from the buyer. Short-term loan guarantee transactions are offered under the Working Capital Guarantee Program, described below.

## ***WORKING CAPITAL GUARANTEE PROGRAM (WCGP)***

[\(https://www.exim.gov/what-we-do/working-capital\)](https://www.exim.gov/what-we-do/working-capital)

An offering under the Loan Guarantee Program in which EXIM provides repayment guarantees to lenders on secured, short-term working capital loans made to qualified exporters. The working capital guarantee may be approved for a single loan or a revolving line of credit. For working capital guarantees, EXIM generally provides a 90 percent (90%) loan-backing guarantee to the lender.

## **DIRECT LOAN PROGRAM**

[\(https://www.exim.gov/what-we-do/direct-loan\)](https://www.exim.gov/what-we-do/direct-loan)

EXIM offers fixed-rate loans directly to foreign buyers of U.S. goods and services. EXIM extends to a company's foreign customer a fixed-rate loan generally covering up to 85 percent (85%) of the U.S. contract value. The fixed-interest rates are determined through the Arrangement on Guidelines for Officially Supported Export Credits (the Arrangement) negotiated among members of the Organization for Economic Co-operation and Development (OECD).

## **EXPORT CREDIT INSURANCE**

[\(https://www.exim.gov/what-we-do/export-credit-insurance\)](https://www.exim.gov/what-we-do/export-credit-insurance)

EXIM's Export Credit Insurance Program supports U.S. exporters by insuring them against the risk of foreign buyer or other foreign debtor default for political or commercial reasons.

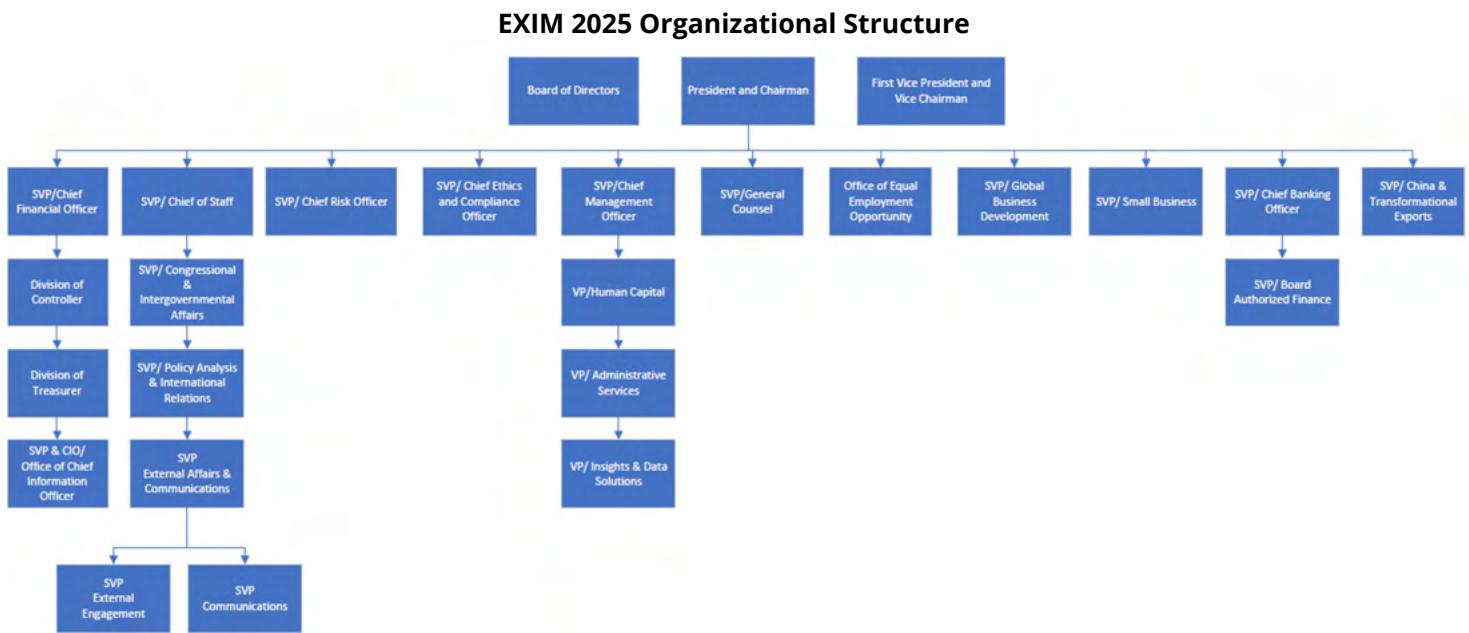
This risk protection permits exporters to extend credit to their international customers where it would otherwise not be possible. Insurance policies may apply to shipments to one or multiple buyers, insure comprehensive credit risks (including both commercial and political) or only political risks, offer either short-term or medium-term coverage, and are primarily U.S.-dollar transactions.

## II. ORGANIZATIONAL STRUCTURE

EXIM's headquarters is located in Washington, D.C., with business-development efforts supported through 12 regional offices across the country.

With decades of experience around the globe, the leaders of EXIM are uniquely equipped to support U.S. companies as they seek to fill orders abroad.

EXIM's governance structure is illustrated in the organizational chart below:



### III. FY 2025 PERFORMANCE AND RESULTS

#### TOTAL AUTHORIZATIONS

EXIM provides financing to facilitate U.S. exports and support jobs by either offering competitive rates and terms against other foreign ECAs or by filling financing gaps when private lenders are unable or unwilling to provide support for U.S. goods and services.

In implementing this mandate, EXIM approved \$8,743.8 million in total authorizations in FY 2025. The FY 2025 authorizations supported an estimated U.S. export value (the total dollar value of exports related to EXIM's authorized financing) of \$10,129.9 million. See Exhibit 1 for a breakdown of FY 2025 authorizations by term and program.

Exhibit 1: Authorizations by Term and Program

|                              | FY 2025                     |                        |
|------------------------------|-----------------------------|------------------------|
|                              | Authorized<br>(in millions) | As percent<br>of total |
| <b>Long-Term</b>             |                             |                        |
| Loans                        | \$ 1,336.2                  | 15.3%                  |
| Guarantees                   | 3,694.2                     | 42.2%                  |
| <b>Subtotal, Long Term</b>   | <b>5,030.4</b>              | <b>57.5%</b>           |
| <br><b>Medium-Term</b>       |                             |                        |
| Guarantees                   | 169.4                       | 2.0%                   |
| Insurance                    | 37.5                        | 0.4%                   |
| <b>Subtotal, Medium-Term</b> | <b>206.9</b>                | <b>2.4%</b>            |
| <br><b>Short-Term</b>        |                             |                        |
| Guarantees                   | 1,083.7                     | 12.4%                  |
| Insurance                    | 2,422.8                     | 27.7%                  |
| <b>Subtotal, Short-Term</b>  | <b>3,506.5</b>              | <b>40.1%</b>           |
| <b>Total Authorizations</b>  | <b>\$ 8,743.8</b>           | <b>100.0%</b>          |

**Long-term transactions:** Long-term transactions require extensive credit assessments performed by underwriters with subject-matter expertise before being considered for approval. Evaluations assess key transactional risks such as the borrower's industry, competitive position, operating performance, liquidity position, leverage, ability to service debt obligations, and others.

Frequently, credit enhancements are included in the structure of long-term financing (often in the form of collateral) to decrease the risk of a borrower default and increase recoveries in the event of default. A risk rating is assigned to the transaction based on this evaluation which, in turn, assists in establishing the level of loss reserves EXIM must set aside.

**Short-term and medium-term transactions:** These transactions are largely approved under individual delegated authority granted by the Board of Directors to EXIM staff and commercial banks pursuant to prescribed credit standards and information requirements. Governance and control procedures employed include periodic credit and compliance reviews, the results of which are provided to senior management and to the Board of Directors.

## CONGRESSIONAL MANDATES

In accordance with the EXIM Charter, EXIM operates under various congressional mandates. Fiscal year results are fundamental indicators of operational performance under such mandates, which are referred to as:

- 1. Small Business Mandate** (Section 2(b)(1)(E)(v)): The Charter states that not less than 30 percent of the aggregate loan, guarantee, and insurance authority available to EXIM for each fiscal year should be made available to finance exports directly by small business concerns.
- 2. Sub-Saharan Africa Mandate** (Section 2(b)(9)(A)): The Charter directs the Board of Directors of EXIM to take measures, consistent with the credit standards otherwise required by law, to promote the expansion of EXIM's financial commitments in sub-Saharan Africa under the loan, guarantee, and insurance programs of EXIM.
- 3. Environmentally Beneficial and Renewable Energy Mandate** (Section 11(b)(1) and 2(b)(1)(K)): The Charter states that EXIM shall encourage the use of its programs to support the export of goods and services that have beneficial effects on the environment or mitigate potential adverse environmental effects. EXIM shall also promote the export of goods and services related to renewable-energy, energy efficiency, and energy storage sources with a goal to ensure that not less than 5 percent of the agency's total financing authority, or \$6,750.0 million is made available each fiscal year for such exports.
- 4. Program on China and Transformational Exports Mandate** (Section 2(l)): The Charter directs EXIM to establish a new program to support the extension of loans, guarantees, and insurance, at rates and on terms and other conditions, to the extent practicable, that are fully competitive with rates, terms, and other conditions established by the People's Republic of China or by other covered countries. EXIM's goal is to reserve 20.0 percent of the agency's total financing authority, or \$27.0 billion, for support made pursuant to the program.

## SMALL BUSINESS MANDATE

EXIM programs play an important role in providing export finance support to small businesses that have the ability to expand and create American jobs. EXIM provides export finance solutions to U.S. small businesses, particularly those companies with fewer than 100 employees or that have been traditionally underserved. Small businesses are major job creators in the United States, and Congress places significant emphasis on supporting small business exports by mandating the amount of EXIM's authority that will be made available to small businesses every fiscal year.

In 1978, EXIM introduced its first short-term export credit insurance policy tailored for small businesses, and then in 1983, Congress enacted a mandate which stipulated the amount of financing authority that is to be made available for small businesses, which began at 6.0 percent in 1984 and rose to 10.0 percent in 1986. The mandate was increased in 2002 to 20 percent, and in December 2015 (FY 2016) to 25 percent. Effective January 2021, the mandate again increased to 30 percent.

EXIM's Office of Small Business provides an agency-wide focus on small business support with overall responsibility for expanding and overseeing small business outreach. This group is responsible for helping to provide small businesses with financial assistance to increase export sales and for acting as a liaison with the Small Business Administration and other departments and agencies in the U.S. government in matters affecting small businesses. EXIM continues to innovate, design, and implement products and policies to meet the needs of the U.S. small business exporter.

### *FY 2025 Small Business Authorizations*

EXIM's objective is to increase small business authorizations consistent with all applicable statutory and policy requirements. In FY 2025, EXIM had sufficient financing authority for all qualified small business applications.

Small business authorizations were \$1,697.8 million in FY 2025. In FY 2025, small business authorizations represented 19.4 percent of total authorizations and 28.1 percent of the direct export value EXIM supported.

During FY 2025, the number of transactions that were executed for the direct benefit of small business exporters was 1,168 or 87.7 percent of the total number of transactions. Of the small business transactions authorized in FY 2025, 625 of these transactions were less than \$500,000. In FY 2025, 110 new small business exporters used EXIM small business products for the first time.

**28.1%** of total direct export  
value supported in FY 2025 was for  
small business

**87.7%** of EXIM transaction count  
directly benefited U.S. small business  
exporters

EXIM offers two products that are primarily used by small businesses: working capital guarantees and export credit insurance. In FY 2025, \$379.8 million, or 72.2 percent, of total authorizations in the Working Capital Guarantee Program supported exports from small businesses. Of the total authorizations under the export credit insurance program in FY 2025, 43.8 percent, or \$1,077.6 million, supported exports from small businesses.

EXIM also works to support the unique needs of minority-owned and women-owned businesses providing hands-on guidance on how to qualify for and access EXIM financing in order to grow their exports. Through this effort, minority-owned and women-owned businesses accounted for \$350.7 million of authorizations in FY 2025. Of the \$350.7 million, \$335.5 million are in direct benefit of exports from small businesses.

#### **SUB-SAHARAN AFRICA MANDATE**

EXIM provides U.S. exporters with the financing tools they need to successfully compete for business across all regions of Africa, including high-risk and emerging markets.

Pursuant to its Charter, EXIM has established the Sub-Saharan Africa Advisory Committee. The committee members advise EXIM and the Board of Directors on the development and implementation of policies and programs designed to support EXIM's engagement in sub-Saharan Africa, with a focus on boosting American exports and bolstering U.S. jobs.

#### ***FY 2025 Sub-Saharan Africa Authorizations***

In FY 2025, sub-Saharan Africa dollar authorizations represented 8.4 percent, or \$736.4 million of total authorizations. Sub-Saharan Africa authorizations represented 51 transactions, or 3.8 percent, of EXIM's transaction total count in FY 2025.

#### **ENVIRONMENTALLY BENEFICIAL GOODS AND SERVICES MANDATE**

EXIM fills the financing gap to support competitive financing for U.S. exports while also maintaining environmental responsibility. As required by Congress in 1992, EXIM adopted environmental procedures and guidelines to assess the environmental impacts of projects seeking EXIM financing and was the first ECA to adopt such procedures. In addition to EXIM's environmental and social due diligence, EXIM financing supports renewable and other environmentally beneficial U.S. exports as required by its Charter.

EXIM financing helps mitigate risk for U.S. companies that offer environmentally beneficial goods and services and also offers competitive financing terms to international buyers for the purchase of these U.S.-made environmental goods and services. EXIM has an active portfolio that includes financing for U.S. exports of:

- Renewable-energy equipment
- Wastewater-treatment projects
- Air-pollution technologies
- Waste-management services
- Other various environmental goods and services

EXIM financing for environmentally beneficial exports supports U.S. jobs in this innovative sector and promotes U.S. companies the ability to compete with globally competitive financing terms.

#### *FY 2025 Environmentally Beneficial Authorizations*

In FY 2025, EXIM authorizations of environmentally beneficial goods and services totaled \$456.1 million, and approximately 5.2 percent of EXIM's FY 2025 authorizations. Renewable-energy, energy efficiency, and energy storage authorizations are subsets of EXIM's environmentally beneficial authorizations. In FY 2025, 16 transactions in these subsets were authorized, totaling \$356.5 million.

#### **PROGRAM ON CHINA AND TRANSFORMATIONAL EXPORTS MANDATE**

In the Export-Import Bank Extension<sup>2</sup> passed in 2019, Congress directed EXIM to establish a Program on China and Transformational Exports (CTEP) (Charter Section 2(l)). The central purpose of the program is to support extensions of export credit and insurance that are fully competitive, to the extent practicable, with those provided by China to:

1. Directly neutralize export subsidies for competing goods and services financed by official export credit, tied aid, or blended financing provided by China or by other covered countries.
2. Advance the comparative leadership of the United States with respect to China, or support United States innovation, employment, and technological standards, through direct exports in 10 transformative areas, plus any associated services. The ten transformation areas are as follows:
  - Artificial intelligence
  - Biotechnology
  - Biomedical sciences
  - Wireless communications equipment
  - Quantum computing
  - Renewable energy, energy efficiency, and energy storage
  - Semiconductor and semiconductor machinery manufacturing
  - Emerging financial technologies
  - Water treatment and sanitation
  - High-performance computing

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<sup>2</sup> P.L. 116-94, Division I, Title IV

## *FY 2025 China and Transformational Exports Authorizations*

EXIM is mandated with a goal of reserving not less than 20 percent of the agency's total financing authority, or \$27.0 billion out of the total of EXIM's \$135.0 billion lending limit, for support made pursuant to this mandate. In FY 2025 \$2,055.1 million was authorized in direct support of this program, or 23.5 percent of total authorizations.

## **IV. EXIM'S SELF-FINANCING STATUS**

EXIM is considered a self-financing agency, which means that EXIM collects funds from credit program customers and uses these funds to offset, or pay-back, EXIM's appropriation to the U.S. Treasury. EXIM collects commitment and exposure fees as well as interest and first sets aside funds to maintain prudent loan loss reserves. Any additional collections made in excess of the amounts used to pay back EXIM's appropriations are sent to the U.S. Treasury and offset federal debt.

In FY 2025, through its annual appropriation, EXIM had authority to obligate \$125.0 million for administrative costs.<sup>3</sup> EXIM self-financed, or paid back, \$76.9 million of these costs with offsetting collections from its credit programs while the remaining \$48.1 million was covered by the annual appropriation. Increasing transaction levels provide for additional fee and interest collections that will assist EXIM in regaining full self-financing status.

In FY 2025 EXIM also received a \$15.0 million program budget appropriation for the cost of direct loans, loan guarantees, and insurance, which is available for obligation until September 30, 2028<sup>4</sup>.

Since FY 1992, when FCRA became effective, EXIM has generated \$9.8 billion in revenues for U.S. taxpayers after providing for expenses, loan-loss reserves, and administrative costs.

**Since 1992, EXIM has sent \$9.8 billion to the U.S. Treasury to offset the federal debt**

## **V. RISK MANAGEMENT**

Pursuant to its charter, EXIM's Enterprise Risk Committee (ERC) is responsible for reviewing, evaluating, educating, coordinating, and making recommendations to the Chief Risk Officer, the EXIM President, and senior management on financial, credit, legal, operational, reputational, and other key risks including EXIM policies related to those risks.

EXIM manages its key risks through an integrated, enterprise risk-management program that includes identifying, prioritizing, measuring, monitoring, and managing agency risks in a holistic, entity-wide manner.

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<sup>3</sup> Full-Year Continuing Appropriations and Extensions Act, 2025 (P.L. 119-4, Div. A, 139 STAT 12)

<sup>4</sup> Full-Year Continuing Appropriations and Extensions Act, 2025 (P.L. 119-4, Div. A, 139 STAT 12)

## PROTECTING THE U.S. TAXPAYER

EXIM is assuming and managing country and credit risks to facilitate U.S. exports that the private sector is unable or unwilling to support. One of EXIM's core responsibilities is to minimize, through the diligent application of prudent lending principles, the risk of loss to the United States taxpayer arising from its credit activities. EXIM continues its prudent oversight and due-diligence standards to protect taxpayers through its comprehensive risk-management framework.

### The Interagency Country Risk Assessment System (ICRAS)

FCRA requires a standardized country risk assessment for all U.S. government agencies engaged in credit activities. In 1992 the Office of Management and Budget (OMB) established the Interagency Country Risk Assessment System (ICRAS), which risk rates a country's willingness and ability to repay its debt and provides a framework for uniformly measuring the costs of the U.S. government's cross-border risk credit programs across the various agencies that administer them. To operate this framework, OMB chairs an interagency working group composed of the agencies with international loan programs.<sup>5</sup> One of OMB's key goals in developing this system was to pattern ICRAS after rating systems in the private sector. While there are some differences, ICRAS adopts similar ratings and rating methodologies as the commercial rating agencies, such as those rating systems used by Moody's Investor Service, S&P Global Ratings, and Fitch Ratings.

EXIM is the Secretariat for ICRAS, pursuant to which EXIM's country economists prepare reports containing an assessment of country risk and risk rating recommendations for review and approval by the interagency working group. The ICRAS system provides a separate country risk rating for public sovereign borrowers and for non-sovereign/private sector borrowers, respectively. ICRAS currently has risk ratings for 206 sovereign and 208 nonsovereign markets.

EXIM's Board has established a linkage of these risk rating results to whether a given market meets EXIM's statutory requirement of reasonable assurance of repayment for approval of transactions and thus whether it is open or closed for business.

EXIM's Board of Directors, or EXIM officer(s) acting pursuant to delegated authority from the Board of Directors, makes the final determination of reasonable assurance of repayment for transactions, taking into consideration staff recommendations. Transactions require the approval of the Board of Directors directly or through delegated authority. For transactions, EXIM's comprehensive risk management includes detailed documentation to ensure EXIM's rights are protected legally, and that the transaction is not in violation of U.S. government policy or sanctions.

## PORTFOLIO-RISK RATING SYSTEM AND RISK PROFILE

Risk management continues after a transaction is approved with proactive monitoring efforts to minimize defaults and losses. This comprehensive risk-management framework minimizes defaults and claims and maximizes value to the taxpayer. EXIM engages in robust portfolio management, as well as oversight and governance, including maintaining adequate loss reserves to cover expected loss.

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<sup>5</sup> Including the Departments of State, Treasury, Agriculture, Commerce, Defense, U.S. International Development Finance Corporation, the Federal Reserve, and EXIM

Risk management processes that are performed after a transaction is approved encompass the following:

- Proactively managing individual transactions in EXIM's portfolio with a focus on the financial condition of the primary source of repayment;
- Assessing the use, maintenance, and condition of mortgaged collateral, as applicable;
- Actively managing operative phase matters, including any requested or necessary amendments, waivers and consents, and, if applicable, restructurings.

EXIM seeks to maintain an appropriate balance between meeting the needs of the borrower and primary source of repayment and protecting the United States taxpayer through preserving the value of both EXIM's collateral and assets, and its legal rights. Transactional risk management staff ensure that senior management is apprised of the performance of the portfolio through regular reporting and presentations to ERC. In addition, the financial condition for each borrower and primary source of repayment is monitored on a continuing basis. The risk-rating system is discussed in detail below.

#### **Exposure-Risk Profile and Budget Cost Level**

Corresponding with the ICRAS risk-rating system noted above, EXIM classifies medium-and long-term credits into 11 risk categories, with level 1 being the lowest risk and 11 being the riskiest. Each level in this scale is referred to as a Budget Cost Level, or BCL. The purpose of the BCL is to determine the repayment risk or expected loss for each transaction, with the rating reflecting EXIM's assessment of the risk of the transaction at the time of authorization.

BCL 1 through 4 are considered "investment grade" ratings and are the equivalent of S&P's BBB- or better ratings. BCL 5 or worse are considered "speculative grade," equivalent to a BB+ or BB or worse. EXIM generally does not authorize new credits that would be risk-rated with a BCL worse than an 8.

The overall weighted-average risk rating of EXIM's portfolio is above a BCL 4. The overall weighted-average risk rating for rated export credit authorizations made in FY 2025 was 5.2. For FY 2025, 38.5 percent of EXIM's rated new authorizations were in the level 1 to 4 range (AAA to BBB-) while 61.5 percent were rated level 5 to 9 (BB+ to CCC<sup>6</sup>).

#### **Changes in Portfolio-Risk Level**

On September 30, 2025, EXIM had a portfolio exposure of \$34,795.8 million of loans, guarantees, insurance, and outstanding claims receivable. The portfolio includes new and existing credits whose risk ratings and loss reserves are reviewed and adjusted, if needed, at least annually. The weighted average risk rating for the total portfolio exposure was at BCL 5.9 in FY 2025, which concords with a BB or Ba3.

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<sup>6</sup> CCC risk- rated new authorizations generally apply to select high-risk transactions, typically limited to a repayment term of 180 days or less, and not to exceed 360 days.

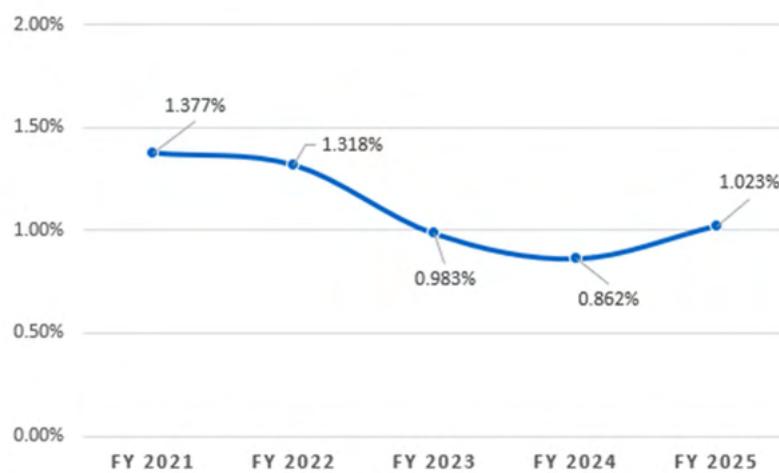
## DEFAULT RATE

Pursuant to its Charter, EXIM is mandated to report to Congress on a quarterly basis the current default rate on its active portfolio. This rate reflects a “total amount of required payments that are overdue” (claims paid on guarantees and insurance transactions plus loans past due) divided by a “total amount of financing involved” (disbursements). Currently, EXIM is required to maintain a default rate below two percent to avoid a freeze on its lending cap. If the rate is two percent or more for a reporting quarter, EXIM may not exceed the amount of loans, guarantees, and insurance outstanding on the last day of that quarter, until the rate is less than 2 percent again. On September 30, 2025, the reported default rate was 1.023 percent.

**1.023% Default Rate**

Exhibit 2 below shows the trend of EXIM’s default rate over the last five years. The higher default rate in FY 2021 was primarily attributable to the COVID-19 crisis, as the pandemic adversely affected certain borrowers and industries. In FY 2022, the default rate stabilized as EXIM worked with borrowers to implement restructurings and other workout actions to address liquidity pressures stemming from the pandemic. During FY 2023, the rate began to decline due to repayments and recoveries, and in FY 2024 the rate continued to trend downward, reflecting relatively low defaults and the roll-off of older transactions and legacy defaults from the active portfolio. In FY 2025, the default rate increased modestly, driven primarily by a decline in total financing outstanding rather than a material increase in defaults.

Exhibit 2: Default Rate (Five-Year Trend)



## IMPAIRED CREDITS AND PARIS CLUB ACTIVITIES

### Impaired Credits

Impaired Credits are defined as those transactions risk rated as BCL 9 to 11 and are on the verge of default due to political, commercial, operational, and/or technical events or unforeseeable circumstances which have affected the borrower's ability to service repayment of EXIM credits.

### Paris Club Activities

The Paris Club is a group of 22 permanent member-creditor countries that meets to discuss and provide debt relief to qualifying debtor countries. The U.S. Treasury and State Department represent the United States and the interests of all U.S. agencies that hold international debt, such as EXIM. Paris Club debt relief can come in the form of rescheduling, or a reduction or suspension in payments for a certain period or a certain date.

In FY 2025 no country received Paris Club treatment of EXIM debt in the form of principal forgiven.

## EFFECTIVENESS AND EFFICIENCY

EXIM uses various measures to assess the relative efficiency and effectiveness of its programs. EXIM's annual *Report to the U.S. Congress on Global Export Credit Competition* (the "Competitiveness Report") compares EXIM's competitive performance with that of other ECAs. When combining the Competitiveness Report with internal efficiency measurements, management assesses the effectiveness of EXIM's operations.

The 2024 Competitiveness Report,<sup>7</sup> released in 2025 for the calendar year from January 1, 2024, to December 31, 2024, titled "Global Export Credit Competition," focuses on the increase in support that was tied to exports as ECAs, as well as the evolution of untied support from one-off transactions that respond to specific mandates, to a widely available product leveraged for many purposes.

## VI. PORTFOLIO

An efficient and effective risk-management framework allows EXIM to recognize long-term fluctuations in the external risk environment and then pivot accordingly. Understanding how to pivot, however, requires an understanding of the distinct characteristics of EXIM's exposure around the world. As a result, EXIM management views the portfolio through a variety of lenses, each offering its own narrative, nuance, and interpretation.

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<sup>7</sup> <http://www.exim.gov/news/reports/competitiveness-reports>

## PERSPECTIVE-BASED ANALYSES

### Program, Region, Industry, and Foreign Currency

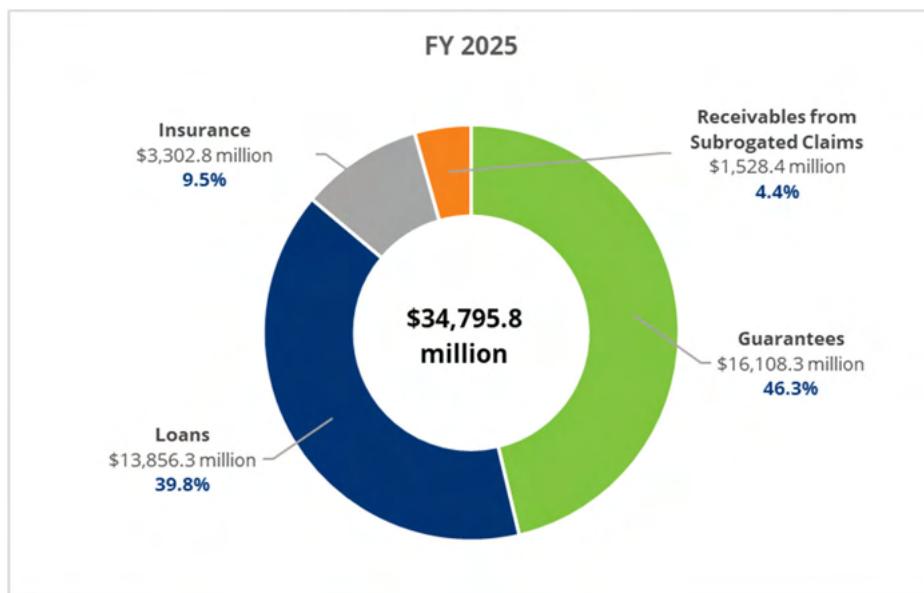
For both financial statement and analytical purposes, EXIM defines exposure as the outstanding (disbursed less any repayments) and undisbursed principal balance of loans, guarantees, and insurance, and also includes any unrecovered balances of payments made on claims submitted, and approved by EXIM. Exposure does not include accrued interest or transactions pending final approval. The claims payments are made by EXIM while acting as guarantor or insurer under the export guarantee and insurance programs.

### Program Exposure

EXIM currently has exposure totaling \$34,795.8 million as of September 30, 2025. Overall, portfolio exposure has slightly increased due to new authorizations exceeding repayments, including prepayments, on outstanding transactions.

Guarantees made up the largest portion, 46.3 percent, of EXIM's credit exposure as of September 30, 2025, followed closely by 39.8 percent of credit exposure under direct loans. Exhibit 3 summarizes total EXIM exposure by program for FY 2025.

Exhibit 3: Exposure by Program



## Regional and Top-Country Exposure

EXIM currently has exposure in 138 countries and markets. Exhibit 4 illustrates the geographic distribution of EXIM's total exposure, with more than half of exposure in FY 2025 spread across sub-Saharan Africa, Middle East and Northern Africa (MENA), and Europe, with these three regions amounting to \$20,852.5 million or 59.8 percent of EXIM's entire exposure. The "Other" region in Exhibit 4 includes undisbursed balances of short-term multi-buyer insurance that is not allocated by region until the shipment has taken place.

Management classifies exposure of regional country groupings of its loan, guarantee, and insurance portfolio to align EXIM's reporting with other entities with international exposure such as the World Bank, and the U.S. Treasury.

Exhibit 4: Regional Exposure

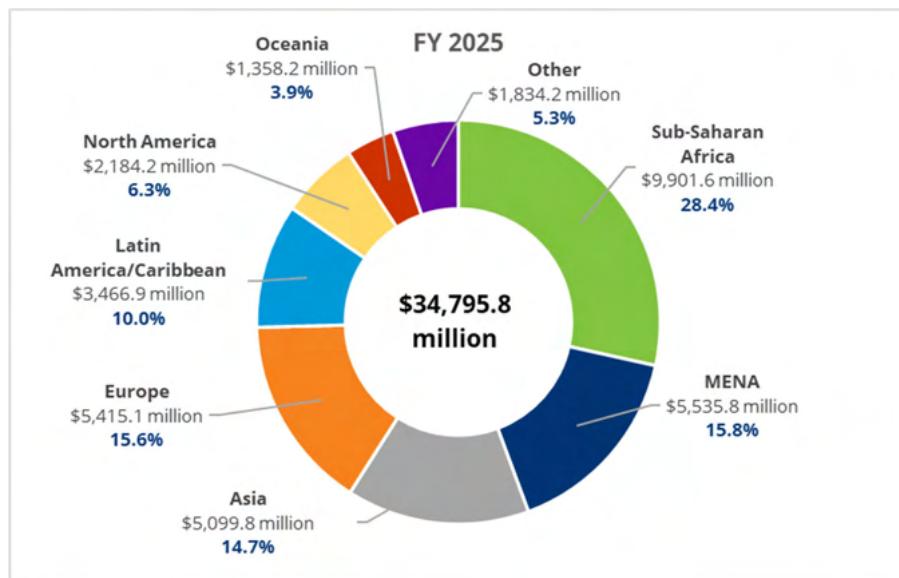
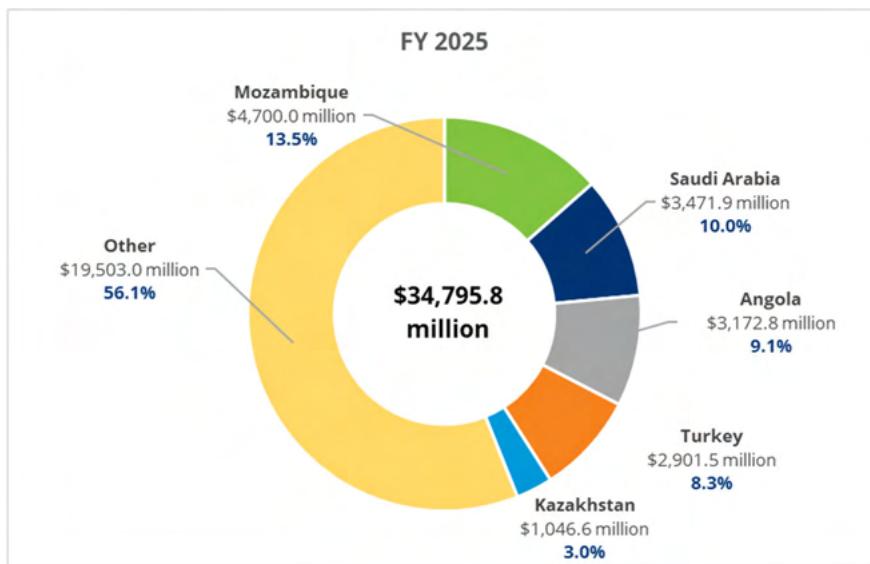


Exhibit 5 illustrates exposure for the top five countries as of September 30, 2025. These five countries make 43.9 percent of total exposure in FY 2025.

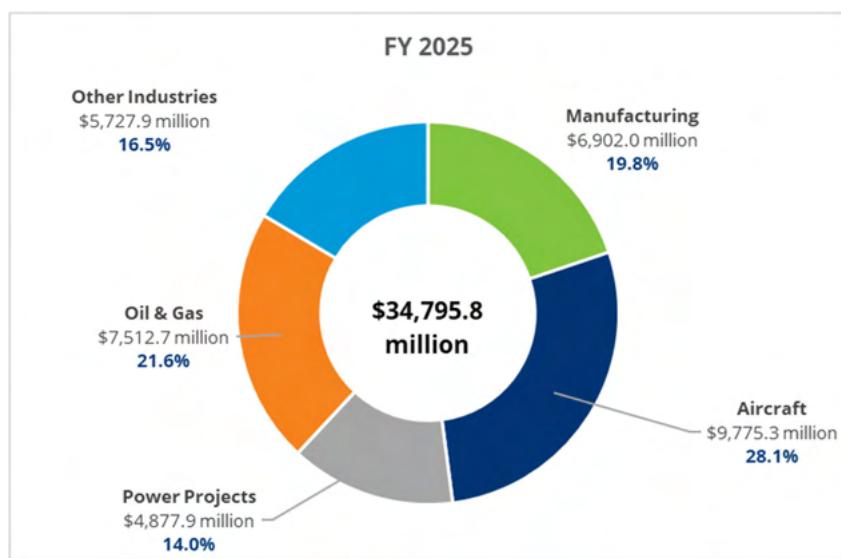
Exhibit 5: Top-Country Exposure



### Industry Exposure

Exhibit 6 shows exposure by the major industrial sectors in EXIM's portfolio. The aircraft industry made up the largest exposure at 28.1 percent. Some of the industrial sectors included in the category "Other Industries" are transportation and warehousing, construction, information and communication service providers, mining, and agriculture, forestry, fishing and hunting.

Exhibit 6: Exposure by Major Industrial Sector



## Foreign-Currency Exposure

EXIM provides guarantees in foreign currencies to allow borrowers to better match debt-service costs with earnings. EXIM adjusts its reserves to reflect the potential risk of foreign-currency fluctuations.

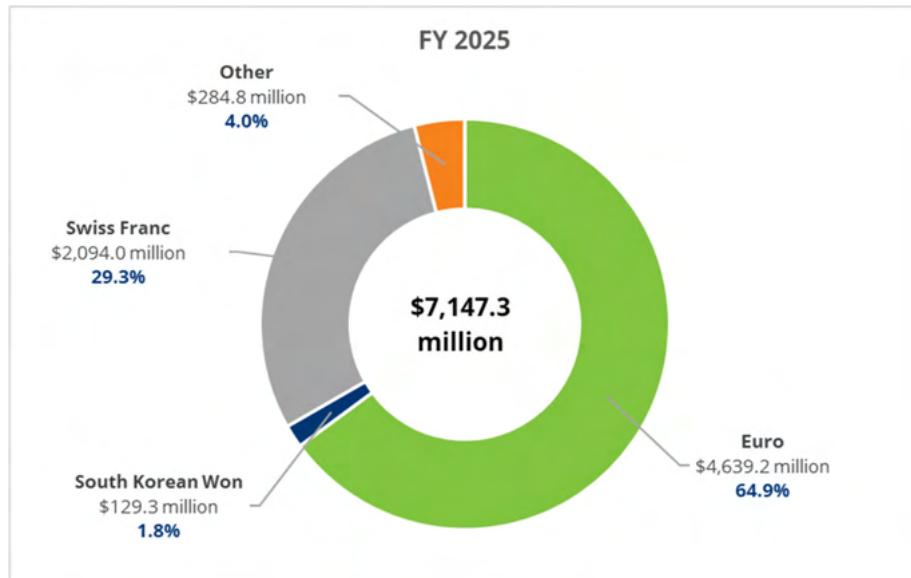
In FY 2025, EXIM approved \$2,070.2 million in transactions denominated in foreign currency, representing 23.7 percent of all new authorizations. Foreign-currency transactions are recorded on EXIM's books in U.S. dollars based on the exchange rate at the time of authorization. The U.S. dollar exposure is adjusted at year-end using the latest exchange rates.

For FY 2025 the total exposure balance of foreign-currency-denominated guarantees and insurance was \$7,147.3 million, representing 20.5 percent of total EXIM exposure.

The level of foreign-currency authorizations is attributable in large part to borrowers' desire to borrow funds in the same currency as they earn funds in order to mitigate the risk involved with exchange-rate fluctuations. The majority of EXIM's foreign-currency authorizations support U.S. transportation exports.

Exhibit 7 illustrates the U.S. dollar value of EXIM's foreign-currency exposure, for the three highest foreign currencies outstanding for FY 2025. The category labeled "Other," in FY 2025 mainly consists of the South African Rand, Canadian Dollar, Japanese Yen, and Australian Dollar.

Exhibit 7: U.S. Dollar Value of Foreign-Currency Exposure



## Portfolio-Loss Reserves

### *Allowance for Losses on Loans and Guaranteed Loan Liabilities*

The loss reserves for EXIM credits are comprised of an allowance for loss on direct loans, as well as liabilities for expected defaults on loan guarantees and insurance policies. EXIM sets aside reserves for each credit for expected future losses. Should any defaults occur, any subsequent recovery is credited to the allowance. Write-offs are charged against the allowance when management determines that a loan or claim balance is no longer collectable.

The allowance on loans and the liabilities for guarantees and insurance authorized after the implementation of FCRA, equates to the amount of expected credit loss associated with the applicable credit. EXIM has established cash-flow models for expected defaults, fees, and recoveries to estimate its credit losses. The models incorporate EXIM's actual historical loss and recovery experience.

EXIM incorporates a quantitative and qualitative framework to calculate loss reserves. The quantitative framework includes factors such as loss curves for sovereign-guaranteed transactions and for asset-backed aircraft transactions. In line with industry best practices, EXIM incorporated qualitative factors that take into account the global macroeconomic environment and set minimum loss rates.

In accordance with OMB guidelines and Statement of Federal Financial Accounting Standards (SFFAS) 2<sup>8</sup> and SFFAS 18<sup>9</sup>, EXIM annually reestimates the subsidy cost allowance for its loans and the liabilities for guarantees and insurance transactions in order to account for current financial and economic factors that may impact the portfolio's credit risk profile. This reestimate allows EXIM to annually adjust its loss reserve funds to the appropriate level necessary to cover projected future losses. If estimated credit losses decrease relative to the current level of reserve funds, EXIM sends the excess funds to the U.S. Treasury. Increases in estimated credit losses are covered by additional appropriations that are automatically available through permanent and indefinite authority, pursuant to FCRA.

The reestimate of the credit loss of the exposure for FY 1992 through FY 2025 calculated at September 30, 2025, indicated \$13.6 million of additional funds were needed in the financing accounts. The transfer of the net upward reestimate to the U.S. Treasury will take place in FY 2026. The reestimate of the credit loss of the exposure for FY 1992 through FY 2024 calculated at September 30, 2024, indicated there was a net excess of \$156.5 million of funds in the financing accounts. The transfer of the net downward reestimate to the U.S. Treasury took place in FY 2025.

The total allowance for losses for loans and claims, and liabilities for guarantees and insurance commitments as of September 30, 2025, is \$2,237.8 million, representing 11.6 percent of outstanding balance of \$19,306.3 million (Exhibit 8).

EXIM's credit programs generally have fees and interest rates higher than the expected default and funding costs, resulting in the net present value of cash inflows to be greater than the outstanding principal of the credit.

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<sup>8</sup> Accounting for Direct Loans and Loan Guarantees, August 23, 1993

<sup>9</sup> Amendments to Accounting Standards for Direct Loans and Loan Guarantees, May 17, 2000

Exhibit 8 displays the loss reserves as a percentage of the total portfolio exposure.

Exhibit 8: Loss Reserves and Exposure Summary

| (in millions)  | FY 2025            |
|--|--------------------|
| Outstanding Guarantees and Insurance                 | \$ 11,279.2        |
| Outstanding Loans                                    | 6,498.7            |
| Outstanding Defaulted Guarantees and Insurance       | 1,528.4            |
| Total Outstanding                                    | \$ 19,306.3        |
| Undisbursed Guarantees and Insurance                 | \$ 8,131.9         |
| Undisbursed Loans                                    | 7,357.6            |
| Total Undisbursed                                    | \$ 15,489.5        |
| <b>Total Exposure</b>                                | <b>\$ 34,795.8</b> |
| Weighted-Average Risk Rating of Total Exposure       | 5.9                |
| <u>Loss Reserves</u>                                 |                    |
| Liability for Guarantees and Insurance               | \$ 149.5           |
| Allowance for Loan Losses                            | 1,505.9            |
| Allowance for Defaulted Guarantees and Insurance     | 582.4              |
| <b>Total Reserves</b>                                | <b>\$ 2,237.8</b>  |
| Loss Reserve as Percentage<br>of Outstanding Balance | 11.6%              |
| Loss Reserve as Percentage<br>of Total Exposure      | 6.4%               |

## VII. KEY BUDGET AND ACCOUNTING REQUIREMENTS

EXIM reports its financial position using generally accepted accounting principles (GAAP) as applied to the federal government in the United States. GAAP for federal entities are the standards and other authoritative pronouncements as prescribed by the Federal Accounting Standards Advisory Board (FASAB). EXIM follows the format and content outlined by OMB Circular A-136<sup>10</sup> for preparing its financial statements and footnotes.

Under GAAP standards applicable to federal agencies, EXIM reported total net cost of \$65.9 million for the year ended September 30, 2025.

As previously mentioned, administrative and program costs for new authorizations are initially covered by offsetting collections from EXIM's credit-program customers. Costs above the fees collected are supplemented with an annual discretionary program appropriation from the U.S. Congress. EXIM also receives mandatory appropriations through an upward reestimate, when it is determined that additional funds are needed through the credit-loss reestimate of EXIM's existing portfolio.

While EXIM looks to further optimize the execution of mission and implementation of its Charter, EXIM complies with federal budget and governmental accounting requirements, two of which are discussed below.

### BUDGETING FOR NEW AUTHORIZATIONS UNDER THE FEDERAL CREDIT REFORM ACT

Under the FCRA, the U.S. government budgets for the present value of the estimated cost of credit programs. For EXIM, the cost is determined by analyzing the net present value of expected cash receipts and cash disbursements associated with all credits authorized during the year. Cash receipts typically include fees, loan principal, and loan interest, while cash disbursements typically include loan disbursements and the payment of claims. EXIM collects fees that cover program obligations and administrative costs to the extent possible.

When expected cash disbursements exceed expected cash receipts, there is an expected net outflow of funds, resulting in a "cost" to EXIM. This cost is sometimes referred to as subsidy or program cost. EXIM is required to estimate this cost annually and to seek budget authority from Congress to cover that cost. New loans and guarantees with a program cost cannot be committed unless sufficient program budget authority is available to cover the calculated credit cost. In FY 2025 EXIM received \$15.0 million in budget authority for credit program subsidy cost through the appropriation process.

The U.S. Treasury provides EXIM funds through an appropriation warrant to cover EXIM's program and administrative costs. The amount of the warrant is established by spending limits set by Congress. Fees collected by EXIM during the year that are in excess of expected losses (offsetting collections) are retained by EXIM. These fees are used to repay appropriation warrants received at the start of the year for administrative costs and credit program costs. In FY 2025 EXIM partially repaid \$76.9 million of the \$125.0 million administrative appropriation warrant, while the remaining \$48.1 million was covered by appropriations. The \$15.0 million budget authority EXIM received in FY 2025 for credit program subsidy costs was fully covered by appropriated funds.

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<sup>10</sup> *Financial Reporting Requirements*, revised as of July 14, 2025

## LIMITATIONS TO THE FINANCIAL STATEMENTS

The principal financial statements are prepared to report the financial position, financial condition, and results of operations of EXIM, pursuant to the requirements of 31 U.S.C. § 3515 (b). The statements are prepared from the books and records of EXIM in accordance with Federal generally accepted accounting principles (GAAP) and formats prescribed by OMB. Reports used to monitor and control budgetary resources are prepared from the same records. Users of the statements are advised that the statements are for a component of the U.S. government.

## FINANCIAL ACCOUNTING POLICY

OMB Circular A-136<sup>11</sup> details the financial data required to be disclosed, the assertions and reviews over financial information that must be performed and suggests the presentation of such information.

The accompanying FY 2025 financial statements have been prepared in accordance with generally accepted accounting principles in the United States applicable to federal agencies. EXIM follows Office of Management and Budget (OMB) Circular A-136, Financial Reporting Requirements, revised as of July 14, 2025, when preparing the financial statements and footnotes.

EXIM follows OMB Circular A-11<sup>12</sup> as the primary guidance for calculating the program cost associated with EXIM's transactions. In accordance with this guidance, the amount of program cost calculated on EXIM's transactions authorized after the implementation of FCRA and the associated fees collected equate to the loss allowance on these transactions and is disclosed as such on the financial statements and related notes.

## BALANCE SHEET AND STATEMENT OF NET COST

OMB Circular A-136 provides a basic framework for agency financial reports and allows for flexibility to provide additional information useful to the U.S. Government and the public.

EXIM's Statement of Net Costs show the costs and revenues of EXIM's major programs. There are two major components, Administrative Costs and the Reestimate of Credit Losses, which have a significant impact on the total net program cost over revenue. Fees and Interest Revenue are offset by a provision for credit loss and thus have no impact on the total net program cost over revenue. For this reason, the "Statement of Net Costs" cannot be read as the equivalent of an Income and Loss Statement.

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<sup>11</sup> *Financial Reporting Requirements*, revised as of July 14, 2025

<sup>12</sup> *Preparation, Submission, and Execution of the Budget*, revised as of August 2025

## Impact to Total Net Program Cost or Revenue

- **Program and Administrative Costs:** Program costs are subsidy expenses which is the estimated long-term cost to the government of a direct loan or guarantee, and administrative costs are the costs to operate EXIM and its programs. Program and administrative costs are covered by offsetting collections or appropriations specifically for those expenses. Program and administrative costs are reflected in the Statement of Net Costs; however, the offsetting collections and appropriation used to cover those expenses are reflected in the Statement of Changes in Net Position. Therefore, program and administrative costs have a direct impact on the total net program cost or revenue.
- **Accrual for Annual Reestimate of Credit Loss Reserves:** As previously discussed, each year an analysis is performed to determine the adequacy of the credit loss reserves reflected on the Balance Sheet. Based on this analysis, reserves are either increased or decreased, with an offsetting charge (if reserves are increased) or credit (if reserves are decreased) to the Program Costs in the Statement of Net Cost. The change in reserves can vary significantly from year to year and can have a considerable impact on total net program cost or revenue.

## No Impact to Total Net Program Cost or Revenue

- **Fee and Interest Revenue Net of Expenses:** All fee and net interest revenue is credited to the Balance Sheet loss reserves to cover future credit losses instead of being applied to cumulative results of operations. As the reserves are increased by the fee and net interest revenue, an offsetting provision for credit losses is charged against income. These components offset and have zero impact on the total net program cost or revenue.

The program and administrative costs and the accrual for the annual reestimate of credit loss reserves represent the true cost of carrying out EXIM's programs and thus are the components that drive the amount of net program cost or revenue displayed in the Statement of Net Cost. For the year ended September 30, 2025, EXIM's total net cost was \$65.9 million.

EXIM's Balance Sheet show a net position as of September 30, 2025, of \$(470.5) million. The main variable impacting EXIM's Net Position is the Cumulative Results of Operations, which represent distribution of funds to the U.S. Treasury rather than the results of operational activities. The FCRA requires federal agencies to transfer excess funds to the U.S. Treasury.

Over time, EXIM neither accumulates earnings nor has a long-term negative net position, although from time to time the net position shown on the Balance Sheet may be either positive or negative. The yearly change in the net position is shown in detail in the Statement of Changes in Net Position. Net costs or revenue from the Statement of Net Costs, offsetting collections and appropriation usage, and transfers to the U.S. Treasury all affect the net position shown on EXIM's Balance Sheet.

Occasionally EXIM's Statement of Net Cost may show a net cost for the year, while at the same time, EXIM will have transferred funds to the U.S. Treasury in the same year. This is due to differing requirements of the two main pieces of legislation that govern EXIM's operations: the FCRA and the annual appropriations act passed by Congress.

The annual appropriations acts<sup>13</sup> permit EXIM to use offsetting collections (fees and interest collected in the current year that are in excess of amounts set aside for expected losses for the credits that are disbursing in the current fiscal year) to cover administrative obligations made in the current year. Offsetting collections in a given year in excess of amounts stated in the annual appropriation must be transferred to the U.S. Treasury at the end of each fiscal year.

The FCRA requires an annual reestimate of the reserves for credit losses for the entire portfolio. As mentioned above in the "Portfolio-Loss Reserves" section, if the analysis indicates that the reserves must be increased, there is a charge against income for the amount of the increase and together with the program costs may result in a significant overall net cost. The Statement of Net Costs may therefore show a net overall cost, while in the same year excess offsetting collections are transferred to the U.S. Treasury.

In addition to excess offsetting collections, EXIM's transfers to the U.S. Treasury have included dividends declared and paid, pre-FCRA liquidating account transfers, and downward reestimates of the reserve for credit losses.

### Significant Factors Influencing Financial Results

The most significant factor that determines EXIM's financial results and condition is a change in the risk level of EXIM's loan, guarantee, and insurance portfolio, and the adjustment to the allowance for credit losses that must be made to reflect the change in risk. The level of risk of individual credits or groups of credits may change in an unexpected manner as a result of international financial, economic, and/or political events. Consequently, significant, and unanticipated changes in EXIM's allowance for credit losses may occur in any year. EXIM regularly conducts stress testing on its overall portfolio and regions using Monte-Carlo simulation.

The major risks to EXIM in its credit portfolio are repayment risk and market risk.

**Repayment Risk:** In fulfilling its mission to support U.S. jobs by facilitating the export of U.S. goods and services by providing competitive export financing and ensuring a level playing field for U.S. goods and services in the global marketplace, EXIM must balance the risks associated with assuming credit and country risks that the private sector is unable or unwilling to accept with the requirement of reasonable assurance of repayment for its credit authorizations. Repayment risk is the risk that a borrower will not pay according to its agreement and EXIM may eventually have to write-off some or the entire obligation. Repayment risk is primarily composed of:

- **Credit Risk:** The risk that an obligor may not have sufficient funds to service its debt or may not be willing to service its debt even if sufficient funds are available.
- **Country Risk:** The risk that payment may not be made to EXIM, its guaranteed lender, or its insured as a result of expropriation of the obligor's property, war, or inconvertibility of the borrower's currency into U.S. dollars.

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<sup>13</sup> E.g., Full-Year Continuing Appropriations and Extensions Act, 2025 (P.L. 119-4, Div. A, 139 STAT 12)

**Market Risk:** Risks stemming from the nature of the markets in which EXIM operates. Principal components of market risk are:

- **Concentration Risk:** Risks stemming from the composition of the credit portfolio as opposed to risks related to specific obligors. EXIM has the following concentration risks:
  - **Industry Risk:** The risk that events could negatively impact not only one company but many companies simultaneously in the same industry. EXIM's credit exposure is highly concentrated by industry: 69.5 percent of EXIM's credit portfolio is in three industries (air transportation, oil and gas, and manufacturing), with air transportation representing 28.1 percent of EXIM's total exposure. Events impacting these industries are frequently international in nature and may not be confined to a specific country or geographic area. Due to the effects of the COVID-19 pandemic on the airline industry and the global nature of the pandemic, concentration risk from EXIM's exposure in this industry had a significant impact on the EXIM portfolio.
  - **Geographic/Risk-Similar Region Concentration:** The risk that events could negatively impact not only one country but many countries simultaneously in an entire region. Currently, 59.8 percent of EXIM's credit exposure is concentrated in three separate regions: sub-Saharan Africa 28.4 percent, MENA 15.8 percent, and Europe 15.6 percent.
  - **Obligor Concentration:** The risk stemming from portfolio concentration with one or a few obligors such that a default by one or more of those borrowers will have a disproportionate impact. EXIM's five largest public and private-sector obligors make up 41.2 percent of the portfolio. EXIM proactively manages individual transactions in EXIM's portfolio with a focus on the financial condition of an obligor. In addition, EXIM assesses the use, maintenance, and condition of mortgaged collateral, as applicable along with actively managing operative phase matters, including any requested or necessary amendments, waivers, and consents.
- **Foreign-Currency Risk:** The risk stemming from an appreciation or depreciation in the value of a foreign currency in relation to the U.S. dollar for EXIM transactions denominated in that foreign currency. If and when EXIM pays claims under foreign-currency guarantees, the notes are converted from a foreign-currency obligation to a U.S. dollar obligation. The obligor must then repay EXIM the balance in U.S. dollars. This converts the foreign-currency loan to a dollar loan at that point, thereby eliminating any further foreign-exchange risks. EXIM provides support for guarantees and insurance denominated in certain foreign currencies. At the time of authorization, EXIM records the authorization amount as the U.S. dollar equivalent of the foreign-currency obligation based on the exchange rate at that time.
- **Interest-Rate Risk:** EXIM makes fixed-rate loan commitments prior to borrowing to fund loans and takes the risk that it will have to borrow the funds at an interest rate greater than the rate charged on the credit. To mitigate the interest-rate risk, EXIM charges at least 100 basis points over borrowing costs and generally fixes the interest rates at the time of disbursement.

**Operational Risk:** Operational risk is the risk of material losses resulting from human error, system deficiencies, and control weaknesses. To mitigate the risk of loss stemming from operational dysfunctions, EXIM has established a control environment that includes process documentation, proper supervisory monitoring, and technology access/edit controls. In addition, EXIM provides staff with training to reduce operational risk across the organization, along with the Chief Ethics Officer who oversees the enforcement of the Code of Official Conduct for all employees and contractors of EXIM. EXIM also has an Office of Inspector General that conducts audits, evaluations, and investigations relating to EXIM's program and support operations.

#### Stress Tests

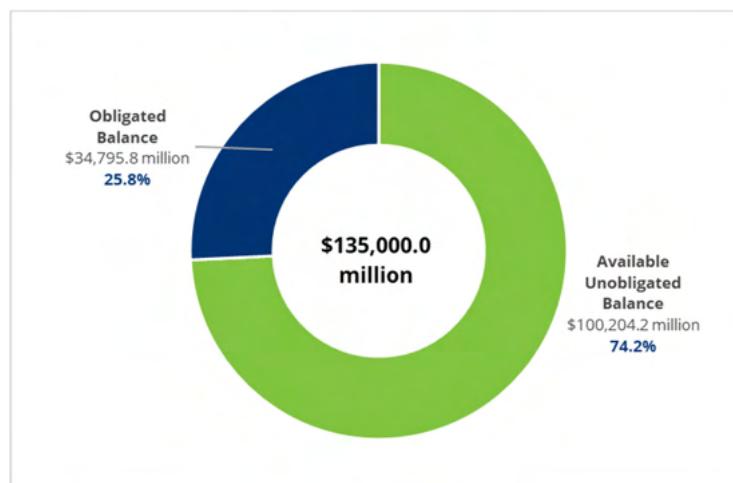
In September 2025, EXIM conducted a stress test on the portfolio using simulated scenarios. Results indicated that, under an adverse scenario characterized by broad-based credit deterioration, EXIM's default rate could exceed 2.0 percent. Under the base case scenario, however, the default rate is expected to remain below 2.0 percent over the life of the current portfolio.

If EXIM's default rate exceeds 2.0 percent, EXIM's total exposure generally may not exceed the amount of loans, guarantees, and insurance outstanding as of the last day of the quarter in which the default rate was calculated to exceed 2.0 percent, effectively constraining new authorizations until exposure is reduced or the default rate falls back below the statutory threshold.

### VIII. OTHER MANAGEMENT INFORMATION

EXIM is subject to a statutory limit on lending which acts as an absolute financial limitation on the outstanding aggregate amount of all EXIM's loans, guarantees, and insurance. Under provisions of the Export-Import Bank Act, as amended in FY 2020, EXIM's current statutory limit on lending is \$135,000.0 million. As of September 30, 2025, EXIM's statutory authority was obligated as follows, with EXIM utilizing 25.8 percent or \$34,795.8 million of its statutory limit on lending, leaving \$100,204.2 million or 74.2 percent available to be used.

Exhibit 10: Statutory Limit on Lending (in millions)



## IX. SYSTEMS, CONTROLS, LEGAL COMPLIANCE

An effective internal controls program helps EXIM safeguard government resources and ensure that EXIM efficiently and effectively fulfills its core mission and achieves strategic goals. In FY 2025, EXIM continued its efforts to increase and reinforce an internal controls program and internal control compliance by executing best practices aligned with relevant laws and regulations.

### Documentation and Evaluation of Internal Controls

As part of an organization's internal controls program key business level and entity-wide controls are evaluated, on an annual basis, to assess the adequacy of the control design and the extent to which they are operating effectively in accordance with standards. Reports regarding results of the evaluation are provided to stakeholders within the organization, and corrective actions are recommended and remediated by management, as appropriate.

As part of EXIM's continued efforts in the implementation and improvement of the internal controls program, the following provides general information regarding EXIM's progress, documentation, and evaluation of internal controls and areas of focus:

*Standards for Internal Control in the Federal Government (Green Book):* These standards, published by the GAO, provide criteria to be used by federal agencies for designing, implementing, and operating an effective internal control system. In FY 2025, EXIM continued to work towards its comprehensive evaluation of internal controls, as outlined in the Green Book.

*Business Level Controls:* Business level controls are controls that are built directly into operational processes to support an organization in achieving its objectives and addressing related risks. EXIM has begun documenting and designating certain business level controls as "key" regarding the agency's operations, reporting and compliance requirements and used a risk-based approach to test certain key controls for design and operating effectiveness around financial reporting and internal accounting controls.

*Entity-Wide Controls:* Entity-wide controls are controls that have a pervasive effect on an entity's internal control system. These controls are overarching and support the overall effectiveness of EXIM's internal control environment. EXIM facilitated preliminary self-assessments across its offices within the following five categories: control environment, risk assessment, control activities, information and communication and monitoring, which address the five components and underlying control principles of internal controls. EXIM will continue to work on documenting and assessing its entity-wide internal controls.

*Fraud Prevention:* In FY 2025, EXIM continued efforts to fully implement GAO's Framework for Managing Fraud Risks in Federal Programs. This work is focused on identifying and responding to fraud risks and developing control activities to prevent and detect fraud. As part of the framework, potential fraud areas are identified, and key controls are evaluated and implemented as proactive measures to prevent fraud. Please refer to Payment Integrity Information Act reporting, as described in the "Other Information" section of this report.

*Information Technology Controls:* To protect the confidentiality, integrity, and availability of the EXIM information systems and the information processed and stored by those systems, EXIM implements the controls included in the National Institute of Standards and Technology's Special Publication No. 800-53, Security and Privacy Controls for Federal Information Systems and Organizations.

### **Audit Coordination and Follow-Up Program**

In implementing OMB Circular A-50, *Audit Follow-Up*, EXIM has established its audit coordination and follow-up activities. EXIM's policy is to fully cooperate with the OIG and GAO on audits of EXIM operations and programs, and ensure the efficient tracking, resolution, and implementation of agreed-upon audit recommendations contained in audit reports issued by the OIG and GAO. EXIM has dedicated staff to coordinate with OIG and GAO audit representatives in providing access to records and information needed to complete audits and ensure that management responses to draft reports are provided in a timely manner. To facilitate timely completion and closure of audit recommendations, staff regularly monitors corrective action plans, including periodic reporting of open recommendations to the head of agency.

### **Enterprise Risk Management Activities**

As a part of EXIM's Enterprise Risk Management (ERM) activities, EXIM conducted an agency-wide risk assessment, which was used to prepare EXIM's FY 2025 risk profile. This process consisted of meeting with risk owners to discuss mitigation strategies for EXIM's top risks and related measures to assess strategy effectiveness. Agency-wide communication regarding ERM and the recurring meetings for emerging risks continued to foster a risk management awareness culture.

### **Financial Systems**

EXIM's financial management system is a collection of automated commercial-off-the-shelf federal financial accounting software, and custom developed applications crafted around the unique requirements of EXIM's mission. In addition to the core transaction processing capabilities, state-of-the-market data and reporting capabilities and financial subsystems are part of the financial reporting and control process FY 2025 saw continued improvements in financial systems security and continued modernization of financial processing workstreams. As mentioned in our FY 2024 report, a long-term modernization strategy around various elements of the financial systems portfolio is being executed. Current year activity included enhancements that continued to streamline financial processes and reduce manual efforts. On the infrastructure and cyber security side EXIM completed further moves of financial systems infrastructure to secure and resilient cloud providers as well as carrying out exercises involving the recovery of capabilities from critical infrastructure failures.

## DATA Act

The purpose of the DATA Act<sup>14</sup> is to make federal spending data more accessible, searchable, and reliable. The U.S. Department of the Treasury (Treasury) and OMB are leading the government-wide implementation of the DATA Act.

The DATA Act directs OMB and Treasury to establish government-wide financial data standards for federal funds made available to or expended by federal agencies and entities receiving such funds. EXIM provides its spending information — including financial and award data — using a new, government-wide data structure, and EXIM continues to report DATA Act information to the U.S. Treasury on a monthly basis.

EXIM is a wholly owned government corporation, and, as such, is not required to comply with all aspects of OMB Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*. As such, EXIM does not issue an annual assurance statement. According to the Government Corporation Control Act of 1945, EXIM is required to issue a Management Report on Financial Statement and Internal Accounting Controls. Therefore, EXIM has elected to present its DATA Act assurance statement in this section of the annual management report.

### Assurance on DATA Act

To ensure that EXIM's DATA Act reporting is complete, accurate, timely, and fit for purpose, EXIM continues to leverage new and existing internal controls over financial reporting for improvements in the overall quality of its financial and award data. In the past year EXIM has made significant progress in strengthening its DATA Act reporting. During FY 2025 the agency made key improvements to its systems, processes, and controls.

Highlights include:

- Deployment of a new interim contract lifecycle data management tool to improve data accuracy, reporting, and streamline procurement workflows.
- Introduction of enhanced reconciliation between financial and procurement systems to better detect and resolve data discrepancies.
- Completion of data inventories for all required files and establishment of a formal review process aligned with the Governmentwide Spending Data Model (GSDM) updates.
- Automated the internal review and distribution of Data Act files to streamline operations, improve efficiency, and ensure timely submissions.
- Redevelopment and implementation of a comprehensive Data Quality Plan (DQP) which addresses internal controls, risk management, and continuous improvement in data reporting.
- Expanded training and improved alignment of financial assistance data with SAM and Data Act requirements.

These enhancements reflect EXIM's commitment to improving data integrity, compliance, and transparency in its financial and award reporting.

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<sup>14</sup> Digital Accountability and Transparency Act of 2014 (DATA Act) (P.L. 113-101)



## Management Report on Financial Statement and Internal Accounting Controls

January 16, 2026

Export-Import Bank (EXIM) management is responsible for establishing and maintaining effective internal controls over the content and integrity of the financial management system, the financial data included in EXIM's annual management report and for ascertaining that this data fairly presents EXIM's financial position and results of operations.

EXIM maintains a system of internal accounting controls, policies, and procedures designed to provide reasonable assurance, at reasonable cost, that obligations and costs are in compliance with applicable law, funds, property, and other assets are safeguarded against waste, loss, unauthorized use, or misappropriation and that transactions are processed and properly recorded and accounted for in accordance with management's authorization, and that the financial statements are accurately prepared in accordance with applicable laws and regulations. EXIM believes that its system of internal accounting controls over financial reporting appropriately balances the cost-benefit relationship.

EXIM conducted an assessment of the design, implementation, and effectiveness of its internal controls over its financial reporting. Based on the results of the assessment, EXIM can provide reasonable assurance that its internal controls over financial reporting were properly designed and implemented and operated effectively in the fiscal year ended September 30, 2025.

As a government corporation, required to submit an Annual Management Report, under Chapter 91 of title 31, United States Code, EXIM has selected the standards promulgated by Federal Accounting Standards Advisory Board (FASAB) for the preparation and fair presentation of EXIM's financial statements in accordance with generally accepted accounting principles applicable to federal agencies (U.S. GAAP). As explained in more detail in the notes to the financial statements, the financial statements recognize the impact of credit-reform legislation on the Bank's commitments. Other financial information related to the Bank included elsewhere in the report is presented on a basis consistent with the financial statements.

EXIM's operations fall under the provisions of the Federal Credit Reform Act of 1990. This law provides that credit subsidy calculations must be performed on a present-value basis for all new loan, guarantee, and insurance commitments, and the resulting cost, if any, must be covered by budget authority provided by Congress. Credits may not be approved if sufficient budget authority is not available.

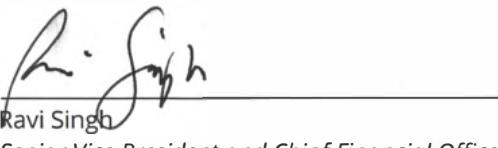
As required by the Federal Information Security Management Act (FISMA), the Bank develops, documents, and implements an agency-wide program to provide information privacy and security (management, operational, and technical security controls) for the information and information systems that support EXIM's operations and assets, including those provided or managed by another agency, contractor, or other source.

EXIM's financial statements were audited by independent accountants and their opinion on the fair presentation of the financial statements can be found in this report after notes to the financial statements.

**Export-Import Bank of the United States**

  
John Jovanovic  
President and Chairman of EXIM Board of Directors

**Export-Import Bank of the United States**

  
Ravi Singh  
Senior Vice President and Chief Financial Officer

# Financial Statements

## BALANCE SHEET

| (in millions)   | As of<br>September 30, 2025 |                |  |  |
|---|-----------------------------|----------------|--|--|
| <b>ASSETS</b>   |                             |                |  |  |
| <b>Intragovernmental</b>                                  |                             |                |  |  |
| Fund Balance with Treasury (Note 2)                       | \$                          | 3,215.9        |  |  |
| <b>Total Assets - Intragovernmental</b>                   |                             | <b>3,215.9</b> |  |  |
| <b>Public</b>   |                             |                |  |  |
| Loans Receivable, Net                                     |                             |                |  |  |
| <i>Direct Loans Receivable, Net (Note 3A)</i>             | 5,204.0                     |                |  |  |
| <i>Receivables from Subrogated Claims, Net (Note 3E)</i>  | 1,002.4                     |                |  |  |
| <b>Total Loans Receivable, Net</b>                        |                             | <b>6,206.4</b> |  |  |
| Accounts Receivable                                       | 14.8                        |                |  |  |
| <b>Total Assets - Public</b>                              |                             | <b>6,221.2</b> |  |  |
| <b>Total Assets</b>                                       | <b>\$</b>                   | <b>9,437.1</b> |  |  |
| <b>LIABILITIES</b>  |                             |                |  |  |
| <b>Intragovernmental</b>                                  |                             |                |  |  |
| Debt (Note 7)   | \$                          | 9,235.8        |  |  |
| Other Liabilities   |                             |                |  |  |
| <i>Accounts Payable to the U.S. Treasury (Note 6)</i>     | 291.0                       |                |  |  |
| <i>Benefit Program Contributions Payable (Note 8)</i>     | 0.5                         |                |  |  |
| <i>Other Liabilities (Note 8)</i>                         | 0.1                         |                |  |  |
| <b>Total Other Liabilities</b>                            |                             | <b>291.6</b>   |  |  |
| <b>Total Liabilities - Intragovernmental</b>              |                             | <b>9,527.4</b> |  |  |
| <b>Public</b>   |                             |                |  |  |
| Federal Debt and Interest Payable (Note 7)                | 115.9                       |                |  |  |
| Accounts Payable  | 7.2                         |                |  |  |
| Loan Guarantee Liabilities (Note 3G)                      | 149.5                       |                |  |  |
| Federal Employee Salary, Leave, and Benefits Payable      | 7.3                         |                |  |  |
| Other Liabilities   |                             |                |  |  |
| <i>Advances from Others and Deferred Revenue (Note 8)</i> | 83.3                        |                |  |  |
| <i>Other Liabilities (Note 8)</i>                         | 17.0                        |                |  |  |
| <b>Total Other Liabilities</b>                            |                             | <b>100.3</b>   |  |  |
| <b>Total Liabilities - Public</b>                         |                             | <b>380.2</b>   |  |  |
| <b>Total Liabilities</b>                                  | <b>\$</b>                   | <b>9,907.6</b> |  |  |
| <b>NET POSITION</b>                                       |                             |                |  |  |
| Unexpended Appropriations                                 | \$                          | 130.4          |  |  |
| Cumulative Results of Operations                          |                             | (600.9)        |  |  |
| <b>Total Net Position</b>                                 |                             | <b>(470.5)</b> |  |  |
| <b>Total Liabilities and Net Position</b>                 | <b>\$</b>                   | <b>9,437.1</b> |  |  |

The accompanying notes are an integral part of the financial statements.

## STATEMENT OF NET COSTS

| (in millions)                                 | For the Year Ended<br>September 30, 2025 |
|---|--|
| <b>Loans</b>                                  |  |
| Program Costs                                 | 572.3                                    |
| Less: Earned Revenue                          | (529.3)                                  |
| <b>Net Cost of Loans</b>                      | <b>43.0</b>                              |
| <b>Guarantees</b>                             |  |
| Program Costs                                 | 4.7                                      |
| Less: Earned Revenue                          | (132.9)                                  |
| <b>Net Cost of Guarantees</b>                 | <b>(128.2)</b>                           |
| <b>Insurance</b>                              |  |
| Program Costs                                 | 4.9                                      |
| Less: Earned Revenue                          | (10.3)                                   |
| <b>Net Cost of Insurance</b>                  | <b>(5.4)</b>                             |
| <b>Net Excess Program (Revenue) over Cost</b> | <b>(90.6)</b>                            |
| <b>Administrative Costs (Note 3K)</b>         |  |
| Administrative Costs                          | 157.0                                    |
| Less: Administrative Expenses Reimbursed      | (0.5)                                    |
| <b>Net Administrative Costs</b>               | <b>156.5</b>                             |
| <b>Net Cost from Operations</b>               | <b>65.9</b>                              |

The accompanying notes are an integral part of the financial statements.

## STATEMENT OF CHANGES IN NET POSITION

| <u>For the Year Ended September 30, 2025</u> |                              |                                     |                   |       |  |
|--|------------------------------|-------------------------------------|-------------------|-------|--|
| (in millions)                                | Unexpended<br>Appropriations | Cumulative Results<br>of Operations |                   | Total |  |
| <b>Beginning Balance</b>                     | \$ 116.7                     | \$ (470.0)                          | \$ (353.3)        |       |  |
| Appropriations Received - Admin              | 48.1                         | -                                   | 48.1              |       |  |
| Appropriations Received - IG                 | 8.9                          | -                                   | 8.9               |       |  |
| Appropriations Received - Reestimate         | 85.5                         | -                                   | 85.5              |       |  |
| Appropriations Received - Subsidy            | 15.0                         | -                                   | 15.0              |       |  |
| Appropriations Used                          | (135.3)                      | 135.3                               | -                 |       |  |
| Offsetting Collections                       | -                            | 99.3                                | 99.3              |       |  |
| Transfer Without Reimbursement               | -                            | (61.3)                              | (61.3)            |       |  |
| Other Adjustments                            | (8.5)                        | 3.9                                 | (4.6)             |       |  |
| Imputed Financing                            | -                            | 8.0                                 | 8.0               |       |  |
| Other:                                       |                              |                                     |                   |       |  |
| Non-Entity Activity (Note 6)                 | -                            | (250.2)                             | (250.2)           |       |  |
| <b>Total Financing Sources</b>               | <b>13.7</b>                  | <b>(65.0)</b>                       | <b>(51.3)</b>     |       |  |
| <b>Net Cost from Operations</b>              | <b>-</b>                     | <b>65.9</b>                         | <b>65.9</b>       |       |  |
| <b>Net Change</b>                            | <b>13.7</b>                  | <b>(130.9)</b>                      | <b>(117.2)</b>    |       |  |
| <b>Ending Balance</b>                        | <b>\$ 130.4</b>              | <b>\$ (600.9)</b>                   | <b>\$ (470.5)</b> |       |  |

The accompanying notes are an integral part of the financial statements.

## COMBINED STATEMENT OF BUDGETARY RESOURCES

| (in millions)  | For the Year Ended September 30, 2025 |                                |                     |       |
|--|---------------------------------------|--------------------------------|---------------------|-------|
|  | Program<br>Account                    | Non-Budgetary<br>Credit Reform |                     | Total |
|  | Financing Account                     |                                |                     |       |
| <b>Budgetary Resources</b>   |                                       |                                |                     |       |
| Unobligated from Prior-Year Budget Authority, Net<br>(Discretionary and Mandatory) | \$ 133.5                              | \$ 30.2                        | \$ 163.7            |       |
| Appropriations (Discretionary and Mandatory)                                       | 157.5                                 | -                              | 157.5               |       |
| Borrowing Authority (Discretionary and Mandatory)                                  | -                                     | 2,003.1                        | 2,003.1             |       |
| Spending Authority from Offsetting Collections<br>(Discretionary and Mandatory)    | 102.6                                 | 1,278.6                        | 1,381.2             |       |
| <b>Total Budgetary Resources (Note 11)</b>   | <b>\$ 393.6</b>                       | <b>\$ 3,311.9</b>              | <b>\$ 3,705.5</b>   |       |
| <b>Status of Budgetary Resources</b>   |                                       |                                |                     |       |
| New Obligations and Upward Adjustments (Total)                                     | \$ 261.2                              | \$ 2,181.6                     | \$ 2,442.8          |       |
| Unobligated Balance, End of Year:  |                                       |                                |                     |       |
| Apportioned, Unexpired, End of Year  | 91.6                                  | 1,130.3                        | 1,221.9             |       |
| Expired Unobligated Balance, End of Year   | 40.8                                  | -                              | 40.8                |       |
| Unobligated Balance, End of Year (Total) (Note 11)                                 | 132.4                                 | 1,130.3                        | 1,262.7             |       |
| <b>Total Status of Budgetary Resources</b>   | <b>\$ 393.6</b>                       | <b>\$ 3,311.9</b>              | <b>\$ 3,705.5</b>   |       |
| <b>Outlays, Net</b>  |                                       |                                |                     |       |
| Outlays, Net (Total) (Discretionary and Mandatory)                                 | \$ 129.1                              | \$ 129.1                       | \$ 129.1            |       |
| Distributed Offsetting Receipts (-)  | (242.0)                               | (242.0)                        | (242.0)             |       |
| <b>Agency Outlays, Net (Discretionary And Mandatory)</b>                           | <b>\$ (112.9)</b>                     | <b>\$ (112.9)</b>              | <b>\$ (112.9)</b>   |       |
| <b>Disbursement, Net (Total) (Mandatory)</b>                                       | <b>\$ (1,030.1)</b>                   | <b>\$ (1,030.1)</b>            | <b>\$ (1,030.1)</b> |       |

The accompanying notes are an integral part of the financial statements.

# Notes to the Financial Statements

## 1. SUMMARY OF SIGNIFICANT ACCOUNTING AND REPORTING POLICIES

### Enabling Legislation and Mission

The Export-Import Bank of the United States (EXIM) is an independent agency and a wholly owned U.S. government corporation that was first organized as a District of Columbia banking corporation in 1934. Over its history, EXIM has provided a variety of financing tools to empower American exporters and helped bring multiple historic international projects, including the Marshall Plan, the Burma Road, the Pan American Highway, and the Panama Canal, into reality.

EXIM is the official export credit agency of the United States. In accordance with its Charter (12 USC 635 et seq.), continuation of EXIM's functions in furtherance of its objectives and purposes is subject to periodic extensions granted by Congress. In December 2019, The Export-Import Bank Extension (P.L.116-94, Div. I, Title IV) fully reauthorized EXIM through December 31, 2026.

The mission of EXIM is to support U.S. exports by providing export financing through its direct loan, loan guarantee, and export credit insurance programs in cases where the private sector is unable or unwilling to provide financing or where such support is necessary to level the playing field due to financing provided by foreign governments to their exporters that are in competition for export sales with U.S. exporters. EXIM's Charter requires reasonable assurance of repayment for the transactions EXIM authorizes, and EXIM closely manages credit and other risks in its portfolio. In pursuit of its mission of supporting U.S. exports, EXIM offers four main financial products: loan guarantees, working capital guarantees, direct loans, and export credit insurance. All EXIM obligations carry the full faith and credit of the U.S. government.

### EXIM Programs

Loans and guarantees extended under the medium-term credit program typically have repayment terms of one to seven years, while loans and guarantees extended under the long-term credit program usually have repayment terms in excess of seven years. For medium- and long-term transactions, EXIM requires the buyer to pay 15 percent of the value of the export contract. EXIM finances the lesser of 85 percent of eligible goods/services or 100 percent of the U.S content. Under the Working Capital Guarantee Program, EXIM provides repayment guarantees to lenders on secured, short-term working capital loans made to qualified exporters. The working capital guarantee may be approved for a single loan or a revolving line of credit. EXIM's working capital guarantee protects the lender from default by the exporter for 90 percent of the loan principal and interest.

EXIM's export credit insurance policies help U.S. exporters sell their goods overseas by protecting them against the risk of foreign-buyer or other foreign-debtor default for political or commercial reasons, allowing them to extend credit to their international customers. Insurance policies may apply to shipments to one buyer or many buyers, insure comprehensive (commercial and political) credit risks or only political risks, and cover short-term or medium-term export sales.

## Basis of Accounting

EXIM reports under generally accepted accounting principles (GAAP) in the United States. GAAP for federal entities are the standards and other authoritative pronouncements prescribed by the Federal Accounting Standards Advisory Board (FASAB). EXIM follows Office of Management and Budget (OMB) Circular A-136, *Financial Reporting Requirements*, revised as of July 14, 2025, when preparing the financial statements and footnotes.

EXIM's Balance Sheet, Statement of Net Cost, and Statement of Changes in Net Position are prepared using the accrual basis of accounting. This basis requires recognition of the financial effects of transactions, events, and circumstances in the periods when those transactions, events, and circumstances occur, regardless of when cash is received or paid. EXIM also uses budgetary accounting to facilitate compliance with legal constraints and to track its budget authority at the various stages of execution. The Statement of Budgetary Resources are presented on a combined basis and are prepared using budgetary accounting methods.

EXIM is a component of the U.S government. For this reason, some of the assets and liabilities reported by EXIM may be eliminated for government-wide reporting because they are offset by assets and liabilities of another U.S. government entity. These financial statements should be read with the realization that they are for a component of the U.S. government, a sovereign entity.

EXIM as a reporting entity has no additional organizations that are consolidated in its financial statements; however, it does have a related-party relationship with the Private Export Funding Corporation (PEFCO). EXIM's financial statements reflect the results of agreements with PEFCO, which is owned by a consortium of private-sector banks, industrial companies, and financial-services institutions. Please refer to Footnote 14. Related-Party Transactions for more information.

## Budgetary Terms

The purpose of Federal budgetary accounting is to control, monitor, and report on funds made available to Federal agencies by law and help ensure compliance with the law. The following budget terms, as defined by OMB Circular A-11 *Preparation, Submission, and Execution of the Budget*, are commonly used:

**Appropriation:** a provision of law (not necessarily in an appropriations act) authorizing the expenditure of funds for a given purpose. Usually, but not always, an appropriation provides budget authority.

**Budgetary Resources:** amounts available to incur obligations in a given year. Budgetary resources consist of new budget authority and unobligated balances of budget authority provided in previous years.

**Obligation:** a binding agreement that will result in outlays, immediately or in the future. Budgetary resources must be available before obligations can be incurred legally.

**Offsetting Collections:** payments to the Government that, by law, are credited directly to expenditure accounts and deducted from gross budget authority and outlays of the expenditure account, rather than added to receipts. Usually, offsetting collections are authorized to be spent for the purpose of the account without further action by Congress. They usually result from business-like transactions with the public, including payments from the public in exchange for goods and services, reimbursements for damages, and gifts or donations of money to the Government and from intragovernmental transactions with other Government accounts. The authority to spend offsetting collections is a form of budget authority.

**Outlay:** a payment to liquidate an obligation (other than the repayment of debt principal or other disbursements that are “means of financing” transactions). Outlays generally are equal to cash disbursements but are also recorded for cash-equivalent transactions, such as issuance of debentures to pay insurance claims, and in a few cases are recorded on an accrual bases such as interest on public issues of public debt. Outlays are a measure of Government spending.

For further information about budget terms and concepts, see the “Budget Concepts” chapter of the *Analytical Perspective* volume of the President’s Budget<sup>15</sup>.

### Use of Estimates

The preparation of financial statements requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, and net position and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and costs during the reporting period. The most significant of these estimates are the allowances for losses on loans receivable, subrogated claims receivable, and guarantees, and insurance. EXIM uses its historical default and recovery experience to calculate loss estimates. Actual results may differ from those estimates.

### Fund Balance with Treasury (FBWT)

Cash balances are held by U.S. Treasury on behalf of EXIM to make expenditures, pay liabilities, and disburse funds for loan obligations. Fund balances at the U.S. Treasury include expired year amounts, which are unavailable for new obligation, as well as amounts currently available for new obligations.

FBWT is an asset of EXIM and a liability of the U.S. Treasury General Fund. The amounts represent commitments by the government to provide resources for particular programs, but they do not represent net assets to the government as a whole. When EXIM seeks to use FBWT to liquidate budgetary obligations, the U.S. Treasury will finance the disbursements in the same way it finances all other disbursements, which is to borrow from the public if there is a budget deficit (and to use current receipts if there is a budget surplus).

### Direct Loans Receivable, Net

Loan obligations are carried at principal, interest, and fees receivable amounts less an allowance for credit losses. From time to time, EXIM restructures financial terms because the obligor or country has encountered financial difficulty, and EXIM has determined that providing relief in this manner will enhance the ability to collect the loan.

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<sup>15</sup> <https://www.whitehouse.gov/omb/budget/analytical-perspectives/>

## **Receivables from Subrogated Claims, Net**

Receivables from subrogated claims represent the outstanding balance of payments that were made on claims that were submitted to EXIM in its capacity as guarantor or insurer under EXIM's loan guarantee or export credit insurance programs. Receivables from subrogated claims are carried at principal and interest receivable amounts less an allowance for claim losses, and foreclosed properties, if any. Under the subrogation clauses in its guarantee and insurance contracts, EXIM receives all rights, title, and interest in all amounts relating to claims paid under insurance policies and guarantees and therefore establishes an asset to reflect such rights.

## **Accrued Interest**

Interest is accrued on direct loans and rescheduled claims as it is earned. Generally, loans and rescheduled claims receivable delinquent 90 days or more, and with a certain risk rating, are placed on a nonaccrual status unless they are well-secured and significant collections have been received. At the time that a loan or rescheduled claim is placed on nonaccrual status, any accrued but unpaid interest previously recorded is reversed against current-period interest income. The interest on these credits is accounted for on a cash basis until qualifying for return to accrual status. Generally, these credits are returned to accrual status when all principal and interest amounts contractually due are brought current and future payments are reasonably assured.

## **Accounting for Capitalized Interest on Rescheduled Loans and Subrogated Claims**

Rescheduling agreements frequently allow for EXIM to add uncollected interest to the principal balance of rescheduled loans and subrogated claims receivable (i.e., capitalized interest). When capitalized, any accrued interest receivable is reversed against the current period's interest income. The amount of interest that was capitalized and included in the principal balance is recorded as income when cash collections occur and only after all principal not related to the capitalized interest is paid. An allowance is established for all uncollected capitalized interest.

## **Allowance for Losses on Loans, and Guaranteed Loan Liabilities**

The allowance for losses on loans and liabilities for guaranteed loans provides for estimated losses inherent in the loan, claim, guarantee, and insurance portfolios. The allowance and liabilities are established through a provision charged to earnings. Write-offs are charged against the allowance when management believes a loan or claim balance is uncollectible. Subsequent recoveries, if any, are credited to the allowance.

The allowance and liabilities are evaluated on a regular basis by management and is based upon management's periodic review of the collectability of the credits considering historical and market experience, the nature and volume of the credit portfolio, adverse situations that may affect the borrower's ability to repay, estimated value of any underlying collateral, and prevailing worldwide economic and political conditions. This evaluation is inherently subjective as it requires estimates that are susceptible to significant revision as more information becomes available.

The allowance and liabilities for EXIM's credit-reform credits represent the amount of estimated credit loss associated with the applicable credit. The credit loss is defined as the net present value of estimated loan, guarantee, and insurance defaults less subsequent estimated recoveries. EXIM has established cash-flow models for expected defaults, fees, and recoveries to estimate the credit loss for each approved credit. EXIM uses recent historical loss experience and other factors in developing the expected loss factors.

The net credit loss of credit-reform loans, guarantees, and insurance is reestimated annually in accordance with OMB guidelines and Statement of Federal Financial Accounting Standards (SFFAS) 2, *Accounting for Direct Loans and Loan Guarantees*, SFFAS 18, *Amendments to Accounting Standards for Direct Loans and Loan Guarantees*, and SFFAS 19, *Technical Amendments to Accounting Standards for Direct Loans and Loan Guarantees in SFFAS 2*. The reestimates adjust the allowance for credit losses to account for actual activity and changes in the financial and economic factors that affect the repayment prospects over time.

### **Accounting for Guarantees in a Foreign Currency**

At the time of authorization, EXIM records the authorization amount as the U.S. dollar equivalent of the foreign-currency obligation based on the exchange rate at that time. At the end of each fiscal year, EXIM determines the dollar equivalent of the outstanding balance for each foreign-currency guarantee based on the exchange rate at the end of the year and adjusts the loan guarantee liability accordingly.

### **Borrowings from the U.S. Treasury - Intragovernmental Debt**

EXIM's main source of debt is borrowings from the U.S. Treasury, reflected as intragovernmental Debt on the Balance Sheet. Borrowings from the U.S. Treasury are used to finance credit programs. These borrowings carry a fixed rate of interest.

### **Accounts Payable to the U.S. Treasury - Intragovernmental Other Liabilities**

Accounts Payable to the U.S. Treasury, a section of intragovernmental Other Liabilities in the Balance Sheet, are liabilities to the General Fund of the U.S. Government and include the results of the reestimate of the portfolio's expected losses as required under the Federal Credit Reform Act of 1990 (FCRA). The payable represents funds that are held in credit-reform financing accounts that are determined to be in excess of amounts needed to cover future defaults. The payable also includes expired budget authority no longer available for obligation that will be returned to the U.S. Treasury.

### **Payment Certificates – Federal Debt and Interest Payable, Public**

Payment certificates, reflected on the Balance Sheet as Federal Debt and Interest Payable represent EXIM's outstanding liability related to specific claims for which EXIM is paying the guaranteed lender as the guaranteed installments become due. Payment certificates are issued by EXIM in exchange for the foreign importer's defaulted note which was guaranteed by EXIM. Payment certificates carry the same repayment terms and interest rate as the guaranteed foreign importer's note. Payment certificates are backed by the full faith and credit of the U.S. Government and are freely transferable.

### **Fees and Premia**

EXIM charges a risk-related exposure fee under both the loan and guarantee programs that is collected on each loan disbursement or shipment of goods under the guaranteed loan policy. This fee is amortized over the life of the credit. On working capital guarantees, EXIM charges an up-front facility fee, which, due to the short-term nature of the contracts, is credited to income as collected. Premia charged under insurance policies are recognized as income using a method that generally reflects the exposure over the term of the policy.

## **Appropriated Capital**

Beginning in FY 2008, fees collected in excess of expected credit losses are used to reimburse the U.S. Treasury for appropriations provided for program and administrative costs. Appropriations received, if any, are returned to the U.S. Treasury when the period of availability ends.

Congress has appropriated certain sums specifically for EXIM's tied-aid activities. Tied aid is government-to-government concessional financing of public-sector capital projects in developing countries. Tied-aid terms usually involve total maturities longer than 20 years, lower than market interest rates and/or direct grants.

## **Capital Stock**

Capital stock, reflected on the Balance Sheet as part of Total Cumulative Results of Operations, represents the value of stock held by the U.S. government, related to EXIM's incorporation as a U.S. government corporation.

## **Imputed Financing**

A financing source is imputed by EXIM to provide for pension and other retirement benefit expenses recognized by EXIM in the Statement of Net Cost but financed by the Office of Personnel Management (OPM). EXIM follows annually updated OPM guidance when calculating the imputed cost (OPM Benefits Administration Letter, Number 25-304 dated December 2024).

## **Liquidating Account Distribution of Income**

EXIM maintains a liquidating account which accumulates the repayment on loans and claims issued prior to the FCRA. At the end of each fiscal year, EXIM transfers the cash balance in this account to the U.S. Treasury.

## **Income Taxes**

As an agency of the federal government, EXIM is generally exempt from all income taxes imposed by any governing body, whether it be a federal, state, commonwealth, local, or foreign government.

## **Classified Activities**

Accounting standards require all reporting entities to disclose that accounting standards allow certain presentations and disclosures to be modified, if needed, to prevent the disclosure of classified information.

## 2. FUND BALANCE WITH TREASURY

The status of balance as of September 30, 2025, is as follows:

| (in millions)  | FY 2025           |
|--|-------------------|
| <b>Status of Fund Balance with the U.S. Treasury</b> |                   |
| Unobligated Balance                                  | 1,262.7           |
| Obligated Balance Not Yet Disbursed                  | 1,953.2           |
| <b>Total</b>   | <b>\$ 3,215.9</b> |

The Fund Balance with Treasury is the amount held in EXIM's account with Treasury and is available for use by EXIM. The status of these funds is either unobligated or obligated.

Unobligated balances are made up of both available and expired funds. Unobligated available funds represent unexpired appropriations and offsetting collections, and funds held in credit-reform financing accounts not yet obligated. Unobligated expired funds represent appropriations and offsetting collections that are no longer available for new obligations. These expired funds are eventually canceled and sent to the U.S. Treasury in subsequent years.

Obligated balance not yet disbursed represents appropriations, offsetting collections, and funds held in the loan financing account awaiting disbursement.

## 3. DIRECT LOAN, LOAN GUARANTEES, AND EXPORT-CREDIT INSURANCE PROGRAMS, NONFEDERAL BORROWERS

EXIM offers fixed-rate loans directly to foreign buyers of U.S. goods and services. EXIM extends to a company's foreign customer a fixed-rate loan covering up to 85 percent of the U.S. contract value. The buyer must make a cash payment to the U.S. exporter of at least 15 percent of the U.S. contract value. EXIM's direct loans generally carry the fixed-interest rate permitted for the importing country and term under the "Arrangement on Guidelines for Officially Supported Export Credits" negotiated among members of the Organization for Economic Co-operation and Development (OECD).

EXIM loan guarantees cover the repayment risks on the foreign buyer's debt obligations incurred to purchase U.S. exports. EXIM guarantees to a lender that, in the event of a payment default by the borrower, it will pay to the lender the outstanding principal and interest on the loan. EXIM's guarantee covers the commercial and political risks for 85 percent of the U.S. contract value.

EXIM's export-credit insurance helps U.S. exporters sell their goods overseas by protecting them against the risk of foreign-buyer or other foreign-debtor default for political or commercial reasons, allowing them to extend credit to their international customers. Insurance policies may apply to shipments to one buyer or many buyers, insure comprehensive (commercial and political) credit risks or only political risks, and cover short-term or medium-term sales.

### Federal Credit Reform Act of 1990

The primary purpose of the FCRA is to measure more accurately the cost of federal credit programs and to place the cost of such credit programs on a basis equivalent with other federal spending.

As part of the FCRA, OMB established the Interagency Country Risk Assessment System (ICRAS) to provide a framework for uniformly measuring country risk for the U.S. government's international credit programs across the various agencies that administer them. The ICRAS methodology determines the risk levels for lending to both sovereign governments and nonsovereign borrowers.

ICRAS rates every country to which U.S. government agencies have outstanding loans or loan guarantees or are anticipating making new credits available. ICRAS rates countries based on economic and political/social variables. There are 11 sovereign and 9 nonsovereign risk categories, and each country receives two ratings: a sovereign-risk rating and a private-risk rating. ICRAS currently has risk ratings for 206 sovereign and 208 nonsovereign markets.

## FY 2025 Activity

Beginning in FY 2008, fees collected in excess of expected credit losses (offsetting collections) are used to cover, to the extent possible, EXIM's administrative costs and credit program needs for providing new direct loans and guarantees.

In FY 2025 EXIM was partially self-financing. EXIM's program revenue (i.e., in a given year, fee and interest collections from transactions that exceed the reserve requirements on those transactions) was retained as offsetting collections and used to offset the cost of new obligations in the fiscal year, including prudent reserves to cover future losses as well as administrative costs. Administrative costs are EXIM's costs to administer, service, and report on its entire credit portfolio.

EXIM repaid \$76.9 million of the \$125.0 million administrative program appropriation warrant received in FY 2025.

Subsidy program costs are obligated to cover the estimated subsidy costs at the time loans, guarantees, and insurance are committed. As the loans disburse, or when the insured or guaranteed event has taken place (generally when the related goods are shipped), the obligated amounts are used to cover the estimated subsidy costs related to the disbursements. The portion of the obligated amounts related to EXIM's lending programs is used to partially fund the loan disbursements, while the portions related to EXIM's guarantee and insurance programs are invested in an interest-bearing account with the U.S. Treasury. Prior to loan disbursement or the insured or guaranteed event, all the appropriated funds and offsetting collections are held in a non-interest-bearing U.S. Treasury account.

Subsidy program appropriations were not covered by offsetting collections and remained covered by appropriated funds for FY 2025. In FY 2025, EXIM received a \$15.0 million subsidy program budget appropriation for the cost of direct loans, loan guarantees, and insurance, which will be available to obligate until September 30, 2028.

The Office of Inspector General (OIG) received \$8.9 million in appropriated funds in FY 2025 for administrative costs related to OIG's mission.

## Allowances for Losses

The process by which EXIM determines its allowances for losses for each fiscal year involves assessing the repayment risk of the credit, which includes both commercial and political risk factors, then calculating the loss reserve based on the percentage of loss associated with the risk level assigned to the credit.

Sovereign risk is associated with an obligor that conveys the full faith and credit of its country. To rate sovereign obligors, EXIM relies on the risk levels assigned to sovereign countries by ICRAS. Nonsovereign obligors are divided into four categories for risk assessment purpose: (1) obligors in workout status; (2) obligors rated by third-party rating agencies, such as, Standard & Poor's and Moody's; (3) obligors not rated but publicly traded on local exchanges; and (4) obligors neither rated nor publicly traded on local exchanges.

After the political and commercial risks of the transaction are assessed, the transaction is assigned a risk rating based on the standard ICRAS classification. A major determinant of the risk rating is the sovereign-risk rating of the country in which the obligor is located. Credit enhancements such as the availability of liens and offshore escrow accounts are considered.

For pre-credit-reform and non-impaired loans receivable, EXIM determines the allowance using historical default and recovery rates. The allowance for losses on this exposure is calculated using the credit loss estimate method. This is an estimate of the loss expected due to credit risk and does not include non-credit factors.

Loss reserves on pre-FCRA impaired credits are determined using OMB rates. Impaired credits are generally defined as those transactions risk rated from budget cost level (BCL) 9 to 11, or on the verge of impairment due to political, commercial, operational, and/or technical events or unforeseeable circumstances that have affected the borrower's ability to service repayment of EXIM credits.

The allowance for losses for post FCRA loans, guarantees, and insurance are determined by the credit loss calculated at authorization and subsequent adjustments made to the allowance as a result of the annual reestimate.

## Reestimate on Portfolio Expected Losses

The estimated credit loss of the outstanding balance of loans, guarantees, and insurance is reestimated annually. This reestimate indicates the appropriate balance necessary in the financing accounts to ensure sufficient funds to pay future estimated claims and cover estimated losses.

EXIM uses recent historical loss experience and other factors, such as global macroeconomic environment and minimum loss rates, in developing the expected loss factors. In the event that the balance in the financing accounts exceeds the reestimate level, the difference will not be needed to cover future estimated claims and will be returned to the U.S. Treasury. When the balance in the financing accounts is less than the reestimate level, FCRA provides that the difference will be transferred to EXIM from a general appropriation account authorized for this purpose.

Every year, EXIM re-evaluates its methods for calculating the reserves needed to cover expected losses. EXIM uses historical experience to estimate the probability of default as well as the loss given default. The probability of default (PD) is the likelihood that a transaction would go into default while the loss given default (LGD) gives the estimated loss, net of recoveries and expenses, if a default were to occur. Multiplying PD times LGD provides expected loss factors across programs and budget cost level (BCL) categories. EXIM uses recent historical loss experience and other factors in developing the expected loss factors.

EXIM incorporates a quantitative and qualitative framework to calculate loss reserves. A subset of the qualitative factors are built into the quantitative framework. The quantitative framework includes factors such as loss curves for sovereign-guaranteed transactions and for asset-backed aircraft transactions. In line with industry best practices, EXIM incorporated qualitative factors that look at global macroeconomic environment and set minimum loss rates. Those not built into the quantitative framework look at minimum levels of expected losses, the global macroeconomic environment. This framework has continuously evolved and been refined over the years.

As of September 30, 2025, the credit loss reestimate for FY 1992 through FY 2025 indicated that a net of \$13.6 million of additional funds were needed in the financing accounts. The transfer of the net upward reestimate from the U.S. Treasury will take place in FY 2026.

#### **A. Direct Loans**

EXIM's loans receivable, as shown on the Balance Sheet, are net of an allowance for loan losses. The value of assets related to direct loans is not comparable to expected proceeds from the sale of the loans.

EXIM calculates the allowance for loan losses for direct loans obligated prior to FY 1992, by identifying each of the 11 BCL risk levels with a loss percentage to determine the overall allowance for credit losses as described above. Certain credits and capitalized interest included in gross loans receivable are reserved at 100 percent.

The allowance for loss calculated for direct loans obligated since the beginning of FY 1992 equals the amount of credit loss incurred to support the loan obligation. This credit loss is the amount of loss estimated to be incurred on the transaction, as previously described in this footnote. At September 30, 2025, the allowance for loan losses on credit-reform credits equaled 20.6 percent of the related outstanding loans and interest receivable balance.

At September 30, 2025, the allowance for both pre-credit-reform and credit-reform loans equaled 22.4 percent of the total loans and interest receivable.

The outstanding balances related to rescheduled installments included in loans receivable at September 30, 2025 were \$79.6 million.

Interest and fees receivable are presented in gross amount, and the corresponding allowance is presented under allowance for loan losses. The net balance of loans receivable at September 30, 2025 consists of the following:

| FY 2025 (in millions)            | Loans Receivable, Interest and Fee Allowance for Loan |                 |                     |                   |                |
|----------------------------------|---|-----------------|---------------------|-------------------|----------------|
|                                  | Gross   | Receivable      | Losses              | Direct Loans, Net |                |
| Loans Obligated Prior to FY 1992 | \$ 87.9   | \$ 65.6         | \$ (153.4)          | \$ 0.1            |                |
| Loans Obligated After FY 1991    | 6,410.8   | 145.6           | (1,352.5)           |                   | 5,203.9        |
| <b>Total</b>                     | <b>\$ 6,498.7</b>                                     | <b>\$ 211.2</b> | <b>\$ (1,505.9)</b> | <b>\$</b>         | <b>5,204.0</b> |

| (in millions)                                  | FY 2025  |
|--|----------|
| Direct Loans Disbursed During Year (Post-1991) | \$ 109.5 |

#### B. Program Cost and Reestimate Expense for Direct Loans by Component

The table below discloses the interest, defaults, fees, and reestimate amounts associated with program cost disbursed in the current fiscal year on loan authorizations made in the current fiscal year. The table also includes the current year's loss.

| (in millions)  | FY 2025         |
|--|-----------------|
| Interest   | \$ (6.5)        |
| Defaults   | 5.3             |
| Fees and Other Collections                                   | (11.4)          |
| <b>Total Program Cost</b>                                    | <b>(12.6)</b>   |
|  |                 |
| Net Reestimate - Principal                                   | 97.0            |
| Net Reestimate - Interest                                    | 50.2            |
| <b>Total Net Reestimate</b>                                  | <b>147.2</b>    |
|  |                 |
| <b>Total Direct Loan Program Cost and Reestimate Expense</b> | <b>\$ 134.6</b> |

The Interest Rate Reestimate was \$0.3 million for FY 2025.

### C. Program Cost Rates for Direct Loans by Program and Component

The program cost rates disclosed below relate to the percentage of program costs on loan authorizations made in the reporting fiscal year. Because these rates only pertain to authorizations from the current reporting fiscal year, they cannot be applied to loan disbursements in the reporting fiscal year to yield the program cost because current-year disbursements may be on loans authorized in both current and prior years.

|                            | <u>FY 2025</u> |
|----------------------------|----------------|
| Interest                   | (2.8)%         |
| Defaults                   | 5.3 %          |
| Fees and Other Collections | (6.9)%         |
| <b>Total</b>               | <b>(4.4)%</b>  |

### D. Schedule for Reconciling Direct Loan Allowance Balances

The table below discloses the components of the direct-loan allowance for credit-reform direct loans.

| (in millions)   | FY 2025        |
|---|----------------|
| <b>Post-1991 Direct Loans</b>   |                |
| Beginning Balance of the Allowance Account                                | \$ 1,234.8     |
| Current-Year Program Cost<br><i>(see Note 3B for Component Breakdown)</i> | (12.6)         |
| Program-Cost Allowance Amortization                                       | 215.2          |
| Capitalized Interest  | (112.8)        |
| Fees Recognized in Income   | (16.0)         |
| Miscellaneous Recoveries and (Costs)                                      | (103.3)        |
| <b>Ending Balance Before Reestimate</b>                                   | <b>1,205.3</b> |
| Reestimate  | 147.2          |
| <b>Ending Balance of the Allowance Account</b>                            | <b>1,352.5</b> |

### E. Defaulted Guaranteed Loans

EXIM's defaulted guaranteed loans, Receivables from Subrogated claims as shown on the Balance Sheet, is net of an allowance for defaulted guaranteed or insured loan losses. The allowance for defaulted guaranteed loans is calculated using the allowance for loss method. Loss reserves on impaired credits are determined using OMB rates. Capitalized interest included in gross defaulted guaranteed loans, which includes both guarantees and insurance programs, receivable is reserved at 100 percent.

Credit-reform foreclosed property in FY 2025 consists of one bond realized in FY 2019. The bond is valued at the net present value of the projected future cash flows associated with the property.

The total allowance was 36.7 percent of gross defaulted guaranteed loans, interest receivable, and foreclosed property at September 30, 2025.

| FY 2025 (in millions)      | Defaulted                                |                                   |                        | Allowance for<br>Loan Losses | Defaulted<br>Guaranteed<br>Loans, Net |
|----------------------------|--|-----------------------------------|------------------------|------------------------------|---------------------------------------|
|                            | Guaranteed<br>Loans Receivable,<br>Gross | Interest and<br>Fee<br>Receivable | Foreclosed<br>Property |                              |                                       |
| Obligated Prior to FY 1992 | \$ 26.9                                  | \$ 9.1                            | \$ -                   | \$ (28.4)                    | \$ 7.6                                |
| Obligated After FY 1991    | 1,501.5                                  | 23.3                              | 24.0                   | (554.0)                      | 994.8                                 |
| <b>Total</b>               | <b>\$ 1,528.4</b>                        | <b>\$ 32.4</b>                    | <b>\$ 24.0</b>         | <b>\$ (582.4)</b>            | <b>\$ 1,002.4</b>                     |

#### **F. Guaranteed Loans and Insurance**

EXIM is exposed to credit loss with respect to the amount of outstanding guaranteed loans and insurance policies in the event of nonpayment by obligors under the agreements. The commitments shown below are agreements to lend monies and issue guarantees and insurance as long as there is no violation of the conditions established in the credit agreement.

| (in millions)   | FY 2025   |                 |
|---|-----------|-----------------|
| Gross Outstanding Principal of Guaranteed Loans and Insurance, Face Value                             | \$        | 11,279.2        |
| Undisbursed Principal of Guaranteed Loans and Insurance, Face Value                                   |           | <u>8,131.9</u>  |
| <b>Total Principal of Guaranteed Loans and Insurance, Face Value</b>                                  | <b>\$</b> | <b>19,411.1</b> |
| Amount of Principal That is Guaranteed and Insured by EXIM  | \$        | 19,411.1        |
| Gross Amount of Guaranteed Loans and Insurance Disbursed During Year, Face Value                      | \$        | 5,418.3         |
| Amount of Guaranteed Loans and Insurance Disbursed During Year that is Guaranteed and Insured by EXIM | \$        | 5,418.3         |

#### **G. Liability for Loan Guarantees and Insurance**

The liability for loan guarantees and insurance balances of \$149.5 million at September 30, 2025 represent credit-reform guarantees and insurance credits.

## **H. Program Cost and Reestimate Expense for Loan Guarantees and Insurance by Component**

The table below discloses defaults, fees, and reestimate amounts associated with the program cost disbursed in the current year on loan guarantee and insurance authorizations made in the current and prior fiscal years and the current-year loss reestimate. The total program cost also includes modifications made on these authorizations.

| (in millions)   | FY 2025           |
|---|-------------------|
| Defaults  | \$ 108.6          |
| Fees and Other Collections  | (172.9)           |
| <b>Total Program Costs</b>  | <b>(64.3)</b>     |
|   |                   |
| Net Reestimate - Principal  | (101.6)           |
| Net Reestimate - Interest   | (32.0)            |
| <b>Total Net Reestimate</b>   | <b>(133.6)</b>    |
|   |                   |
| <b>Total Loan Guarantee and Insurance Program Cost and Reestimate Expense</b> | <b>\$ (197.9)</b> |

The Interest Rate Reestimate for FY 2025 was \$0.2 million.

## **I. Program Cost Rates for Loan Guarantees and Insurance by Component**

The program cost rates disclosed below relate to the percent of program costs on loan guarantee and insurance authorizations made in the reporting fiscal year which are associated with program costs. Because these rates only pertain to authorizations from the current reporting fiscal year, these rates cannot be applied to the guarantees of loans disbursed during the reporting fiscal year to yield the program cost because current year disbursements may be of loans authorized in both current and prior years.

|                            | FY 2025       |
|----------------------------|---------------|
| Defaults                   | 2.7 %         |
| Fees and Other Collections | (6.0)%        |
| <b>Total</b>               | <b>(3.3)%</b> |

### J. Schedule for Reconciling the Guarantee Loan Liability Balances

The table below discloses the components of the allowance for loan guarantees.

| (in millions)   | FY 2025      |
|---|--------------|
| <b>Post-1991 Loan Guarantees</b>  |              |
| Beginning Balance of Guarantee Loan Liability                             | \$ 162.3     |
| Current-Year Program Cost<br><i>(see Note 3H for Component Breakdown)</i> | (64.3)       |
| Claim Payments to the Lenders   | (30.1)       |
| Changes in Allowance on Loans Acquired                                    | 69.4         |
| Fees Received   | 165.4        |
| Treasury Interest Revenue/Expense   | (20.2)       |
| Other   | 0.6          |
| <b>Ending Balance Before Reestimate</b>                                   | <b>283.1</b> |
| Reestimate  | (133.6)      |
| <b>Ending Balance of Guarantee Loan Liability</b>                         | <b>149.5</b> |

### K. Administrative Costs

All of EXIM's administrative costs are attributed to the support of EXIM's mission and related loan, guarantee, and insurance programs. Administrative costs are not allocated to individual programs. Administrative costs were \$156.5 million as of September 30, 2025.

## L. Allowance and Exposure Summary

The allowance for losses for EXIM credits authorized after FCRA equates to the amount of estimated credit loss associated with the applicable loans, claims, guarantees, and insurance. Direct loans disbursed and outstanding are recognized as assets at the present value of their estimated net cash inflows. The difference between the outstanding principal of the loans and the present value of their net cash flows is recognized as the allowance for credit losses. For guaranteed loans outstanding, the present value of estimated net cash outflows of the loan guarantee and insurance is recognized as a guaranteed loan liability.

| (in millions)  | FY 2025           |
|--|-------------------|
| <b><u>Pre-Credit-Reform Allowance</u></b>                    |                   |
| Allowance for Loan Losses                                    | \$ 153.4          |
| Allowance for Defaulted Guarantees                           | 28.4              |
| <b>Total Pre-Credit-Reform Allowance</b>                     | <b>181.8</b>      |
| <b><u>Credit-Reform Allowance and Liability</u></b>          |                   |
| Allowance for Loan Losses                                    | 1,352.5           |
| Allowance for Defaulted Guarantees and Insurance             | 554.0             |
| Liability for Loan Guarantees and Insurance                  | 149.5             |
| <b>Total Credit-Reform Allowance and Liability</b>           | <b>2,056.0</b>    |
|  |                   |
| Total Allowance for Loan Losses                              | 1,505.9           |
| Total Allowance for Guarantees and Insurance                 | 731.9             |
| <b>Total Allowance and Liability</b>                         | <b>\$ 2,237.8</b> |
|  |                   |
| Total Outstanding Balance of Loans, Guarantees and Insurance | \$ 19,306.3       |
| Percent Allowance to Outstanding Balance                     | 11.6%             |
|  |                   |
| Total Exposure   | \$ 34,795.8       |
| Percent Allowance to Exposure                                | 6.4%              |

## M. Loans Receivable

The table below shows the change in net receivables, for all direct loans receivable obligated after FCRA, after FY 1991. Other non-cash reconciling items below mainly consists of the subsidy cost amortization impact on allowance for loan losses.

| (in millions)  | FY 2025        |
|--|----------------|
| <b>Beginning Balance of Direct Loans Receivable, Net</b> | \$ 6,264.9     |
| Loan Disbursements                                       | 109.5          |
| Principal And Interest Payments Received                 | (1,249.3)      |
| Interest and Fee Accruals                                | 240.7          |
| Fees Received  | (44.2)         |
| Interest Revenue On Uninvested Funds                     | (146.5)        |
| Interest Expense On Entity Borrowings                    | 311.2          |
| Subsidy Expense  | 12.6           |
| Upward Reestimate  | (227.8)        |
| Downward Reestimates                                     | 80.6           |
| Allowance For Loan And Interest Loss Adjustments         | 109.4          |
| Other Non-Cash Reconciling Items                         | (257.2)        |
| <b>Ending Balance of Direct Loans Receivable, Net</b>    | <b>5,203.9</b> |

## 4. STATUTORY LIMITATIONS ON LENDING AUTHORITY

Under its Charter, EXIM's statutory lending limit in FY 2025 was \$135.0 billion of loans, guarantees, and insurance exposure at any one time. As of September 30, 2025, EXIM's statutory authority used was as follows:

| (in millions)            | FY 2025            |
|--------------------------|--------------------|
| Outstanding Guarantees   | \$ 10,520.2        |
| Outstanding Loans        | 6,498.7            |
| Outstanding Insurance    | 759.0              |
| Outstanding Claims       | 1,528.4            |
| <b>Total Outstanding</b> | <b>19,306.3</b>    |
| Undisbursed Guarantees   | 5,588.1            |
| Undisbursed Loans        | 7,357.6            |
| Undisbursed Insurance    | 2,543.8            |
| <b>Total Undisbursed</b> | <b>15,489.5</b>    |
| <b>Total Exposure</b>    | <b>\$ 34,795.8</b> |

Transactions can be committed only to the extent that budget authority is available to cover program costs. For FY 2025, Congress placed no limit on the total amount of loans, guarantees, and insurance that could be committed in those years, provided that the statutory authority established by the EXIM's Charter of \$135.0 billion was not exceeded.

During FY 2025, EXIM committed \$8,743.8 million for direct loans, guarantees, and insurance.

EXIM has authorized \$2,070.2 million of transactions denominated in a foreign currency during FY 2025, as calculated with the exchange rate at the time of authorization. EXIM adjusts the allowance for all transactions denominated in a foreign currency using the various foreign-currency exchange rates at the end of the fiscal year.

For financial statement purposes, EXIM defines exposure as the authorized outstanding and undisbursed principal balance of loans, guarantees, and insurance. It also includes the unrecovered balance of payments made on claims that were submitted to EXIM in its capacity as guarantor or insurer under the export guarantee and insurance programs. Exposure does not include accrued interest or transactions while pending final approval. This corresponds to the way activity is charged against EXIM's overall \$135.0 billion statutory lending limit imposed by Section 6(a) (2) of EXIM's Charter.

Working capital guarantees may be approved for a single loan or a revolving line of credit, with an availability generally of one year. Guaranteed lenders do not report activity to EXIM, the entire credit is assumed to be a non-cash disbursement when the fee is paid to EXIM. The credit is recorded as repaid in one installment 180 days after the expiry date of the credit unless the Office of the Chief Financial Officer is notified before that time that a claim has been filed and approved. Under the assumption that the exporter is using the credit up to the end of the expiry period, six months provides sufficient time for the guaranteed lender to report defaults to EXIM in the event that the exporter does not repay the credit. If a claim is paid, the remaining outstanding balance of the credit associated with the claim is reduced to zero. Exposure is then reflected as a claim receivable.

Since there is typically a delay in reporting shipments under the insurance program, undisbursed balances generally remain on the books for 120 days after the expiry date to allow for the posting of shipments that took place within the period covered by the policy but were reported after the expiry date. These unreported shipments pose some liability in the form of claims that have been incurred but not yet reported (IBNR). Leaving the policy open past the expiry date provides a reserve for IBNR.

## **5. LIABILITIES NOT COVERED BY BUDGETARY RESOURCES**

EXIM's liability to employees for accrued unfunded annual leave, which was \$5.8 million as of September 30, 2025, is not covered by budgetary resources. The liability will be paid from future administrative-cost budget authority.

## 6. NON-ENTITY ASSETS

Non-Entity Assets are assets that are held by EXIM but are not available for use in its operations. At year-end EXIM accrues the current year reestimates including the downward portion, which is sent to Treasury in the following fiscal year. The downward reestimate is reflected in the Balance Sheet as an asset accounted in the Fund Balance with Treasury and as a liability accounted in the Accounts Payable to U.S. Treasury until the amount is paid to the U.S. Treasury.

| (in millions)                                | FY 2025   |              |
|--|-----------|--------------|
| <b>Intragovernmental Entity</b>              |           |              |
| Expired Funds Payable to U.S. Treasury       | \$        | 40.8         |
| <b>Intragovernmental Non-Entity</b>          |           |              |
| Downward Reestimate Payable to U.S. Treasury | \$        | 250.2        |
| <b>Amounts Payable to U.S. Treasury</b>      | <b>\$</b> | <b>291.0</b> |

## 7. DEBT

EXIM's outstanding borrowings come from two sources: direct borrowing from the U.S. Treasury and the assumption of repayment obligations of defaulted guarantees under EXIM's guarantee program via payment certificates. Payment certificates are classified as debt held by the public.

EXIM's total debt at September 30, 2025 is as follows:

| (in millions)                  | FY 2025   |                |
|--------------------------------|-----------|----------------|
| <b>U.S. Treasury Debt</b>      |           |                |
| Beginning Balance              | \$        | 11,200.4       |
| New Borrowings                 |           | 1,997.9        |
| Repayments                     |           | (3,962.5)      |
| <b>Ending Balance</b>          | <b>\$</b> | <b>9,235.8</b> |
| <b>Debt Held by the Public</b> |           |                |
| Beginning Balance              | \$        | 260.4          |
| Repayments                     |           | (144.1)        |
| Interest Accruals              |           | (0.4)          |
| <b>Ending Balance</b>          | <b>\$</b> | <b>115.9</b>   |
| <b>Total Debt</b>              | <b>\$</b> | <b>9,351.7</b> |

U.S. Treasury borrowings are repaid primarily with the repayments of medium-term and long-term loans. To the extent repayments on the underlying loans, combined with commitment and exposure fees and interest earnings received on the loans, are not sufficient to repay the borrowings, appropriated funds are available to EXIM through the reestimation process for this purpose. The full amount of the borrowings is expected to be repaid by FY 2045, which reflects when the last credit matures.

EXIM had borrowings outstanding with the U.S. Treasury of \$9,235.8 million at September 30, 2025, with a weighted-average interest rate of 2.8 percent in FY 2025.

Payment certificates are issued by EXIM in exchange for the foreign obligor's original note that was guaranteed by EXIM on which EXIM has paid a claim and carries the same repayment term and interest rate as the foreign obligor's note. Payment certificates are backed by the full faith and credit of the U.S. government and are freely transferable.

As of September 30, 2025, there are \$115.9 million in payment certificates. Maturities of payment certificate installments at September 30, 2025 are as follows:

| Fiscal Year  | Amount (\$ in millions) |
|--------------|-------------------------|
| 2026         | 88.8                    |
| 2027         | 26.6                    |
| 2028         | 0.4                     |
| 2029         | 0.1                     |
| <b>Total</b> | <b>\$ 115.9</b>         |

## 8. OTHER LIABILITIES

As of September 30, 2025, EXIM had \$100.3 million in public other liabilities with \$82.9 million representing offsetting collections, which are available to cover administrative and program costs.

| (in millions)  | FY 2025         |
|--|-----------------|
| <b>Intragovernmental</b>                               |                 |
| Employer Contributions Payable                         | \$ 0.5          |
| Other Liabilities                                      | 0.1             |
| <b>Total Intragovernmental</b>                         | <b>0.6</b>      |
| <b>Public</b>  |                 |
| <i>Other Liabilities</i>                               |                 |
| Funds Held Pending Application                         | \$ 17.0         |
| <i>Total Other Liabilities</i>                         | <i>17.0</i>     |
| <i>Advances from Others and Deferred Revenue</i>       |                 |
| Advances from Others                                   | 0.5             |
| Deferred Revenue                                       | 82.8            |
| <i>Total Advances from Others and Deferred Revenue</i> | <i>83.3</i>     |
| <b>Total Public</b>                                    | <b>100.3</b>    |
| <b>Total Other Liabilities</b>                         | <b>\$ 100.9</b> |

*(Refer to Note 6 for the remaining components of Total Other Liabilities )*

## 9. FEDERAL OPERATING LEASES

EXIM's office space in Washington, D.C., is leased from the General Services Administration (GSA) through the Public Buildings Fund, and office space in regional locations is leased through the U.S. Export Assistance Centers. Lease expenses, included in Administrative Costs on the Statement of Net Costs, were \$7.9 million in FY 2025. EXIM's occupancy agreement with GSA is cancellable and extends through FY 2030. The cost and estimates of lease payments of EXIM's office space in Washington, DC from FY 2026 to FY 2030 are as follows:

| (in millions) |               |
|---------------|---------------|
| Fiscal Year   | Amount        |
| 2026          | 7.8           |
| 2027          | 7.9           |
| 2028          | 7.9           |
| 2029          | 7.9           |
| 2030          | 2.0           |
| <b>Total</b>  | <b>\$33.5</b> |

## 10. COMMITMENTS AND CONTINGENCIES

### *Pending Litigation*

As of September 30, 2025, EXIM is involved in several legal actions. It is not possible to predict the eventual outcome of the various actions; however, it is management's opinion that there is a remote likelihood that these claims will result in a future outflow or other sacrifice of resources to such an extent that they would materially affect the financial position or results of operations of EXIM.

## 11. DISCLOSURES RELATED TO THE COMBINED STATEMENT OF BUDGETARY RESOURCES

Combined Statement of Budgetary Resources disclose total budgetary resources available to EXIM and the status of such resources at September 30, 2025. Activity impacting budget totals of the overall U.S. government budget is recorded in EXIM's Combined Statement of Budgetary Resources budgetary accounts. Activity which does not impact budget totals is recorded in EXIM's Combined Statement of Budgetary Resources non-budgetary accounts.

As of September 30, 2025, EXIM's resources in budgetary program accounts totaled \$393.6 million. As of September 30, 2025, EXIM's resources in non-budgetary financing accounts totaled \$3,311.9 million.

### *Adjustments to Unobligated Balance Brought Forward*

The unobligated balance brought forward decreased by \$1,991.6 million, from \$2,155.3 million as of September 30, 2024 to \$163.7 million as of September 30, 2025 mainly due to actual repayments of debt from prior-year balances.

### ***Permanent Indefinite Appropriations***

The FCRA requires an annual reestimate of the credit loss allowance. In the event that there is an increase in estimated defaults, there is permanent and indefinite budget authority available for this purpose. The FY 2024 upward reestimate received from the U.S. Treasury in FY 2025 was \$85.5 million, while the downward reestimate sent to the U.S. Treasury was \$242.0 million.

### ***Available Borrowing Authority and Terms of Borrowing***

EXIM in part relies on borrowings from the U.S. Treasury to help fund EXIM's loan program. U.S. Treasury borrowings are repaid primarily with the repayments of direct loans. To the extent principal and interest repayments on the underlying loans, combined with commitment and exposure fees, and interest earnings received on the loans, are not sufficient to repay the borrowings, permanent and indefinite appropriated funds are available to EXIM through the reestimation process for this purpose. The full amount of the borrowings is expected to be repaid by FY 2045. In FY 2025, EXIM had current year borrowing authority of \$2,003.1 million.

### ***Unobligated Balances***

Unobligated balances at September 30, 2025, totaled \$1,262.7 million. Of this amount, \$1,130.3 million represents the amount in the loan, guarantee, and insurance credit reform financing accounts, which are non-budgetary accounts, that is available to cover future defaults, and \$40.8 million is expired and unavailable for new obligations.

### ***Undelivered Orders***

Undelivered orders are obligations that have not yet been disbursed by EXIM. Undelivered orders for the year ended September 30, 2025 were \$10,139.3. The undelivered order amount totals are mostly attributed to non-federal sources related to EXIM's credit-reform programs.

### ***Distributed Offsetting Receipts***

Distributed offsetting receipts were \$242.0 million at September 30, 2025. Distributed offsetting receipts are amounts that EXIM collects from other Government agencies that are used to offset or reduce EXIM's budget outlays. EXIM's outlays are measured on both a gross and net basis, with net outlays being reduced by offsetting receipts (and other amounts).

### ***Differences between Combined Statement of Budgetary Resources and Budget of U.S. Government***

There are no material differences between the budgetary resources shown on the Combined Statement of Budgetary Resources and the Budget of the U.S. government. The President's FY 2026 Budget with actual numbers for FY 2025 has not yet been published. EXIM expects no material differences between the President's Budget and the FY 2025 reported results when the budget becomes available at <https://www.whitehouse.gov/omb/budget/>.

## 12. RECONCILIATION OF NET COST TO NET OUTLAYS

Budgetary accounting is used for planning and control purposes and relates to both the receipt and use of cash, as well as reporting the federal deficit. Financial accounting is intended to provide a picture of the government's financial operations and financial position, so it presents information on an accrual basis. The accrual basis includes information about costs arising from the consumption of assets and the incurrence of liabilities. The reconciliation of net outlays, presented on a budgetary basis, and the net cost, presented on an accrual basis, provides an explanation of the relationship between budgetary and financial accounting information. The reconciliation serves not only to identify costs paid for in the past and those that will be paid in the future but also to assure integrity between budgetary and financial accounting. The analysis below illustrates this reconciliation by listing the key differences between net cost and net outlays.

| (in millions)   | Intragovernmental | With the Public | FY 2025        |
|---|-------------------|-----------------|----------------|
| Net Operating Cost                                    | \$ 41.0           | \$ 24.9         | \$ 65.9        |
| <b>Components of Net Operating Cost</b>               |                   |                 |                |
| <b>Not Part of the Budgetary Outlays</b>              |                   |                 |                |
| Year-end Credit Reform Subsidy Reestimates            | -                 | (13.6)          | (13.6)         |
| Other   | -                 | 102.5           | 102.5          |
| <b>Other Financing Sources</b>                        |                   |                 |                |
| Imputed Financing Sources                             | (8.0)             | -               | (8.0)          |
| <b>Total Components of Net Operating Cost</b>         |                   |                 |                |
| Not Part of the Budget Outlays                        | (8.0)             | 88.9            | 80.9           |
| <b>Increase/(Decrease) in Assets:</b>                 |                   |                 |                |
| Direct Loan Receivable                                | -                 | (2.4)           | (2.4)          |
| Accounts Receivable                                   | -                 | (0.2)           | (0.2)          |
|   | -                 | (2.6)           | (2.6)          |
| <b>(Increase)/Decrease in Liabilities:</b>            |                   |                 |                |
| Accounts Payable                                      | -                 | 0.1             | 0.1            |
| Other Liabilities                                     | (0.1)             | 0.7             | 0.6            |
|   | (0.1)             | 0.8             | 0.7            |
| <b>Components of the Budget Outlays</b>               |                   |                 |                |
| <b>that are Not Part of Net Operating Cost</b>        |                   |                 |                |
| Effect of Prior-Year Credit Reform Subsidy reestimate | 85.5              | -               | 85.5           |
| Other   | -                 | (101.3)         | (101.3)        |
| <b>Total Components of the Budgetary Outlays</b>      |                   |                 |                |
| that are Not Part of Net Operating Cost               | 85.5              | (101.3)         | (15.8)         |
| <b>Net Outlays</b>                                    | <b>118.4</b>      | <b>10.7</b>     | <b>129.1</b>   |
| <b>Miscellaneous Items</b>                            |                   |                 |                |
| Distributed Offsetting Receipts                       | (242.0)           | -               | (242.0)        |
| <b>Total Other Reconciling Items</b>                  | <b>(242.0)</b>    | <b>-</b>        | <b>(242.0)</b> |
| <b>Total Net Outlays</b>                              |                   | \$ (112.9)      |                |
| <b>Budgetary Agency Outlays, Net (SBR)</b>            |                   |                 |                |
| Budgetary Agency Outlays, Net                         |                   | \$ (112.9)      |                |

### 13. RECLASSIFICATION OF FINANCIAL STATEMENT LINE ITEMS FOR FINANCIAL REPORT COMPILATION PROCESS

To prepare the *Financial Report of the U.S. Government (Financial Report)*, the Department of the Treasury requires agencies to submit an adjusted trial balance, which is a listing of amounts by U.S. Standard General Ledger account that appear in the financial statements. Treasury uses the trial balance information reported in the Government-wide Treasury Account Symbol Adjusted Trial Balance System (GTAS) to develop a Reclassified Statement of Net Cost and a Reclassified Statement of Changes in Net Position. Treasury eliminates intragovernmental balances from the reclassified statements and aggregates lines with the same title to develop the *Financial Report* statements. This note shows EXIM's financial statements and EXIM's reclassified statements prior to elimination of intragovernmental balances and prior to aggregation of repeated *Financial Report* line items. A copy of the 2024 *Financial Report* can be found here: <https://www.fiscal.treasury.gov/reports-statements/current-report.html> and a copy of the 2025 *Financial Report* will be posted to this site as soon as it is released.

The term "intragovernmental" is used in this note to refer to amounts that result from other components of the Federal Government.

The term "public" is used in this note to refer to Federal Government amounts that result from transactions with non-federal entities. These include transactions with individuals, businesses, non-profit entities, and state, local, and foreign governments.

#### Reclassification of Statement of Net Cost to Line Items Used for Government-wide Statement of Net Cost for the Year Ended September 30, 2025

| FY 2025 Export - Import Bank of the United States Statement of Net Cost |                | Line Items Used to Prepare FY 2025 Government-wide Statement of Net Cost |  |
|---|----------------|--|--|
| Financial Statement Line  | Amounts        | Amounts  | Reclassified Financial Statement Line    |
|   |                |  | <b>Gross Cost</b>                        |
|   |                | (3.8)  | Non-Federal Gross Cost                   |
|   |                | (3.8)  | <b>Total Non-Federal Gross Cost</b>      |
|   |                | 14.3   | Benefit Program Costs                    |
|   |                | 8.0  | Imputed Costs                            |
|   |                | 14.5   | Buy/Sell Costs                           |
|   |                | 346.6  | Borrowing and Other Interest Expense     |
|   |                | 4.2  | Other Expenses (without Reciprocals)     |
|   |                | <b>387.6</b>   | <b>Total Federal Gross Cost</b>          |
|   |                | <b>383.8</b>   | <b>Total Reclassified Gross Cost</b>     |
|   |                |  | <b>Earned Revenue</b>                    |
|   |                | (156.2)  | Non-Federal Earned Revenue               |
|   |                | (156.2)  | <b>Total Non-Federal Earned Revenue</b>  |
|   |                |  | <b>Federal Earned Revenue</b>            |
|   |                | (161.7)  | Borrowing and Other Interest Revenue     |
|   |                | (161.7)  | <b>Total Federal Earned Revenue</b>      |
| <b>Total Earned Revenue</b>   | <b>(673.0)</b> | <b>(317.9)</b>   | <b>Total Reclassified Earned Revenue</b> |
| <b>Net Costs of Operations</b>  | <b>65.9</b>    | <b>65.9</b>  | <b>Net Cost of Operations</b>            |

**Reclassification of Statement of Changes in Net Position to Line Items Used for Government-wide Statement of Changes in Net Position for the Year Ended September 30, 2025**

| FY 2025 Export - Import Bank of the United States Statement of Change in Net Position |                | Line Items Used to Prepare FY 2025 Government-wide Statement of Operations and Changes in Net Position |   |  |
|---|----------------|--|---|--|
| Financial Statement Line  | Amounts        | Amounts  | Reclassified Financial Statement Line   |  |
| <b>Net Position, Beginning Balance</b>  | <b>(353.3)</b> | <b>(353.3)</b>   | <b>Net Position, Beginning of Period</b>  |  |
| <b>UNEXPENDED APPROPRIATIONS</b>  |                |  |   |  |
| Appropriations Received   | 157.5          | 152.9  | Appropriations Received as Adjusted (Rescissions and Other Adjustments) (Federal)                                   |  |
| Other Adjustments   | (4.6)          |  |   |  |
| Rescission  | -              |  |   |  |
| Appropriations Used   | (135.3)        | (135.3)  | Appropriations Used (Federal)   |  |
| <b>CUMULATIVE RESULTS OF OPERATIONS</b>   |                |  |   |  |
| Appropriations Used   | 135.3          | 135.3  | Appropriations Expended (Federal)   |  |
| Transfer Without Reimbursement  | (61.3)         | (61.3)   | Collections for Others Transferred to the General Fund of the U.S. Government (Federal)                             |  |
| Offsetting Collections  | 99.3           | 99.3   | Other taxes and receipts (Non-Federal)  |  |
| Imputed Financing   | 8.0            | 8.0  | Imputed Financing Sources (Federal)   |  |
| Other:  |                | (8.2)  | Non-entity collections transferred to the General Fund of the U.S. Government                                       |  |
| Non-Entity Activity   | (250.2)        | (242.0)  | Accrual for Non-Entity Amounts to be Collected and Transferred to the General Fund of The U.S. Government (Federal) |  |
| <b>Net Cost of Operations</b>   | <b>65.9</b>    | <b>65.9</b>  | <b>Net Cost of Operations</b>   |  |
| <b>Net Position, Ending Balance</b>   | <b>(470.5)</b> | <b>(470.5)</b>   | <b>Net Position, End of Period</b>  |  |

#### **14. RELATED-PARTY TRANSACTIONS**

The financial statements reflect the results of agreements with the Private Export Funding Corporation (PEFCO). PEFCO, is owned by a consortium of private-sector banks, industrial companies, and financial-services institutions. It makes and purchases, from private-sector lenders, medium-term and long-term fixed-rate and variable-rate loans, which are guaranteed by EXIM to foreign borrowers to purchase U.S. made equipment "export loans."

EXIM's credit and guarantee agreement with PEFCO provides that EXIM guarantees the due and punctual payment of interest on PEFCO's secured debt obligations which EXIM has approved and grants to EXIM a broad measure of supervision over certain of PEFCO's major financial management decisions, including the right to have representatives be present in all meetings of PEFCO's board of directors, advisory board, and exporters' council, and to review PEFCO's financial and other records. However, EXIM does not have voting rights and does not influence normal operations. In September 2020 the EXIM Board of Directors unanimously voted to renew its agreement with PEFCO for 25 years.

PEFCO has an agreement with EXIM where EXIM generally provides PEFCO with an unconditional guarantee covering the due and punctual payment of principal and interest on export loans PEFCO makes and purchases. PEFCO's guarantees on the export loans plus the guarantees on the secured debt obligations aggregating \$2,960.8 million at September 30, 2025. Of the outstanding PEFCO balance of \$2,960.8 million, \$2.1 million are payment certificates to PEFCO which are not guaranteed amounts but amounts that were issued for claims filed. EXIM includes the total for guarantee, insurance, and loans and the allowance related to all of these transactions as part of its financial records.

EXIM received fees totaling \$63.1 million in FY 2025. The fees are comprised of the interest on the secured debt agreements which is accrued by PEFCO and paid to EXIM, as well as fees related to repayments on PEFCO deals guaranteed by EXIM. The total fees are included in Earned Revenue on the Statement of Net Costs.

## **15. CONTRIBUTIONS TO EMPLOYEE RETIREMENT SYSTEMS**

All of EXIM's employees whose appointments have federal status are covered by either the Civil Service Retirement System (CSRS) or the Federal Employees Retirement System (FERS).

In both FY 2025 EXIM withheld between 7.0 percent and 8.0 percent of CSRS employees' gross earnings. EXIM's contribution matches the contributions. This sum was transferred to the CSRS fund from which this employee group will receive retirement benefits.

For FERS, EXIM withheld 0.8 percent of employees' gross earnings. EXIM's contribution was 18.4 percent of employees' gross earnings in FY 2025. This sum was transferred to the FERS fund from which the employee group will receive retirement benefits. An additional 6.2 percent of gross earnings, after pre-tax deductions are withheld up to the 2025 limit of \$176,100; that sum plus matching contributions by EXIM are sent to the Social Security System from which the FERS employee group will receive Social Security benefits.

For FERS-Revised Annuity Employee (RAE), EXIM withheld 3.1 percent of employee's group earnings. EXIM's contribution was 16.5 percent of employee's gross earnings in FY 2025. This sum was transferred to the Civil Service Retirement and Disability Fund from which the employee group will receive retirement benefits. An additional 6.2 percent of gross earnings, after pre-tax deductions are withheld up to the 2025 limit of \$176,100; that sum plus matching contributing by EXIM are sent to the Social Security Administration from which the FERS employee group will receive Social Security benefits.

For FERS-Further Revised Annuity Employee (FRAE), EXIM withheld 4.4 percent of employee's group earnings. EXIM's contribution was 16.5 percent of employee's gross earnings in FY 2025. This sum was transferred to the Civil Service Retirement and Disability Fund from which the employee group will receive retirement benefits. An additional 6.2 percent of gross earnings, after pre-tax deductions are withheld up to the 2025 limit of \$176,100; that sum plus matching contributing by EXIM are sent to the Social Security Administration from which the FERS employee group will receive Social Security benefits.

FERS and CSRS employees may elect to participate in the Thrift Savings Plan (TSP). CSRS and FERS employees may contribute up to \$23,500 of Internal Revenue Service Elective Deferral Limit. In addition, FERS employees receive an agency automatic 1 percent contribution from EXIM based on the employee regular contributions. FERS employees receive agency matching contributions by EXIM up to 4 percent for a maximum EXIM contributions to the TSP of 5 percent.

Total EXIM (employer) matching contributions to the TSP, CSRS and FERS for all employees, included in Administrative Costs in the Statement of Net Costs, were approximately \$12.8 million in FY 2025.

Although EXIM funds a portion of pension benefits under the CSRS and FERS relating to its employees and makes the necessary payroll withholdings for them, it has no liability for future payments to employees under these programs and does not account for the assets of the CSRS and FERS, nor does it have actuarial data with respect to accumulated plan benefits or the unfunded pension liability relative to its employees. These amounts are reported by the OPM for the Retirement Systems and are not allocated to the individual employers. The excess of total pension expense over the amount contributed by EXIM and its employees represents the amount of pension expense which must be financed directly by OPM. EXIM recognizes an imputed cost and an imputed financing source, calculated using cost factors supplied by OPM, equal to the excess amount.

OPM also accounts for the health and life insurance programs for current and retired civilian federal employees. Similar to the accounting treatment afforded the retirement programs, the actuarial data related to the health and life insurance programs is maintained by OPM and is not available on an individual-employer basis. EXIM recognizes an imputed cost and an imputed financing source for the future cost of these other retirement benefits (ORB) at the time the employee's services are rendered. This ORB expense is calculated using cost factors supplied by OPM and must be financed by OPM.

# Required Supplementary Information

Unaudited, see accompanying Auditor's Report

## COMBINING STATEMENT OF BUDGETARY RESOURCES

Exhibit 1 displays the unaudited Combining Statement of Budgetary Resources (SBR). The SBR provides information regarding how budgetary resources were made available, as well as their status at the end of the fiscal period.

### Exhibit 1: Combining Statement of Budgetary Resources

| (in millions)  | For the Year Ended September 30, 2025 |                               |                                   |                                     |                     |
|--|---------------------------------------|-------------------------------|-----------------------------------|-------------------------------------|---------------------|
|  | Program Account                       | Direct Loan Financing Account | Guaranteed Loan Financing Account | Pre-Credit Reform Financing Account | Total               |
|  |                                       |                               |                                   |                                     |                     |
| <b>Budgetary Resources</b>   |                                       |                               |                                   |                                     |                     |
| Unobligated from Prior Year Budget Authority, Net<br>(Discretionary and Mandatory) | \$ 133.5                              | \$ -                          | \$ 30.2                           | \$ -                                | \$ 163.7            |
| Appropriations (Discretionary and Mandatory)                                       | 157.5                                 | -                             | -                                 | -                                   | 157.5               |
| Borrowing Authority (Discretionary and Mandatory)                                  | -                                     | 1,954.1                       | 49.0                              | -                                   | 2,003.1             |
| Spending Authority from Offsetting Collections<br>(Discretionary and Mandatory)    | 102.6                                 | 800.1                         | 478.5                             | -                                   | 1,381.2             |
| <b>Total Budgetary Resources</b>   | <b>\$ 393.6</b>                       | <b>\$ 2,754.2</b>             | <b>\$ 557.7</b>                   | <b>\$ -</b>                         | <b>\$ 3,705.5</b>   |
| <b>Status of Budgetary Resources</b>   |                                       |                               |                                   |                                     |                     |
| New Obligations and Upward Adjustments (Total)                                     | \$ 261.2                              | \$ 1,746.1                    | \$ 435.5                          | \$ -                                | \$ 2,442.8          |
| Unobligated Balance, End of Year:  | -                                     | -                             | -                                 | -                                   | -                   |
| Apportioned, Unexpired, End of Year  | 91.6                                  | 1,008.1                       | 122.2                             | -                                   | 1,221.9             |
| Expired Unobligated Balance, End of Year   | 40.8                                  | -                             | -                                 | -                                   | 40.8                |
| Unobligated Balance, End of Year (Total)   | 132.4                                 | 1,008.1                       | 122.2                             | -                                   | 1,262.7             |
| <b>Total Status of Budgetary Resources</b>   | <b>\$ 393.6</b>                       | <b>\$ 2,754.2</b>             | <b>\$ 557.7</b>                   | <b>\$ -</b>                         | <b>\$ 3,705.5</b>   |
| <b>Outlays, Net</b>  |                                       |                               |                                   |                                     |                     |
| Outlays, Net (Total) (Discretionary and Mandatory)                                 | \$ 133.1                              |                               | \$ (4.0)                          | \$ 129.1                            |                     |
| Distributed Offsetting Receipts (-)  | (242.0)                               | -                             | -                                 | -                                   | (242.0)             |
| <b>Agency Outlays, Net (Discretionary And Mandatory)</b>                           | <b>\$ (108.9)</b>                     |                               | <b>\$ (4.0)</b>                   | <b>\$ (112.9)</b>                   |                     |
| <b>Disbursement, Net (Total) (Mandatory)</b>                                       | <b>\$ (1,067.4)</b>                   |                               | <b>\$ 37.3</b>                    |                                     | <b>\$ (1,030.1)</b> |

## Other Information

Unaudited, see accompanying Auditor's Report

### SUMMARY OF FINANCIAL STATEMENT AUDIT

| <b>Audit Opinion</b> |                   | Unmodified |          |              |                |
|----------------------|-------------------|------------|----------|--------------|----------------|
| <b>Restatement</b>   |                   | No         |          |              |                |
| Material Weakness    | Beginning Balance | New        | Resolved | Consolidated | Ending Balance |
| N/A                  | 0                 | 0          |          |              | 0              |

### PAYMENT INTEGRITY INFORMATION ACT REPORTING

The Payment Integrity Information Act of 2019 (PIIA) requires agencies to review and assess all programs and activities they administer and identify those determined to be susceptible to significant improper payments.

OMB requires that agencies assess all programs with annual outlays greater than \$10.0 million for improper payment risk at least once every three years. EXIM complies with PIIA and OMB requirements through the activities of its Payment Integrity program, which comprises four separate programs: short-term authorizations, medium-term authorizations, long-term authorizations, and cash-control disbursements. Risk assessments over each of the four programs are performed at least once every three years. In the interim years, risk assessments evaluating programs that experience any significant legislative changes and/or significant increase in funding will be performed to determine if the agency continues to be at low risk for making significant improper payments, at or above the threshold levels set by OMB. In FY 2024, EXIM conducted a comprehensive risk assessment of all four programs and determined that none of its programs were risk-susceptible for making significant improper payments in the preceding year. . Throughout FYs 2024 and 2025, EXIM remained compliant with PIIA and applicable OMB guidance, including Circular A-123, Appendix C, *Requirements for Payment Integrity Improvement*, revised as of March 5, 2021 and Circular A-136, *Financial Reporting Requirements*, revised July 14, 2025. In accordance with PIIA and OMB requirements, the next risk assessment of all four programs will be performed in FY 2026.

PIIA also requires Federal agencies to report annually on their efforts according to guidance promulgated by OMB. Annually, EXIM submits data to OMB as part of the Annual Data Call. It is collected and published on [www.paymentaccuracy.gov](http://www.paymentaccuracy.gov) which provides current and historical information about improper payments made under Federal programs, as well as extensive information about how improper payments are defined and tracked. For detailed results of EXIM's compliance efforts under PIIA, please refer to the paymentaccuracy.gov. As part of the Annual Data Call, EXIM also submits the agency's designated Payment Integrity Point of Contact to OMB, as required.

## **Do Not Pay Initiative**

As reported in the Annual Data Call, EXIM complies with all aspects of the Do Not Pay Initiative through its Character, Reputational, and Transaction Integrity “CRTI” process. All transactions in the three authorization-based payment programs (Short, Medium, and Long-Term) undergo CRTI checks. As a part of CRTI, names of participants are searched within a database clearing house of over 400 databases to determine compliance with a variety of “Know your Customer” (KYC) and EXIM due-diligence requirements.

EXIM does not disburse funds directly to payees but through the U.S. Department of Treasury Secured Payment System. Funds disbursed by the Department of Treasury go through payment integration in which the Do Not Pay portal automatically matches all the files against a list of selected databases that includes the System for Award Management (SAM) exclusion records.

## **Recovery Audit Plan**

As reported in the Annual Data Call, EXIM reviewed all its programs and activities and determined that they are not susceptible to making significant improper payments at or above the threshold levels set by OMB. While recovery audits are one tool for identifying and recovering overpayments, performing recovery audits, the agency will incur costs for contractors or other entities to have highly skilled accounting specialists and fraud examiners, using state of the art tools and technology, to examine payment records and supporting documentation. Therefore, it was determined that it is not cost-effective to conduct recovery audits to identify and recover overpayments.



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## Independent Auditors' Report

President & Chairman and Inspector General  
Export-Import Bank of the United States:

### Report on the Audit of the Financial Statements

#### *Opinion*

We have audited the financial statements of Export-Import Bank of the United States (EXIM), which comprise the balance sheet as of September 30, 2025, and the related statements of net cost and changes in net position, and combined statement of budgetary resources for the year then ended, and the related notes to the financial statements.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the EXIM as of September 30, 2025, and its net cost, changes in net position, and budgetary resources for the year then ended in accordance with U.S. generally accepted accounting principles.

#### *Basis for Opinion*

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS), the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and Office of Management and Budget (OMB) Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*. Our responsibilities under those standards and OMB Bulletin No. 24-02 are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the EXIM and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### *Other Matter - Interactive Data*

Management has elected to reference to information on websites or other forms of interactive data outside the Agency Management Report to provide additional information for the users of its financial statements. Such information is not a required part of the financial statements or supplementary information required by the Federal Accounting Standards Advisory Board. The information on these websites or the other interactive data has not been subjected to any of our auditing procedures, and accordingly we do not express an opinion or provide any assurance on it.

#### *Responsibilities of Management for the Financial Statements*

Management is responsible for the preparation and fair presentation of the financial statements in accordance with U.S. generally accepted accounting principles, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

#### *Auditors' Responsibilities for the Audit of the Financial Statements*

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not

a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and OMB Bulletin No. 24-02 will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and OMB Bulletin No. 24-02, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of EXIM's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about EXIM's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

#### *Required Supplementary Information*

U.S. generally accepted accounting principles require that the information in the Management's Discussion and Analysis and Required Supplementary Information sections be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Federal Accounting Standards Advisory Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with GAAS, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

#### *Other Information*

Management is responsible for the other information included in the *Agency Management Report*. The other information comprises the Payment Integrity Information Act Reporting but does not include the financial statements and our auditors' report thereon. Our opinion on the financial statements does not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the financial statements, or



the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

**Other Reporting Required by *Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated January 16, 2026 on our consideration of EXIM's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of this report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of EXIM's internal control over financial reporting or on compliance. Those reports are an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the EXIM's internal control over financial reporting and compliance.

*KPMG LLP*

Washington D.C.  
January 16, 2026



KPMG LLP  
Suite 12000  
1801 K Street, NW  
Washington, DC 20006

**Independent Auditors' Report on Internal Control Over Financial Reporting and  
on Compliance and Other Matters Based on an Audit of Financial Statements  
Performed in Accordance With *Government Auditing Standards***

President & Chairman and Inspector General  
Export-Import Bank of the United States:

We have audited, in accordance with the auditing standards generally accepted in the United States of America, the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, and Office of Management and Budget Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*, the financial statements of Export-Import Bank of the United States (EXIM), which comprise the balance sheet as of September 30, 2025, and the related statements of net cost and changes in net position, and combined statement of budgetary resources for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated January 16, 2026.

**Report on Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements as of and for the year ended September 30, 2025, we considered EXIM's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of EXIM's internal control. Accordingly, we do not express an opinion on the effectiveness of EXIM's internal control. We did not test all internal controls relevant to operating objectives as broadly defined by the *Federal Managers' Financial Integrity Act of 1982*.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We identified a certain deficiency in internal control, described in the accompanying Exhibit A, *Information Technology Controls Need Improvement*, that we consider to be a significant deficiency.

**Report on Compliance and Other Matters**

As part of obtaining reasonable assurance about whether EXIM's financial statements as of and for the year ended September 30, 2025 are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The



results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* or OMB Bulletin No 24-02.

#### **EXIM's Response to Findings**

*Government Auditing Standards* requires the auditor to perform limited procedures on EXIM's response to the findings identified in our engagement and described in Exhibit B. EXIM's response was not subjected to the other auditing procedures applied in the engagement to audit the consolidated financial statement and, accordingly, we express no opinion on the response.

#### **Purpose of This Report**

The purpose of this report is solely to describe the scope of our testing of internal control and the results of that testing, and not to provide an opinion on the effectiveness of EXIM's internal control. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering EXIM's internal control. Accordingly, this communication is not suitable for any other purpose.

*KPMG LLP*

Washington D.C.  
January 16, 2026

### **Significant Deficiency**

#### **Information Technology Controls Need Improvement**

The following control deficiency in the area of Information Technology (IT) logical access, was identified for the financial reporting system.

##### **Condition:**

During FY 2025, we noted that EXIM management did not design and implement sufficient controls to ensure that only authorized users are allowed access to (b) (3) (B) for the financial reporting system.

##### **Cause/Effect:**

EXIM management did not perform a sufficient risk assessment to identify the risk that additional privileged users, beyond the intended user group, could (b) (3) (B).

Without effective controls (b) (3) (B), there is an increased risk that unauthorized individuals may gain access (b) (3) (B), which could adversely impact the integrity of the financial reporting system and its data.

##### **Criteria:**

The following criteria were considered in the evaluation of the significant deficiency presented in this exhibit:

- The Standards for Internal Control in the Federal Government issued by the Comptroller General of the United States Principle No. 7, *Identify, Analyze, and Respond to Risks*, and Principle No. 10, *Design Control Activities*.
- National Institute of Standards and Technology Special Publication 800-53, Security and Privacy Controls for Federal Information Systems and Organizations, Revision 5, Release 5.1.1, specifically security control requirements IA-2 *Identification and Authentication (Organizational Users)*, and AC-2 *Account Management*.

##### **Recommendation:**

We recommend that EXIM design, document, and implement controls to ensure that logical access (b) (3) (B) is restricted to only authorized users.



**DATE:** January 15, 2026

**TO:** Eric Rivera, Assistant Inspector General for Audits

**THROUGH:** Ravi Singh, Chief Financial Officer

**FROM:** Howard Spira, Senior Vice President and CIO & CAIO

**SUBJECT:** EXIM Management Response to the Draft Report:

*Independent Audit of the EXIM Bank of the US Financial Statement as of and for the Fiscal Year Ended 2025 (Report No. OIG-AR-26-01)*

RAVI SINGH

Digitally signed by RAVI SINGH  
Date: 2026.01.15 15:47:52 -05'00'

HOWARD SPIRA

Digitally signed by HOWARD SPIRA  
Date: 2026.01.15 14:10:48 -05'00'

Dear Mr. Rivera,

Thank you for providing the Export-Import Bank of the United States (“EXIM” or “EXIM Bank”) management with the Office of Inspector General’s (“OIG”) *Independent Audit of the EXIM Bank of the US Financial Statement as of and for the Fiscal Year Ended 2025 (Report No. OIG-AR-26-01)*, dated January 16, 2026 (the “Report”). Management appreciates the OIG’s professional and thorough approach throughout this audit.

EXIM management supports the OIG’s work, which directly complements our ongoing efforts to improve internal processes. We extend our gratitude to the OIG for their professional conduct during this audit. The recommendations provided serve as a valuable tool for enhancing our internal controls and fostering greater accountability.

EXIM recognizes the importance of strengthening IT access controls to enhance our operational security and fiscal stewardship. EXIM is already taking steps to address these findings as part of our commitment to continuous improvement and operational excellence.

We appreciate the collaborative nature of this engagement. The OIG’s efforts to protect EXIM resources from fraud, waste, and abuse align with our core mission. We look forward to our continued partnership as we implement these improvements to achieve our shared goals.

**Recommendation:** We recommend that EXIM design, document, and implement controls to ensure that logical access (b) (3) (B) is restricted to only authorized users.

**Management response:** EXIM Bank concurs with the recommendation. EXIM bank will design, document, and implement controls to ensure that logical access is restricted to only authorized users.

CC:

The Honorable John Jovanovic, President and Chairman of EXIM Board of Directors  
Katherine Bowles, Senior Vice President and Chief of Staff  
Victoria Coleman, Deputy General Counsel  
Kenneth Tinsley, Senior Vice President and Chief Risk Officer  
Michaela Smith, Director of Audit and Internal Controls Programs  
Hakan Keles, Vice President - Controller