



Pillar 3 Disclosure Report 2015

Table of Contents

1. Introduction.....	3
2. General Risk Management Framework.....	4
2.1. Risk management objectives and policies	4
2.2. Governance	9
2.3. Use of stress tests	10
2.4. Remuneration policy	10
2.5. Scope of application.....	13
3. Regulatory Capital.....	13
3.1. Own funds.....	13
3.2. Capital requirements	14
4. Credit risk.....	15
4.1. Exposure to credit and counterparty risk	16
4.2. Use of ECAIs.....	23
5. Market risk	23
6. Operational risk.....	23
7. Exposure to interest rate risk on positions not included in the trading book	26
8. Unencumbered assets.....	26
9. Liquidity risk	27
10. Leverage	28
11. Qualifying Requirements for the use of particular instruments or methodologies.....	29
11.1. Use of credit risk mitigation techniques.....	29
12. Appendix.....	31
12.1. List of Disclosure Requirements Part Eight of CRR.....	31
12.2. COMMISSION IMPLEMENTING REGULATION (EU) No 1423/2013	32
12.3. COMMISSION DELEGATED REGULATION (EU) 2015/1555.....	48
12.4. COMMISSION IMPLEMENTING REGULATION (EU) 2016/200.....	50

1. Introduction

The Bank's Pillar III Disclosure report provides detailed disclosures about the approaches the Bank takes to managing risk and assessing capital adequacy. The report is prepared in accordance with the CRD IV/CRR package on public disclosure and related Pillar 3 disclosure requirements. Additional relevant information may be found in the Bank 2015 Financial Report, which includes the bank statutory financial statements under EU Accounting Directives and IFRS.

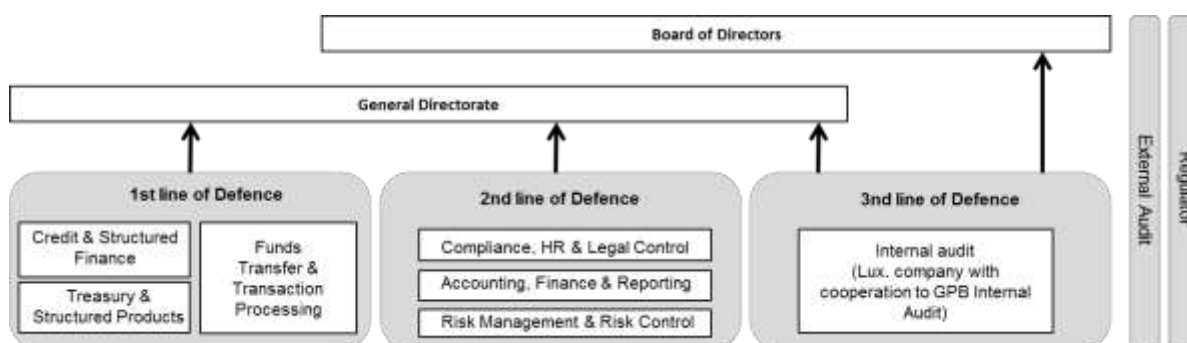
The report has the following structure. Chapter 2 provides a summary of the Banks's risk governance and management. It includes the main features of the Banks's operational plan, risk management organization, risk appetite framework, and risk management operational guidelines. It also describes the Internal Capital Adequacy Assessment Process ('ICAAP') at the bank, which includes the following components: a risk appetite statement, a risk identification process, economic capital allocation, internal limit system and internal risk reporting. Chapter 3 contains the core information of the report: the Banks's capital adequacy and risk-weighted assets (RWA) break-down. The subsequent chapters cover respectively credit, market, operational and interest rate risk on positions not included in the trading book. Chapter 8 summarizes data about the amount of unencumbered assets of the bank and Chapter 9 and 10 provide information on the measurement of liquidity risk and leverage at the Bank, respectively.

2. General Risk Management Framework

2.1. Risk management objectives and policies

Taking into account the requirements of the Risk Management Circular, the Bank applies a ‘three lines of defence’ model in order to implement risk management across various departments and divisions. The three lines of defence model distinguish among three groups (or lines) involved in effective risk management:

- functions that take or acquire risks under a predefined policy and limits and carry out operational controls (referred to herein as risk owners or first line of defence);
- support functions, including the financial and accounting function, the IT function, and the compliance and risk control functions, that contribute to the independent risk control;
- the internal audit function that provides independent, objective and critical review of the first two lines.



Thus, the operational controls of the risk owners (including day-to-day controls by the operating staff, ongoing critical controls carried out by the staff in charge of the administrative processing of transactions, and controls carried out by the members of the General Directorate on the activities or functions which fall under their direct responsibility) build the first line of defence. The risk control and compliance oversight functions established by the General Directorate are the second line and the internal audit - with its independent review - makes a third line of defence. In the three-line concept the Board of Directors and the General Directorate are primary stakeholders served by the defence “lines” and they are the parties that are responsible to ensure that the risk management model is reflected in the organization’s processes. In doing so, the following elements of the model have to be implemented in the Bank:

- internal control system has to be structured in accordance with the three-line of defence model;

- each line of defence has to be supported by clear appropriate policies and definitions of their roles and responsibilities;
- there shall be proper coordination and communication among the separate lines of defence to foster efficiency and effectiveness and to minimize the duplication of efforts;
- lines of defence should not be combined or coordinated in a manner that compromises their effectiveness and the application of the segregation of duties principle."

As a distinguished part of its Pillar II risk management framework, GBP established an Internal Capital Adequacy Assessment Process ('ICAAP'). The ICAAP includes the following components: a risk appetite statement, a risk identification process, economic capital allocation, internal limit system and internal risk reporting.

The ICAAP is adequately documented in the bank's internal policy document "Own Funds and Liquidity Policy". The ICAAP is a system allowing the Bank to assess and maintain, on an ongoing basis, the amounts, types and distribution of internal capital that it considers adequate to cover the nature and level of risks to which it is or might be exposed. The Bank's ICAAP is designed in accordance with the requirements set out in the CSSF Circular Letters 06/273, 07/301 and 09/403. The following general principles apply to the Bank's ICAAP:

- The ICAAP is essentially an internal process adapted to the Bank's organisation and its specific operational needs
- The ICAAP is integrated to the Bank's decision and management processes
- The ICAAP fully reflects all the risks (including liquidity risk) to which the Bank is or could be exposed (current and forward looking ICAAP)
- The ICAAP ensures that the Bank maintains, on an ongoing basis, an amount/type/distribution of internal capital appropriate in relation to risks incurred;
- The ICAAP strategy (general principles and objectives regarding risk taking and internal capital management), methodology, internal processes as well as results and related decisions are duly documented;
- The Risk Management & Risk Control Department (the "**Risk Management & Risk Control Department**") assesses and monitors the state of risks to which the Bank is exposed. The Risk Management & Risk Control Department includes this aspect in its annual summary report to be provided to the CSSF. It assists the General Directorate in the ICAAP process by providing to the latter its own conclusions and recommendations on the risk assessment pursuant to the ICAAP

The Existence of ICAAP is subject to a periodic review at least once a year to be performed by the internal audit ("**Internal Audit**") and compliance department (the "**Compliance Department**").

Capital Adequacy Assessment Process is closely linked to the strategy of the bank for the further development and is based on the budgeting process of the Bank. The ICAAP is integrated in the Bank's decision and management process and reflects all the risks to which

the Bank is or could be exposed. The ICAAP is subject to a periodic review in order to ensure that:

- The coverage of risks remains comprehensive and adapted to the scale, diversity & complexity of Bank's activities.
- And that the amount and the distribution of internal capital are appropriate in relation to the business activities and risks incurred.
-

At least once a year, as well as following any significant change in the risk profile or business plan, the General Directorate prepares a report (the "**ICAAP Report**") on:

- The adequacy of the ICAAP to the Bank's needs and organisation;
- The Bank's current and expected future risk profile and the adequacy of the risk management policy established by the General Directorate;
- The internal capital planning and adequacy, as well as the adequacy of this Policy;
- The impact of the internal capital management on prudential own funds adequacy.

The ICAAP Report is prepared by the General Directorate in cooperation with the Risk Management & Risk Control Department. The Risk Management & Risk Control Department prepares in particular the risk descriptions and analyses contained in the ICAAP Report and, where applicable, it makes necessary recommendations. If the Risk Management & Risk Control Department does not share the aforementioned descriptions and analyses of the ICAAP Report, it shall explicitly mention it in its annual summary report in which it includes its own assessments. The Board of Directors validates the ICAAP Report.

An integral part of GBP's ICAAP is the risk identification and assessment process. The business activities of the Bank are inevitably linked to the acceptance of risks. The business policy of the Bank is conservative in its orientation. Subsequently, the Bank main principle is to manage risks responsible. The formulated risk strategy is thus aligned with the business strategy, and reviewed at least once a year. The risk strategy consist of risk policy principles, the organisation of risk management, the overall risk profile of the bank and the risks sub-strategies regarding the main Bank-specific risk types as specified below. As of 31.12.2015 the Bank has identified the following categories of risks:



To evaluate the risk strategy of the Bank, the Risk Management function of the Bank is presenting to the Board of Directors on an annual basis its Risk Assessment which takes into account all risks the Bank is exposed or might be exposed to. The annual risk assessment takes into account the current risk positioning of the Bank, in comparison with the previous year and has also a forward looking element.

Risk Appetite

The Risk appetite expresses the maximum level of risks the Bank is prepared to accept to reach its business and strategic objectives. The main element of the Risk appetite framework is the strategic business plan of the bank, which consist of a medium term business plan and the annual business plan. The financial and regulatory ratios applying to the annual business plan are constantly reported and approved by the Board of Directors.

The medium term business plan defines in detail the planned business volumes, the transformation of the business volumes into risk-weighted –assets and the required capital in relation to the eligible capital of the bank. The resulting capital ratios are constantly monitored and a stress testing is performed to demonstrate that the total eligible capital is sufficient to cover the required capital even under stress.

The Bank is also planning in detail its funding base and the structure of the required funding to comply with the LCR and NSFR ratio. Additional planning is exercised for the required derivate volumes which are required for Asset –Liability-Management and the transformation into required capital. In addition the Bank is planning in detail income and expenses and is using a funding cost structure to derive the net interest margin as a key component of the profit and loss calculate pre-provisions.

For the calculation of the lump Sum provisions on risk weighted assets, the Bank has developed a new rating system, based on PD and LGD which will allow a more precise calculation of the provisions. The calculated lump sum provisions on counterparty risk will

also be used as a benchmark for the definition of the maximum risk appetite for the credit portfolio and the securities portfolios.

As a further instrument to develop and control the risk appetite framework the Bank has developed a set of key risk indicators and key performance indicators. The key risks and performance indicators are meant to provide an early warning system for the Bank on a monthly basis. The indicators are measured against internal benchmarks and trigger events and demonstrate the development of the indicators over time. The trigger events are annually reviewed by Risk Management, which is also responsible for the issuance of the report. The key risks and performance report is presented and discussed with the Board of Directors in every board meeting.

Management believes that the risk management system in place and the risk profile associated with the business strategy of the Bank are adequate.

The following responsibilities are identified:

Board of Directors

The Board of Directors is responsible for:

- Setting the risk strategy, the risk capacity and the risk appetite
- Approval of internal risk limits
- Approving on an annual basis the risk and capital management processes of the Bank

General Directorate

The General Directorate is responsible for:

- Implementing the GBPL management strategy , by setting a management structure, internal controls, organizations and systems
- Overseeing and managing the risk profile and capital management of GPBL
- Approving standards, concepts and methodologies for controlling risks and managing capital within the principles approved by the Board of Directors
- Approving the Risk Guidelines (Risk Charter) and the Own Funds & Liquidity policy
- Communicating the Risk Guidelines & Own Funds & Liquidity Policy within the Bank
- Periodically reviewing the Adequacy and implementation of the Risk Policy and Capital Policy as well as underlying processes & controls
- Reporting to the Board of Directors on the adequacy of the risk and capital management framework

Risk management & Risk Control

Risk Management & Risk control, which is a function independent from business lines, is responsible for:

- The development, implementation and monitoring of Bank's risk control principles, frameworks, limits and processes
- The coordination and compilation of the key risk reports
- Acting as a single point of entry for any new initiatives (new products / new business lines)
- Compilation and reviewing of the ICAAP documentation
- The review of the risk appetite and the assessment of stress scenarios together with respective departments
- Ensuring that a formal update of the reviewed ICAAP with the subsequent ICAAP report occurs on an annual basis at the beginning of each calendar year prior to the first Board of Directors Meeting. The formal update shall be performed in Risk Management & Risk Control Department, shall be supported by the Accounting Department and by the Compliance department; the subsequent approval shall be provided by General directorate before being submitted to the Board of Directors.
- Management of the Bank also ensures that the Risk Management & Risk Control function remains proportionate to the scale diversity and complexity of the activities of the Bank and the organization and has in its disposal the tools and resources in order to perform its duties in an effective and efficient manner.

Compliance

The Compliance Function is in charge with the management and mitigation of the compliance risks, and provides support to the Risk Function in the global risk assessment of the institution.

Compliance function reviews the ICAAP Report before it being presented to the General Directorate and to the Board of Directors and ensures that the ICAAP Process is operated effectively.

Business Lines

The heads of business departments are responsible for the identification, management & monitoring of the arising risks in their dedicated business areas. Even if the function could not always be properly segregated, it shall be clearly specialized and assigned.

Accounting department

Accounting is responsible for the monitoring of minimum capital requirements and capital adequacy ratio. Accounting regularly assesses the necessary level of capital, monitors that the regulatory minimum levels are fulfilled at all time and regularly reports the capital situation to other departments and to General Directorate.

2.2. Governance

The composition of the Board of Directors and General Directorate can be found on the Bank's website. Mr. Thomas Kiefer is also a director of GPB Asset Management S.A.

Selection criteria

The policy on “Appointment of Specific Functions and assessment of suitability of members of Management Body and Key Functions Holders” regulates the appointment of specific function holders and the assessment of the suitability of members of the Management Body and Key Function Holders. It defines the fundamental principles of the Bank for the appointment and succession of Key Function Holders. It also requires the yearly evaluation of all relevant persons, in order to ensure that the Bank is staffed with knowledgeable and experienced personnel.

2.3. Use of stress tests

In February 2008, the CSSF issued the Circular 08/338 requiring that banks stress their non-trading book activities to interest-rate risk. Stress tests are used to analyse the impact of catastrophic events on the capital of the Bank over a time horizon of one year. The objective of this assessment is to ensure that the Bank’s risk mitigation controls, capital and the capital contingency plan can withstand the consequences of a high-impact low-likelihood event.

Within the ICAAP process and in line with the Bank’s stress testing programme, three stress tests have been performed in relation to the risk categories the Bank regards as the most relevant based on its current and envisaged business model. The first two stress tests relate to capital, whereas the third stress test related to liquidity, admitting that capital is not always the best way to cope with liquidity shortages.

The CSSF proposes in its Circular 08/338 to have a scenario of a shift of the interest yield curve of 200 bps. Due to the fact, that the market risk is very low, because GPBL is not engaged in trading activities for its own account and because the Bank has no significant positions in derivatives, the Bank considers the proposed scenario by CSSF as adequate for the Bank. The stress test is performed on all interest rate risk positions. A regulatory market risk reporting is sent to CSSF on a semi-annual basis. The effects on the capital are as follows: - 293.0 TEUR in case of the increase of interest yield curve (+200 bps) and 363.9 TEUR in case of decrease of interest rate curve (-200 bps).

The Bank pursues a conservative approach by adding the stressed capital impact in full to the Pillar II capital requirements, without deducting Pillar I capital requirements for the respective exposures/situations.

2.4. Remuneration policy

Proportional Application

Based on the internal assessment preceding the elaboration and adoption of the Remuneration Policy, given the size of GPBL, its internal organisation, the nature and the scope of its activities, the low level of risk profile and risk appetite of the Bank, GPBL intends to rely on a proportional application of the applicable regulatory requirements at the level of the institution.

Based on the proportionality principle and in light of the regulatory guidance provided, GPBL is thus not required to set up a remuneration committee and the Policy will not further provide for requirements as regards the pay-out process of Variable Remuneration of Material Risk Takers in relation to Variable Remuneration in non-cash instruments, retention and deferral nor as regards ex post incorporation of risk for Variable Remuneration.

Remuneration of the staff and the management

Remuneration of Staff shall be in line with the conservative business strategy and the long-term interests and the underlying values of wealth preservation and sustainable growth.

GPBL's overall remuneration structure therefore emphasises paying Fixed Remuneration determined on an annual basis. In addition, GPBL may grant on a purely discretionary basis, an amount of Variable Remuneration to be paid at the end of the year to each member of Staff in relation to his or her professional activity for GPBL and taking into account a performance assessment as set out below.

Fixed Remuneration shall be the major part of Total Annual Remuneration and sufficient not to create any kind of dependency of Staff on Variable Remuneration. Variable Remuneration shall not represent more than 100% of the Fixed Remuneration for all Staff. Variable Remuneration must not limit GPBL's ability to sustainably maintain or recover an appropriate capital base.

Guaranteed Variable Remuneration shall be exceptional, may only be allowed in connection with the hiring of Staff and shall be limited to a maximum period of one year. Furthermore, there shall be no contractual severance entitlements which do not reflect actual performance achieved by the relevant Staff before leaving GPBL.

Fixed remuneration

Base salary

The base salary is a fixed amount of cash paid through monthly payments for each of the twelve months of the relevant calendar year or for the corresponding number of months if employment of the relevant member of Staff started or ceased during the relevant calendar year.

The base salary reflects each individual Staff member's particular set of skills, function and experience. The base salary is reviewed annually comparing it with internal and external benchmarks so as to ensure that it is in line with the market and industry standards and practices.

Specific adjustments may be made to the base salary during a business year in case of a change of function, promotion or the granting of additional responsibilities.

The individual base salary paid will be in line with the requirements of the classification as per the official convention (Convention Collective Bancaire, “CCB”) for the Staff covered by such convention. For the Staff not covered by such convention, the base salary will be determined by the Management or the Board, depending on the case.

Contractually agreed benefits

In specific cases, GPBL may offer benefits to Staff to be hired or relocated. Such benefits may take the form of relocation allowances as well as health insurance, housing, education allowances for children of Staff members, defrayal of transport, or a company car.

Such benefits are granted as an individually determined package.

Variable Remuneration

Variable Remuneration shall take the form of a cash bonus and shall be paid out in the following calendar year. GPBL does not reward its staff individually with Variable Remuneration based on individual financial performance, profitability, nor any other forms that may encourage risk-taking behaviour.

The possible individual bonus is based on an annual assessment of performance for each Staff member, determined in light of the perception of the efforts it has put in discharging of his/her responsibilities, the dedication to the fulfilment of the business strategy at the level of his/her responsibilities and success in carrying out specific assignments in the course of the year.

In case of a positive assessment, an individual bonus may, on a discretionary basis, be proposed by the Management to the members of the Board. This additional payment is not a contractual right. The gross amount allocated to each individual Staff member may represent between 0 % and 100 % of its Fixed Remuneration.

Remuneration of the members of the Board

The members of the Board receive in this capacity Remuneration determined by the Shareholder, excluding any form of Variable Remuneration, so as to preserve their independence of judgement. This Remuneration takes the form of an annual base fee.

Identification and Remuneration of the material risk takers

Based on the internal assessment preceding the elaboration and adoption of the Policy, GPBL has concluded that only the Management makes decisions regarding the investments and acceptable risk structure of the balance sheet of GPBL. The activity of the Management may thus in practice have a material impact on GPBL's risk profile. Consequently, the members of the Management have been considered as Material Risk Takers for the purposes of the Policy.

Quantitative information (on accrual basis)

	Senior Management and Management
	For the year 2015 EUR thousand
Members (average headcount)	7.8
Total fixed remuneration (in TEUR)	3,232
<i>of which: fixed in cash</i>	3,232
Total variable remuneration (in TEUR)	-
Additional information regarding the amount of total variable remuneration	
Article 450 h(iii) CRR – total amount of outstanding deferred variable remuneration awarded in previous periods and not in year 2015 (in TEUR)	-
Number of beneficiaries of guaranteed variable remuneration (new sign-on payments)	-
Total amount of guaranteed variable remuneration (new sign-on payments) (in TEUR)	-
Number of beneficiaries of severance payments	1
Total amount of severance payments paid in year 2015 (in EUR)	120
Article 450 h(vi) – Highest severance payment to a single person (in EUR)	120

The amounts of remuneration for the financial year and the number of beneficiaries are also disclosed in Note 19.2 of the Annual Accounts.

2.5. Scope of application

The Bank holds no participating interest and is not obliged to establish consolidated accounts.

3. Regulatory Capital

3.1. Own funds

In accordance with its obligations under the European Directive on Capital Adequacy, the Bank is required to maintain sufficient own funds to cover the risks it is or could be exposed to while ensuring compliance with its commitments and continuity of its services. The own funds of GPBL are based on the recent figures and are composed of the Tier 1 capital only, which consists of Eligible Capital. GPBL does not hold any Tier 2 capital as per 31 December 2015. In 2015 the subscribed capital of the Bank was twice increased through additional Tier 1 capital injections made by the sole shareholder Gazprombank (JSC). Additional 10 Million

EUR were paid in in January 2015 and further capital injection of 50 Million EUR in November 2015.

The Bank's general management of own funds and liquidity is governed by the "Own Funds and Liquidity Policy" document.

The following table shows the composition of own funds and required funds as per year-end 2015 in comparison to year-end 2014.

<i>EUR million</i>	31.12.2015		31.12.2014	
	Annual accounts	Regulatory purposes	Annual accounts	Regulatory purposes
Paid up capital	80.0	80.0	20.0	20.0
Reserves	(7.9)	(7.9)	(1.3)	(1.8)
Intangible assets	(0.7)	(0.5)	(1.0)	(0.6)
Net profit / loss of the current year	(5.5)	(5.5)	(6.6)	(6.5)
Total own funds	65.9	66.1	11.1	11.1

A further capital increase of EUR 50 million has been completed in March 2016 through the issuance of 50,000 new shares of the Bank having a nominal value of EUR 1,000. All newly issued shares were subscribed by the sole shareholder of the Bank to support the further development of the Bank's business.

3.2. Capital requirements

The total risk exposure amounts and Pillar I capital requirements by risk category as per 31 December 2015, compared to the year before, are given in the following table:

<i>EUR million</i>	31 December 2015		31 December 2014	
	Risk exposure amount	Capital requirement	Risk exposure amount	Capital requirement
Credit risk	79.6	6.4	14.5	1.2
Market risk	-	-	-	-
Operational risk	2.7	0.2	3.2	0.3
Credit valuation adjustment	0.4	0.03	-	-
Total Pillar I	82.7	6.6	17.6	1.4

Putting the total Pillar I risk exposure amount in relation to the Bank's own funds as per 31 December 2015, the Bank has a CET1 ratio of 80.0% which is well above the regulatory minimum 10.5%.

Combining Pillar I and Pillar II capital planning, the Bank's total internal capital requirements as per 31 December 2015 are as follows:

<i>EUR million</i>	31 December 2015
Pillar I capital requirement	6.6
- of which credit risk	6.4
- of which market risk	-
- of which operational risk	0.2
- of which credit valuation adjustment	0.03
Pillar II capital requirement	46.4
- of which 200bp interest rate stress test	0.02
- of which credit risk stress test	28.5
- of which business risk stress test	17.9
Total internal capital requirement	53.0

Relating this to the Bank's available own funds, the following picture emerges:

<i>EUR million</i>	31 December 2015
<i>Available capital</i>	
Total own funds	66.3
<i>Required capital</i>	
Pillar I	6.6
Pillar II	46.4
<i>Excess capital</i>	13.3

Hence the Bank is sufficiently capitalised to cope with the material sources of risk it faces, both in a business as usual as well as in a severe stress situation. Even when deducting the capital impact of the stress events from the available own funds, the (stressed) CET1 ratio remains well above the regulatory minimum of 10.5% and amounts to 24.2%.

4. Credit risk

Credit risk arises from all transactions that create actual, contingent or potential claims against counterparties. The credit risk is the most important risk for the Bank and is divided into the three categories of default risk, country risk and settlement risk. The default risk is the risk that counterparties may fail to meet their contractual payment obligations, whereas country risk defines the risk that a loss may arise for the following reasons in any country: deterioration of economic situation, nationalisation and expropriation of assets, foreign exchange controls as well as transfer risk. The settlement risk is the risk that the settlement or clearing of transactions in form of exchange of cash, securities or other assets may fail.

The main business of the Bank dealing with counterparty risk is the lending business. The authorisation of loans is governed by detailed guidelines and directives stating the condition,

including comprehensive credit analyses, for any loan to be made. These directives and guidelines also cover the monitoring of outstanding loans. The Bank is using a rating system and classifies all loan transactions into six categories. For third party banks and to assess the Issuer risk, the Bank is applying the ratings issued by internationally recognised rating agencies. The Board of Directors receives a regular overview of the ratings of all counterparties. The Bank also uses a system of country limits that are regularly set and monitored by the Board of Directors. To limit credit risks in respect of loans, the Bank has defined lending norms in its business regulations. The granting of loans is covered by authorisation regulations. These cover the credit items, which are allocated to four credit categories, and also govern the limit amounts.

The control measures implemented by the Bank, in order to monitor and limit the counterparty and credit risk, focus on analysis of the financial standing and reputation of the borrowers, the existence and sufficiency of collateral pledged as security for loan facilities, and periodic reviews of the creditworthiness of borrowers.

Wrong-way risk

Wrong-way risk is defined as the risk that occurs when "exposure to a counterparty is adversely correlated with the credit quality of that counterparty".

The Bank uses FX Swaps to manage the FX position. A potential correlation between the underlying of the derivatives and the debtor is considered low.

4.1. Exposure to credit and counterparty risk

Loans and advances to credit institutions

Loans and advances to credit institutions are analysed by geographic sector risk concentration as follows:

	31.12.2015	31.12.2014
	EUR	EUR
Luxembourg	7,995,548	12,849,501
OECD countries (other than Luxembourg)	35,542,179	2,188,317
Other countries	23,475,207	10,289,837
	67,012,934	25,327,655

Loans and advances to customers

Loans and advances to customers are analysed as follows:

31.12.2015	31.12.2014
EUR	EUR

Luxembourg	3,546	1,200
OECD countries (other than Luxembourg)	4,848	4,968,559
Other countries	43,855,888	2,468,019
	43,864,282	7,437,778

Bonds and other fixed-income transferable securities

Bonds and other fixed-income transferable securities are analysed as follows:

	31.12.2015	31.12.2014
	EUR	EUR
Luxembourg	15,842,883	-
OECD countries (other than Luxembourg)	52,910,566	-
	68,753,449	-

The Bank uses the Mark-to-Market method for measuring exposure value.

The credit exposure and the corresponding counterparty risk of the Bank towards customers was EUR 43.9 million (2014: 7.4 million), of which EUR 34.7 million with a lifetime over one year to five years and EUR 9.1 million over 5 years. All loans and advances were made to corporate customers and purchased from the Shareholder in December 2015 either by way of assignment or by way of funded sub-participation. For all loans and advances to customers the Bank applies a risk weighting of 100%.

The loans and advances to credit institutions amounted to EUR 67 million (2014: 24 million) with a lifetime of less than 3 months. The Bank applies a rating based approach for calculating the risk weighting of its exposure towards its banking counterparties. The bank also applies strict quality criteria for accepting banks as counterparty risk.

For all accepted banking counterparties, the Bank has a limit system in place which takes individual exposures for different form of counterparty risk into account as well as an overall limit on a counterparty or a counterparty group. The limit system is at least once a year reviewed and approved by the Board of Directors.

In 2015 the Bank purchased EUR 69.4 million (2014: nil) Bonds and other fixed-income transferable securities. The Bank acquired these securities only as underlying in conjunction with performance linked deposits. The credit risk, as well as the market risks, related to these securities, was entirely transferred to holders of corresponding deposits. The Bank applies equally strict rules when dealing with the risk of default or decline of creditworthiness of issuers of securities bought by the Bank for its own portfolio.

EUR million

31 December 2015

Risk exposure

Capital

	amount	requirement
Central Governments or Central Banks	-	-
Institutions	30.8	2.5
Corporates	48.8	3.9
Retail	0.09	0.007
Other items		-
Total credit risk	79.6	6.4
Credit valuation adjustment	0.4	0.03

The gross positive fair value of contracts, collateral amount and net risk exposure are disclosed in Note 3.3 of the Annual Accounts. The Bank had no netting benefit, netted current credit exposure and net derivative credit exposure as at the reporting date. The distribution of exposures by counterparty type, broken down by exposure classes, is also disclosed in Note 3.3 of the Annual Accounts.

The total amount of exposures after accounting offsets and without taking into account the effects of credit risk mitigation and the residual maturity breakdown of all the exposures, broken down by exposure classes are disclosed in Note 3.1 of the Annual Accounts.

Required funds for credit risk as per 31.12.2015

Credit Risk (Standardized approach)	31.12.2015 (EUR)	31.12.2014 (EUR)
Central Governments or Central Banks	-	-
Institutions	2'460'699	657'054
Corporates	3'902'682	491'271
Retail	7'346	8'167
Other items	-	-
Total capital required for credit risk	6'370'727	1'156'492
Credit Valuation Adjustment	33'197	-

The control measures implemented by the Bank, in order to monitor and limit credit risk, focus on analysis of the financial standing and reputation of the borrowers, the existence and sufficiency of collateral pledged as security for loan facilities, and periodic reviews of the creditworthiness of borrowers.

Based on the methods, how credit risk is managed at GPBL, for the time being it has been decided not to develop any specific internal methodology for the allocation of capital to credit risk. Thus, the Bank has conservatively decided to use the result of the Standardized Approach for its quantification of the credit risk. The standardized risk approach increases the risk sensitivity of the capital framework by recognizing that different counterparties within the same loan category present different risks to the lending institution. Thus, instead of placing all

commercial loans in the 100% risk weighting basket, the standardized approach takes into account the credit rating of the borrower and additional risk mitigating collaterals.

The Bank considers only cash pledged under Luxembourg Law and guarantees provided as eligible credit risk mitigating assets. For the counterparty risk related to banks, GPBL takes external ratings into account. The Bank is also using netting agreements to mitigate credit risks. GPBL has legally enforceable netting agreements for on balance sheet exposures (loans and deposits) and off-balance sheet exposures (derivatives) for which the Bank may calculate capital requirements on the basis of net credit exposures, subject to specific regulatory conditions. The Bank monitors encumbered assets, which consist of assets pledged as collateral against an existing liability and other assets which are otherwise explicitly restricted such that they cannot be used to secure funding.

The establishment of loan allowances requires objective evidence of impairment and a reliable estimation about the future cash flows of the financial asset(s) concerned. In addition a formal decision needs to be taken by the respective Business owner and the Risk Control department and approved by the competence owner. During 2015 no specific loan allowances have been established. The Bank has defined and described in its directives the notion of forbearance. The granting of a forbearance measure could constitute an impairment trigger, meaning that the loan would be assessed for impairment.

Loans are non-performing (past due) if at least one of the following payments has not been fully executed or re-negotiated more than 90 days after due date:

- Interest payments;
- Commission payments;
- Amortizations (partial principle repayments or full principal repayment).

If the payments for interest, commissions and/or administration are overdue, the face value of the loan is also to be considered as non-performing. Loans to the borrowers in liquidation are always considered non-performing. Loans with special conditions based on the (lack of) creditworthiness (e.g. material reductions in interest rates with interest being below the banks refinancing cost) are also considered non-performing.

Non-performing loans are to be considered on an individual basis. Interests and commissions for irrecoverable loans are stopped being accrued.

The main indicators of an impaired loan are:

- Considerable financial difficulties of the borrower;
- Effectively occurred breach of the contract (e.g. failure or delay of interest or face value settlement);
- Loan conditions to the favor of the client in connection with his financial difficulties that would not be granted under normal circumstances;
- High probability of bankruptcy or need for restructuring of the borrower;

- Recording of value adjustments with profit and loss impact for the particular assets in a prior reporting period;
- Disappearance of an active market for the particular financial asset based on financial difficulties;
- Prior experiences in connection with debt collection which lead to a conclusion that the total face values of the loan will not be collectible;
- Foreign currency restrictions imposed by the national authorities of the country of the borrower in case where loans are denominated in currencies other than the local currency of the borrower.

Loans are classified as impaired if the borrower will unlikely be able to fulfill his obligations. Individual loan loss provision should be created for the supposable unrecovered part of loan as well as for the outstanding interests.

The existing individual loan provisions are to reassess at each reporting date, based on the annual review of the impaired loans. The recovery amount of the loan and the corresponding loan loss provision are to be adjusted in connection with possible collateral at the liquidation value and with consideration to the credit standing of the debtor. Should any circumstances indicate that the recovery amount of the loan changes significantly, the provision should be reassessed immediately.

If no uncertainty remains about the timing and amount of the outstanding loan recoverability, the provision shall be:

- Released in case of the repayment;
- Written off in case of the certainty that no repayment will occur.

The Bank recognizes the impairment of assets held to maturity in the investment portfolio on an individual basis, if there is objective evidence of impairment as a result of one or more events occurring after initial recognition. The need for impairment is analyzed based on an impairment test.

The approaches and methods of credit risk adjustments are also described in Notes 2.8 and 14 of the Annual Accounts.

The tables below analyse the level of primary financial instruments of the Bank with respect to their remaining maturities. Financial instruments excluded from the trading portfolio are disclosed at the carrying amount.

The distribution of the exposures by industry or counterparty type is provided in Note 3.3 of the Annual Accounts.



	Primary non-trading instruments (in EUR) 31.12.2015					Total	Average primary non-trading instruments over 2015
	less than 3 months	> 3 months to 1 year	> 1 year to 5 years	more than 5 years	no maturity		
Balances with central banks	12,364,597	-	-	-	-	12,364,597	7,732,398
Loans and advances to credit institutions	67,012,934	-	-	-	-	67,012,934	46,170,295
Loans and advances to customers	13,717	-	34,739,268	9,111,297	-	43,864,282	25,651,030
Bonds and other fixed-income transferable securities	18,639,397	18,802,929	31,056,580	254,543	-	68,753,449	34,376,725
Total financial assets	98,030,645	18,802,929	65,795,848	9,365,840	-	191,995,262	113,930,447
Non-financial assets	-	-	-	-	2,592,900	2,592,900	2,125,806
Total assets	98,030,645	18,802,929	65,795,848	9,365,840	2,592,900	194,588,162	116,056,253
Amounts owed to credit institutions	14,128,963	-	-	-	-	14,128,963	14,894,108
Amounts owed to customers	59,984,724	19,109,663	31,490,249	254,671	-	110,839,307	59,451,892
Total financial liabilities	74,113,687	19,109,663	31,490,249	254,671	-	124,968,270	74,346,000
Non-financial liabilities	-	-	-	-	3,021,643	3,021,643	2,350,993
Total liabilities	74,113,687	19,109,663	31,490,249	254,671	3,021,643	127,989,913	76,696,993



	Primary non-trading instruments (in EUR) 31.12.2014						Average primary non-trading instruments over 2014
	less than 3 months	> 3 months to 1 year	> 1 year to 5 years	more than 5 years	no maturity	Total	
Balances with central banks	3,100,199	-	-	-	-	3,100,199	1,550,100
Loans and advances to credit institutions	25,327,655	-	-	-	-	25,327,655	21,628,518
Loans and advances to customers	7,437,778	-	-	-	-	7,437,778	3,718,889
Total financial assets	35,865,632	-	-	-	-	35,865,632	26,897,506
Non-financial assets	-	-	-	-	1,658,712	1,658,712	1,551,516
Total assets	35,865,632	-	-	-	1,658,712	37,524,344	28,449,022
Amounts owed to credit institutions	15,659,253	-	-	-	-	15,659,253	7,829,627
Amounts owed to customers	8,064,477	-	-	-	-	8,064,477	4,032,239
Total financial liabilities	23,723,730	-	-	-	-	23,723,730	11,861,865
Non-financial liabilities	-	-	-	-	1,680,342	1,680,342	1,180,019
Total liabilities	23,723,730	-	-	-	1,680,342	25,404,072	13,041,884

4.2. Use of ECAIs

The institute employs ratings of the following three international rating agencies: Standard & Poors, Moody, Fitch. The institution applies ratings for credit institutions, central banks and corporates.

The following table shows the credit quality steps for the exposure value and the fully adjusted exposure value after CRM:

EUR million	Credit Quality Step	31-Dec-15	
		Exposure Value	Fully adjusted Exposure Value after CRM
Central Governments or Central Banks	1	12.4	12.4
Institutions	2-3	15.0	15.0
	4	64.2	64.2
Total institutions		79.2	79.2
Corporates	Other	972.9	48.7
Retail	Other	0.1	0.1
Total		1'064.6	140.4

5. Market risk

The bank has a limited interest risk exposure that will increase as part of new strategy. Market risk is going to be managed via VaR incl. development of stress scenarios and no trading book activities are planned that will lead to no increase in strict FX limitation policy planned.

The Bank has limited exposure to market risk assured through minimum possible internal FX-limit and no open internal interest rate limits. The Bank did not enter into proprietary trading activities and did not acquire securities for an own investment portfolio. The securities bought in 2015 were only used as underlying assets linked to clients deposits. The credit risks as well as the market risks related to these securities were entirely transferred to the holder of the corresponding deposits. The main task of the trading desk was to handle execution of client orders in accordance with the Bank's Order & Best Execution policy.

6. Operational risk

Operational risk is the potential loss resulting from inadequate or failed internal processes, people or systems, or from external causes, whether deliberate, accidental or natural. It includes risks related to legal, compliance and tax matters.

The Bank has an "Operational Risk Policy" in place, which sets up the principles of the operational risk management in the Bank.

To comply with applicable rules on outsourcing and the risk related to the outsourcing of clearly defined services the Bank has an “outsourcing policy” in place.

Operational risk is measured using the Basic Indicator Approach (BIA). The calculation is based on the arithmetic average of the last three year’s sum of revenues, multiplied by 15%. The calculation of the simple arithmetic average shall be based on the positive amounts. If, for any given reason, the sum of revenues is equal to zero or negative, this figure shall not be taken into account in the calculation of the average for the determination of the Basic indicator. The calculation performed by GPBL is based on financial figures from the financial regulatory reporting based on local regulatory reporting standards (FINREP).

Required funds for operational risk as per 31.12.2015

	31.12.2015 EUR	31.12.2014 EUR
Operational risk (Basic indicator approach)	215,790	254,282

Mitigation of risk is performed through the set-up of an operational risk framework in order to ensure that all risks are properly managed and controlled. All identified risks are tracked and monitored in the Risk Inventory and reported via the Key Risk Indicators framework. Mitigation of operational risks is also achieved through:

- Segregation of duties and elimination of conflicts of interests
- Adapting appropriate operations and administrative systems to the Bank’s activities
- Maintaining an adequate internal control environment
- Maintaining an effective Compliance Function
- Maintaining an effective Risk Management & Risk Control Function

The separate reporting of compliance function as well as risk management function also form a part of operational risk management.

Current status and outlook:

With the increase of eligible capital in 2015 and in March 2016, the Bank will increase its activities in the business lines prescribed by the new business strategy. This leads to an increased operational risk in the business lines and the processing, booking, accounting and disclosure afterwards. Concerning operational risk the following topics have to be considered:

- The new business strategy leads also to the point that the IT implementation is not yet finalised and new increasing business requirements have to be met.
- The internal processes & controls of the Bank are designed and implemented. The efficiency / quality of the processes need to be improved in line with the increased quality of transactions / business activities.

At the current stage the small organization of the Bank does not allow a proper and solid assignment of some deputy functions. In line with the business expansion this point will be mitigated via the hiring of qualified required personnel and the adaption of the organizational structure. In order to mitigate the risk of external events, the Business Continuity Concept is implemented and was tested.

The numerous audits / reviews that are performed by the internal / external audit functions as well as the necessity to comply with the Group requirements form an additional stimulation to the Bank to have a proper operational / organizational set up.

To cope with the regulatory requirements and the above described growth in conjunction with the new business strategy the implementation of an incident reporting framework is foreseen for 2016, indicating inter alia the number, the amounts and the types of incidents. This tool aims to control, measure and manage the risks resulting from the operational side of the business.

For operational risk management and mitigation purposes it is foreseen for 2016 to set up a risk and control self-assessment framework together with remedial actions to take or being available.

Mitigating measures

As described above, management of operational risks will become more important, because of new products and businesses. The increasing complexity of products and processes will require additional staff with solid know how and experience in their functions; IT to be improved and additional functionalities are required to meet the business requirements; compliance, risk management and ICS need to be developed in parallel with business growth.

The “Key Risk Indicator Report” is published monthly by Risk Management & Risk Control. Here the predefined and BoD-approved key risk indicators concerning operational risk of the Bank (internal) and operational risk group (internal & group) are shown for the last three months.

Key factors impacting legal, compliance, and tax risk:

The “Key Risk Indicator Report” as per 31 December 2015 shows a high number of clients within compliance risk category 3 and PEP clients which is closely related to the on boarding of private clients. This topic is mitigated by the clearly defined and implemented KYC requirements & compliance review procedures.

The same report also shows a substantial number of alerts created in compliance filter related to payments; this fact is driven by the sanctions and embargos against some Russian companies, the Parent Bank and the Bank itself. This leads to additional legal opinions regarding services provided by the Bank as well as in regard to the Bank’s clients.

Although the number of overdue audit/regulatory recommendations has been triggered in the above mentioned report, they refer to minor issues to clarify, verify or finally approve the outstanding item.

The Bank expects no tax issues in current as well as in future year due to the low complexity of the provided services and subsequent simplicity of the tax reporting

7. Exposure to interest rate risk on positions not included in the trading book

As the considered funding source is mainly denominated in EUR while the most part of the budgeted loan portfolio is in USD, the bank will have to increase its FX swap portfolio to match the currency structure of asset and liability sides of the balance sheet. This may result in increase of the overall exposure to both interest and liquidity risks. The Bank will thoroughly monitor and target its balance sheet structure in a way optimizing its interest rate exposure as well as incorporate respective stress tests to assess respective impact on its financial result and capital base. Potential liquidity outflows resulting from exchange of variation margin on such FX swap transactions will be properly addressed in relevant limits applied to liquidity profile of the bank under stress conditions.

In order to meet the expected complexity of asset and liability structure as well as ensure compliance with applicable regulatory requirements the Bank introduced and further develops ALM Function.

In the calculation of the Interest Rate Risk position, we measure the interest rate gap as per the contractual maturity dates. The loan portfolio is taken into account into interest rate risk up to reprising date. We do not take yet into account loan prepayments, which means that all loans are considered to mature as per the contractual date. On-call liquidity is considered to mature overnight. The Interest Rate Gap is measured at the beginning of each day for the end of previous business day. The interest rate risk is mainly constituted from the mismatch between on the liability side, the on-call liquidity, and on the asset side: the loan portfolio to corporates, the HTM portfolio composed of Russian euro-bonds (excluding the CLD linked bonds).

8. Unencumbered assets

The figures shown in the tables below correspond to the 2015 median values. The table below shows the unencumbered and encumbered assets.

EUR million				
	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
Assets of the reporting institution				
Loans on demand				
Equity instruments				
Debt securities			49.1	49.1
Loans and advances other than loans on demand				
Other assets			1.4	

The table below shows the collateral received by the Bank related to the unencumbered and encumbered assets.

<i>EUR million</i>		Unencumbered
	Fair value of encumbered collateral received or own debt securities issued	Fair value of collateral received or own debt securities issued available for encumbrance
Collateral received by the reporting institution		49.3
Loans on demand		
Equity instruments		
Debt securities		49.1
Loans and advances other than loans on demand		0.2
Other collateral received		

9. Liquidity risk

Liquidity risk appetite of the Bank is defended at Board of Directors level and is developed in line with the Group liquidity requirements. It takes into account the Bank's valid business strategy and assumes the level of liquidity risk that the Bank is willing to take, with a view to ensure survival over a defined period of stress on a standalone basis.

The Bank develops and maintains sound frameworks, systems and processes to support the management of liquidity according to the liquidity risk appetite. All processes are specified with clearly delineated roles and responsibilities to ensure smooth implementation.

The Bank measures liquidity risk based on analysis of its liquidity profile under potential stress-scenarios. It regularly conducts liquidity stress test to understand the likely impact of potential developments in the Bank's business, and external market conditions on its liquidity profile, to assess whether current exposures still remain within the liquidity risk appetite. The outcomes of such analysis serve as an input to liquidity contingency planning.

The Bank defines the following types of stress test scenarios:

- BCBS-required tests where specifications are provided by BCBS recommendations and eventually by the local regulation;
- ALM-defined stress tests agreed with Risk Management and Control and approved by ALCO;
- Ad hoc stress tests at the discretion of ALM team, which includes sensitivity analyses and testing of potential new scenarios.

The stress scenarios are approved and reviewed at least annually or more frequently when a situation requires so. Based on the outcomes of liquidity stress tests the Bank creates and maintains Liquidity Buffer to ensure that it can sustain stress events on a predetermined Survival Period and keeps applicable prudential liquidity ratios on acceptable level.

The Liquidity Buffer is formed from highly liquid assets that are clearly segregated from all other assets and securities in terms of MIS accounting systems as well as liquidity representation and is split into three layers. The Bank regularly analyses assets kept in the Liquidity Buffer in terms of their potential refinancing under stress conditions as well as estimates amount of required Liquidity Buffer with available eligible assets. Respective corrective measures are made, when necessary.

In order to manage its exposure to liquidity risk the Bank sets up a set of liquidity risk limits as well as EWIs ensuring compliance with applicable liquidity prudential limits. To ensure compliance with the LCR the Bank has implemented:

- A “Daily ALM Report” containing inter alia a dynamic view of the LCR as well as
- A “Treasury Scenario Daily LCR Impact Calculator” to be able to calculate the influence of relevant transactions on the LCR.

The Bank develops and reviews a Liquidity contingency plan in order to define a set of measures and instruments that shall be applied to ensure its solvency under stress conditions. For this purpose the Bank elaborates a system of EWIs, thresholds linking it to the overall level of liquidity emergency for the Bank and a set of standard actions to consider.

10. Leverage

The leverage ratio calculation in the bank serves as a non-risk-based ratio in addition to the existing risk-based capital requirements. The leverage ratio was initially foreseen at 3% and is calculated as follows:

$$\text{Leverage Ratio} = \frac{\text{Capital Measure (Tier 1 Capital)}}{\text{Exposure Measure}}$$

The final proposal and report from the European Commission should be available at the end of 2016, with a possible binding introduction at the end of 2018. The Bank discloses the information on the leverage ratio based on the definition of the capital measure specified in point (a) of paragraph 1 of Article 499 CRR. Currently the Bank already takes into account the leverage ratio to ensure that all commercial activities based on the agreed business plan are in line with the leverage ratio requirements, especially in terms of managing the risk of excessive leverage:

Following the CRR “risk of excessive leverage” means the risk resulting from an institution's vulnerability due to leverage or contingent leverage that may require unintended corrective

measures to its business plan, including distressed selling of assets which might result in losses or in valuation adjustments to its remaining assets.

The Bank has included the Leverage Ratio as a strategic key performance indicator in the section “Sound risk management and prudential supervision”. The capital planning and the related stress testing contain the leverage ratio to avoid excessive leverage.

11. Qualifying Requirements for the use of particular instruments or methodologies

11.1. Use of credit risk mitigation techniques

The Bank considers only cash pledged under Luxembourg Law and guarantees provided as eligible credit risk mitigating assets. The Bank is also using netting agreements to mitigate credit risks. GPBL has legally enforceable netting agreements for on balance sheet exposures (loans and deposits) and off-balance sheet exposures (derivatives) for which the Bank may calculate capital requirements on the basis of net credit exposures, subject to specific regulatory conditions. The Bank monitors encumbered assets, which consist of assets pledged as collateral against an existing liability and other assets which are otherwise explicitly restricted such that they cannot be used to secure funding. From a regulatory point of view, the Bank mainly accepts the pledging of financial assets (particularly client deposits) as collateral as well as personal guarantees and first demand guarantees. The Bank has no credit derivative exposures.

As at 31 December 2015 the Bank used the following credit risk mitigation techniques:

- Time deposits of clients, which are linked to the performance of an underlying asset acquired by the Bank for such purposes (“credit-linked deposit” or “CLD”). The securities bought in 2015 were only used as such underlying assets linked to clients’ deposits. The credit risks, as well as the market risks related to these securities were entirely transferred to the holder of the corresponding deposits.
- The participation of other banks in syndicated loan commitments is shown as a financial guarantee received.



<i>EUR million</i>		31-Dec-15
Credit Quality Step	Credit Quality Step - Rating Translation	CRM exposure
1-3	AAA to BBB-	0
4	BB+ to BB-	853.6
5-6	B+ to below B-	0
No Credit Quality Step	Not applicable	70.6
Total		924.2

12. Appendix

12.1. List of Disclosure Requirements Part Eight of CRR

CRR Article Disclosed Medium: Primary location Pillar 3 report

Title II Technical Criteria on Transparency and Disclosure

Article 435	Risk management objectives and policies
Article 436	Scope of application
Article 437	Own funds
Article 438	Capital requirements
Article 439	Exposure to counterparty credit risk
Article 440	Capital buffers
Article 441	Indicators of global systemic importance
Article 442	Credit risk adjustments
Article 443	Unencumbered assets
Article 444	Use of ECAs
Article 445	Exposure to market risk
Article 446	Operational risk
Article 447	Exposures in equities not included in the trading book
Article 448	Exposure to interest rate risk on positions not included in the trading book
Article 449	Exposure to securitisation positions
Article 450	Remuneration policy
Article 451	Leverage

Title III Qualifying requirements for the use of particular instruments or methodologies

Article 452	Use of the IRB Approach to credit risk
Article 453	Use of credit risk mitigation techniques
Article 454	Use of the Advanced Measurement Approaches to operational risk
Article 455	Use of Internal Market Risk Models



12.2. COMMISSION IMPLEMENTING REGULATION (EU) No 1423/2013

of 20 December 2013

laying down implementing technical standards with regard to disclosure of own funds requirements for institutions according to Regulation (EU) No 575/2013 of the European Parliament and of the Council

ANNEX II

Capital instruments' main features template

Capital instruments main features template ⁽¹⁾		
1	Issuer	
2	Unique identifier (eg CUSIP, ISIN or Bloomberg Identifier for private placement)	
3	Governing law(s) of the instrument	
	<i>Regulatory treatment</i>	
4	Transitional CRR rules	
5	Post-transitional CRR rules	
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	
7	Instrument type (types to be specified by each jurisdiction)	
8	Amount recognised in regulatory capital (currency in million, as of most recent reporting date)	
9	Nominal amount of instrument	
9a	Issue price	
9b	Redemption price	
10	Accounting classification	
11	Original date of issuance	
12	Perpetual or dated	
13	Original maturity date	
14	Issuer call subject to prior supervisory approval	
15	Optional call date, contingent call dates and redemption amount	
16	Subsequent call dates, if applicable	
	<i>Coupons / dividends</i>	
17	Fixed or floating dividend/coupon	
18	Coupon rate and any related index	
19	Existence of a dividend stopper	
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	
21	Existence of step up or other incentive to redeem	
22	Noncumulative or cumulative	
23	Convertible or non-convertible	
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	



28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	
36	Non-compliant transitioned features	
37	If yes, specify non-compliant features	
(1) Insert 'N/A' if the question is not applicable		



Own funds disclosure template

Own funds disclosure template			Regulation (EU) No 575/2013 Article Reference
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts		26 (1), 27, 28, 29
	of which: instrument type 1		EBA list 26 (3)
	of which: instrument type 2		EBA list 26 (3)
	of which: instrument type 3		EBA list 26 (3)
2	Retained earnings		26 (1) (c)
3	Accumulated other comprehensive income (and other reserves)		26 (1)
3a	Funds for general banking risk		26 (1) (f)
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1		486 (2)
5	Minority interests (amount allowed in consolidated CET1)		84
5a	Independently reviewed interim profits net of any foreseeable charge or dividend		26 (2)
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments		Sum of rows 1 to 5a
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)		34, 105
8	Intangible assets (net of related tax liability) (negative amount)		36 (1) (b), 37
9	Empty set in the EU		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		36 (1) (c), 38,
11	Fair value reserves related to gains or losses on cash flow hedges		33(1) (a)
12	Negative amounts resulting from the calculation of expected loss amounts		36 (1) (d), 40, 159
13	Any increase in equity that results from securitised assets (negative amount)		32 (1)
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		33(1) (b)
15	Defined-benefit pension fund assets (negative amount)		36 (1) (e), 41
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)		36 (1) (f), 42
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		36 (1) (g), 44



18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10 % threshold and net of eligible short positions) (negative amount)		36 (1) (h), 43, 45, 46, 49 (2) (3), 79
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10 % threshold and net of eligible short positions) (negative amount)		36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79
20	Empty set in the EU		
20a	Exposure amount of the following items which qualify for a RW of 1250 %, where the institution opts for the deduction alternative		36 (1) (k)
20b	of which: qualifying holdings outside the financial sector (negative amount)		36 (1) (k) (i), 89 to 91
20c	of which: securitisation positions (negative amount)		36 (1) (k) (ii), 243 (1) (b), 244 (1) (b), 258
20d	of which: free deliveries (negative amount)		36 (1) (k) (iii), 379 (3)
21	Deferred tax assets arising from temporary differences (amount above 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		36 (1) (c), 38, 48 (1) (a)
22	Amount exceeding the 15 % threshold (negative amount)		48 (1)
23	of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		36 (1) (i), 48 (1) (b)
24	Empty set in the EU		
25	of which: deferred tax assets arising from temporary differences		36 (1) (c), 38, 48 (1) (a)
25a	Losses for the current financial year (negative amount)		36 (1) (a)
25b	Foreseeable tax charges relating to CET1 items (negative amount)		36 (1) (l)
27	Qualifying AT1 deductions that exceed the AT1 capital of the institution (negative amount)		36 (1) (j)
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)		Sum of rows 7 to 20a, 21, 22 and 25a to 27
29	Common Equity Tier 1 (CET1) capital		Row 6 minus row 28
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts		51, 52
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards		
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1		486 (3)
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		85, 86



35	of which: instruments issued by subsidiaries subject to phase out	486 (3)
36	Additional Tier 1 (AT1) capital before regulatory adjustments	Sum of rows 30, 33 and 34
Additional Tier 1 (AT1) capital: regulatory adjustments		
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	52 (1) (b), 56 (a), 57
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	56 (b), 58
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10 % threshold and net of eligible short positions) (negative amount)	56 (c), 59, 60, 79
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	56 (d), 59, 79
41	Empty set in the EU	
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)	56 (e)
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	Sum of rows 37 to 42
44	Additional Tier 1 (AT1) capital	Row 36 minus row 43
45	Tier 1 capital (T1 = CET1 + AT1)	Sum of row 29 and row 44
Tier 2 (T2) capital: instruments and provisions		
46	Capital instruments and the related share premium accounts	62, 63
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2	486 (4)
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	87, 88
49	of which: instruments issued by subsidiaries subject to phase out	486 (4)
50	Credit risk adjustments	62 (c) & (d)
51	Tier 2 (T2) capital before regulatory adjustments	
Tier 2 (T2) capital: regulatory adjustments		
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	63 (b) (i), 66 (a), 67
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	66 (b), 68
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10 % threshold and net of eligible short positions) (negative amount)	66 (c), 69, 70, 79



55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		66 (d), 69, 79
56	Empty set in the EU		
57	Total regulatory adjustments to Tier 2 (T2) capital		Sum of rows 52 to 56
58	Tier 2 (T2) capital		Row 51 minus row 57
59	Total capital (TC = T1 + T2)		Sum of row 45 and row 58
60	Total risk weighted assets		
Capital ratios and buffers			
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)		92 (2) (a)
62	Tier 1 (as a percentage of total risk exposure amount)		92 (2) (b)
63	Total capital (as a percentage of total risk exposure amount)		92 (2) (c)
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus systemically important institution buffer expressed as a percentage of risk exposure amount)		CRD 128, 129, 130, 131, 133
65	of which: capital conservation buffer requirement		
66	of which: countercyclical buffer requirement		
67	of which: systemic risk buffer requirement		
67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer		
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)		CRD 128
69	[non relevant in EU regulation]		
70	[non relevant in EU regulation]		
71	[non relevant in EU regulation]		
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (h), 46, 45 56 (c), 59, 60 66 (c), 69, 70
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10 % threshold and net of eligible short positions)		36 (1) (i), 45, 48
74	Empty set in the EU		
75	Deferred tax assets arising from temporary differences (amount below 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 48



Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		62
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		62
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		62
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		62
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	— Current cap on CET1 instruments subject to phase out arrangements		484 (3), 486 (2) & (5)
81	— Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		484 (3), 486 (2) & (5)
82	— Current cap on AT1 instruments subject to phase out arrangements		484 (4), 486 (3) & (5)
83	— Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) & (5)
84	— Current cap on T2 instruments subject to phase out arrangements		484 (5), 486 (4) & (5)
85	— Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) & (5)



Transitional own funds disclosure template

Common Equity Tier 1 capital: instruments and reserves		(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) No 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE-REGU- LATION (EU) No 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) No 575/ 2013
1	Capital instruments and the related share premium accounts		26 (1), 27, 28, 29, EBA list 26 (3)	
	of which: Instrument type 1		EBA list 26 (3)	
	of which: Instrument type 2		EBA list 26 (3)	
	of which: Instrument type 3		EBA list 26 (3)	
2	Retained earnings		26 (1) (c)	
3	Accumulated other comprehensive income (and other reserves, to include unrealised gains and losses under the applicable accounting standards)		26 (1)	
3a	Funds for general banking risk		26 (1) (f)	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1		486 (2)	
	Public sector capital injections grandfathered until 1 January 2018		483 (2)	
5	Minority interests (amount allowed in consolidated CET1)		84, 479, 480	
5a	Independently reviewed interim profits net of any foreseeable charge or dividend		26 (2)	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments			
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)		34, 105	
8	Intangible assets (net of related tax liability) (negative amount)		36 (1) (b), 37, 472 (4)	
9	Empty Set in the EU			
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		36 (1) (c), 38, 472 (5)	



11	Fair value reserves related to gains or losses on cash flow hedges		33 (a)	
12	Negative amounts resulting from the calculation of expected loss amounts		36 (1) (d), 40, 159, 472 (5)	
13	Any increase in equity that results from securitised assets (negative amount)		32 (1)	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		33 (b)	
15	Defined-benefit pension fund assets (negative amount)		36 (1) (e), 41, 472 (7)	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)		36 (1) (f), 42, 472 (8)	
17	Holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		36 (1) (g), 44, 472 (9)	
18	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above the 10% threshold and net of eligible short positions) (negative amount)		36 (1) (h), 43, 45, 46, 49 (2) (3), 79, 472 (10)	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79, 470, 472 (11)	
20	Empty Set in the EU			
20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		36 (1) (k)	
20b	of which: qualifying holdings outside the financial sector (negative amount)		36 (1) (k) (i), 89 to 91	
20c	of which: securitisation positions (negative amount)		36 (1) (k) (ii) 243 (1) (b) 244 (1) (b) 258	
20d	of which: free deliveries (negative amount)		36 (1) (k) (iii), 379 (3)	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in 38 (3) are met) (negative amount)		36 (1) (c), 38, 48 (1) (a), 470, 472 (5)	
22	Amount exceeding the 15% threshold (negative amount)		48 (1)	



23	of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		36 (1) (i), 48 (1) (b), 470, 472 (11)	
24	Empty Set in the EU			
25	of which: deferred tax assets arising from temporary differences		36 (1) (c), 38, 48 (1) (a), 470, 472 (5)	
25a	Losses for the current financial year (negative amount)		36 (1) (a), 472 (3)	
25b	Foreseeable tax charges relating to CET1 items (negative amount)		36 (1) (i)	
26	Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment			
26a	Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468			
	Of which: ... filter for unrealised loss 1		467	
	Of which: ... filter for unrealised loss 2		467	
	Of which: ... filter for unrealised gain 1		468	
	Of which: ... filter for unrealised gain 2		468	
26b	Amount to be deducted from or added to Common Equity Tier 1 capital with regard to additional filters and deductions required pre CRR		481	
	Of which: ...		481	
27	Qualifying AT1 deductions that exceed the AT1 capital of the institution (negative amount)		36 (1) (j)	
28	Total regulatory adjustments to Common equity Tier 1 (CET1)			
29	Common Equity Tier 1 (CET1) capital			
Additional Tier 1 (AT1) capital: Instruments				
30	Capital Instruments and the related share premium accounts		51, 52	
31	of which: classified as equity under applicable accounting standards			
32	of which: classified as liabilities under applicable accounting standards			
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1		486 (3)	
	Public sector capital injections grandfathered until 1 January 2018		483 (3)	



34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		85, 86, 480	
35	of which: instruments issued by subsidiaries subject to phase out		486 (3)	
36	Additional Tier 1 (AT1) capital before regulatory adjustments			
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct and indirect holdings by an institution of own AT1 Instruments (negative amount)		52 (1) (b), 56 (a), 57, 475 (2)	
38	Holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		56 (b), 58, 475 (3)	
39	Direct and indirect holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above the 10% threshold and net of eligible short positions) (negative amount)		56 (c), 59, 60, 79, 475 (4)	
40	Direct and indirect holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above the 10% threshold net of eligible short positions) (negative amount)		56 (d), 59, 79, 475 (4)	
41	Regulatory adjustments applied to additional tier 1 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)			
41a	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013		472, 472(3)(a), 472 (4), 472 (5), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a)	
	Of which items to be detailed line by line, e.g. Material net interim losses, intangibles, shortfall of provisions to expected losses etc			
41b	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Tier 2 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013		477, 477 (3), 477 (4) (a)	
	Of which items to be detailed line by line, e.g. Reciprocal cross holdings in Tier 2 instruments, direct holdings of non-significant investments in the capital of other financial sector entities, etc			



41c	Amount to be deducted from or added to Additional Tier 1 capital with regard to additional filters and deductions required pre- CRR		467, 468, 481	
	Of which: ... possible filter for unrealised losses		467	
	Of which: ... possible filter for unrealised gains		468	
	Of which: ...		481	
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital			
44	Additional Tier 1 (AT1) capital			
45	Tier 1 capital (T1 = CET1 + AT1)			
Tier 2 (T2) capital: instruments and provisions				
46	Capital instruments and the related share premium accounts		62, 63	
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2		486 (4)	
	Public sector capital injections grandfathered until 1 January 2018		483 (4)	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		87, 88, 480	
49	of which: instruments issued by subsidiaries subject to phase out		486 (4)	
50	Credit risk adjustments		62 (c) & (d)	
51	Tier 2 (T2) capital before regulatory adjustments			
Tier 2 (T2) capital: regulatory adjustments				
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)		63 (b) (i), 66 (a), 67, 477 (2)	
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		66 (b), 68, 477 (3)	



54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		66 (c), 69, 70, 79, 477 (4)	
54a	Of which new holdings not subject to transitional arrangements			
54b	Of which holdings existing before 1 January 2013 and subject to transitional arrangements			
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		66 (d), 69, 79, 477 (4)	
56	Regulatory adjustments applied to tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)			
56a	Residual amounts deducted from Tier 2 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013		472, 472(3)(a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a)	
	Of which items to be detailed line by line, e.g. Material net interim losses, intangibles, shortfall of provisions to expected losses etc			
56b	Residual amounts deducted from Tier 2 capital with regard to deduction from Additional Tier 1 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013		475, 475 (2) (a), 475 (3), 475 (4) (a)	
	Of which items to be detailed line by line, e.g. reciprocal cross holdings in at1 instruments, direct holdings of non significant investments in the capital of other financial sector entities, etc			
56c	Amount to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre CRR		467, 468, 481	
	Of which: ... possible filter for unrealised losses		467	
	Of which: ... possible filter for unrealised gains		468	
	Of which: ...		481	
57	Total regulatory adjustments to Tier 2 (T2) capital			



58	Tier 2 (T2) capital			
59	Total capital (TC = T1 + T2)			
59a	Risk weighted assets in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013(i.e. CRR residual amounts)			
	Of which: ... items not deducted from CET1 (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Deferred tax assets that rely on future profitability net of related tax liability, indirect holdings of own CET1, etc)		472, 472 (5), 472 (8) (b), 472 (10) (b), 472 (11) (b)	
	Of which: ... items not deducted from AT1 items (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Reciprocal cross holdings in T2 instruments, direct holdings of non-significant investments in the capital of other financial sector entities, etc.)		475, 475 (2) (b), 475 (2) (c), 475 (4) (b)	
	Items not deducted from T2 items (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Indirect holdings of own T2 instruments, indirect holdings of non-significant investments in the capital of other financial sector entities, indirect holdings of significant investments in the capital of other financial sector entities etc)		477, 477 (2) (b), 477 (2) (c), 477 (4) (b)	
60	Total risk weighted assets			
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of risk exposure amount)		92 (2) (a), 465	
62	Tier 1 (as a percentage of risk exposure amount)		92 (2) (b), 465	
63	Total capital (as a percentage of risk exposure amount)		92 (2) (c)	
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII buffer), expressed as a percentage of risk exposure amount)		CRD 128, 129, 130	
65	of which: capital conservation buffer requirement			
66	of which: countercyclical buffer requirement			
67	of which: systemic risk buffer requirement			



67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer		CRD 131	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)		CRD 128	
69	[non relevant in EU regulation]			
70	[non relevant in EU regulation]			
71	[non relevant in EU regulation]			
Capital ratios and buffers				
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (h), 45, 46, 472 (10) 56 (c), 59, 60, 475 (4) 66 (c), 69, 70, 477 (4)	
73	Direct and indirect holdings by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (i), 45, 48, 470, 472 (11)	
74	Empty Set in the EU			
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 46, 470, 472 (5)	
Applicable caps on the inclusion of provisions in Tier 2				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)		62	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		62	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		62	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		62	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 and 1 Jan 2022)				
80	Current cap on CET1 instruments subject to phase out arrangements		484 (3), 486 (2) & (5)	



81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		484 (3), 486 (2) & (5)	
82	Current cap on AT1 instruments subject to phase out arrangements		484 (4), 486 (3) & (5)	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) & (5)	
84	Current cap on T2 instruments subject to phase out arrangements		484 (5), 486 (4) & (5)	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) & (5)	

12.3. COMMISSION DELEGATED REGULATION (EU) 2015/1555

28 May 2015

Supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards for the disclosure of information in relation to the compliance of institutions with the requirement for a countercyclical capital buffer in accordance with Article 440

Row		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value IRB	Sum of long and short position of trading book	Value of trading book exposure	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
		010	020	030	040	050	060	070	080	090	100	110	120
010	Breakdown by country												
	Cyprus	18.4						0			0		0%
	Ireland	53.3						0			0		0%
	Jersey	11.7						11.7			11.7		0%
	Luxembourg	37.2						1.8			1.8		0%



	Switzerland	640.1						14.6			14.6		0%
	Germany	0.9						0.2			0.2		0%
	Russia	62.7						38.7			38.7		0%
	United States	5.4						1.1			1.1		0%
	Guernsey	206.6						9.2			9.2		0%
	Netherlands	1.3						0			0		0%
	Belgium	27.0						0			0		0%
	TOTAL	1,064.6						77.3			77.3		
020													

12.4. COMMISSION IMPLEMENTING REGULATION (EU) 2016/200

15 February 2016

Laying down implementing technical standards with regard to disclosure of the leverage ratio for institutions, according to Regulation (EU) No 575/2013 of the European Parliament and of the Council

ANNEX I

CRR Leverage Ratio — Disclosure Template

	Reference date	
	Entity name	
	Level of application	
Table LRSum: Summary reconciliation of accounting assets and leverage ratio exposures		
	Amounts in EUR million	Applicable Amount
1	Total assets as per published financial statements	194.6
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-
3	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with Article 429(13) of Regulation (EU) No 575/2013)	-
4	Adjustments for derivative financial instruments	1.4
5	Adjustment for securities financing transactions (SFTs)	-
6	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet	869.0

	exposures)	
EU-6a	(Adjustment for intragroup exposures excluded from the leverage ratio total exposure measure in accordance with Article 429(7) of Regulation (EU) No 575/2013)	-
EU-6b	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with Article 429(14) of Regulation (EU) No 575/2013)	-
7	Other adjustments	(0.4)
8	Leverage ratio total exposure measure	1'064.6
Table LRCom: Leverage ratio common disclosure		
		CRR leverage ratio exposures
On-balance sheet exposures (excluding derivatives and SFTs)		
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	194.7
2	(Asset amounts deducted in determining Tier 1 capital)	(0.5)
3	Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)	194.2
		CRR leverage ratio exposures
Derivative exposures		
4	Replacement cost associated with <i>all</i> derivatives transactions (ie net of eligi ble cash variation margin)	1.0
5	Add-on amounts for PFE associated with <i>all</i> derivatives transactions (mark- to-market method)	0.3
EU-5a	Exposure determined under Original Exposure Method	-
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the	-

	applicable accounting framework	
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-
8	(Exempted CCP leg of client-cleared trade exposures)	-
9	Adjusted effective notional amount of written credit derivatives	-
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-
11	Total derivatives exposures (sum of lines 4 to 10)	1.3
SFT exposures		
12	Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	-
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-
14	Counterparty credit risk exposure for SFT assets	-
EU-14a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429b(4) and 222 of Regulation (EU) No 575/2013	-
15	Agent transaction exposures	-
EU-15a	(Exempted CCP leg of client-cleared SFT exposure)	-
16	Total securities financing transaction exposures (sum of lines 12 to 15a)	-
Other off-balance sheet exposures		
17	Off-balance sheet exposures at gross notional amount	869.0
		CRR leverage ratio exposures
18	(Adjustments for conversion to credit equivalent amounts)	-
19	Other off-balance sheet exposures (sum of lines 17 and 18)	869.0

Exempted exposures in accordance with Article 429(7) and (14) of Regulation (EU) No 575/2013 (on and off balance sheet)		
EU-19a	(Intragroup exposures (solo basis) exempted in accordance with Article 429(7) of Regulation (EU) No 575/2013 (on and off balance sheet))	-
EU-19b	(Exposures exempted in accordance with Article 429 (14) of Regulation (EU) No 575/2013 (on and off balance sheet))	-
Capital and total exposure measure		
20	Tier 1 capital	66.1
21	Leverage ratio total exposure measure (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	1'064.5
Leverage ratio		
22	Leverage ratio	6.2%
Choice on transitional arrangements and amount of derecognised fiduciary items		
EU-23	Choice on transitional arrangements for the definition of the capital measure	Fully phased in
EU-24	Amount of derecognised fiduciary items in accordance with Article 429(11) of Regulation (EU) No 575/2013	-
Table LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)		
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	194.2
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	194.2
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	12.4

EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-
		CRR leverage ratio exposures
EU-7	Institutions	67.0
EU-8	Secured by mortgages of immovable properties	-
EU-9	Retail exposures	-
EU-10	Corporate	114.8
EU-11	Exposures in default	-
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	-