



Basel 3 Pillar 3
NBS decree 16/2014
and Part Eight of Regulation (EU) No. 575/2013
Disclosure as at 30 September 2019

CONTENTS

1. INTRODUCTION	3
2. REQUIREMENTS ACCORDING TO THE NATIONAL BANK OF SLOVAKIA DECREE 16/2014 AS AMENDED.....	4
3. REQUIREMENTS UNDER PART EIGHT OF REGULATION (EU) NO 575/2013 (THE CRR)	17
4. DECLARATION OF THE MANAGER RESPONSIBLE FOR PREPARING THE COMPANY'S FINANCIAL REPORTS	19

1. Introduction

The purpose of the Third pillar of Basel 3, "market discipline", is to complement the minimum capital requirements (Pillar 1) and the supervisory review process (Pillar 2), by encouraging market discipline through the development of a set of disclosure requirements that will allow market participants to assess key pieces of information on the scope of application, regulatory capital, risk exposures, risk assessment processes, and therefore the capital adequacy of the institution. Such disclosures have particular relevance under the new framework introduced by Basel 3, where reliance on internal methodologies gives banks more discretion in assessing capital requirements.

The procedures to be adopted by Slovak banks or banking groups when disclosing information (referred to in brief as Pillar 3) to the public have been laid down by the National Bank of Slovakia Decree 16/2014. This document includes the disclosures set by the Regulation (EU) no. 575/2013 of the European Parliament and of the Council.

All amounts, unless otherwise indicated, are presented in thousands of euro ('€'). Negative values are presented in brackets.

Disclosures that do not contain any information because they do not apply to the VUB Group are not published.

The VUB Group publishes this disclosure (Basel 3 Pillar 3) and subsequent updates on its Internet site at the address www.vub.sk.

2. Requirements according to the National Bank of Slovakia Decree 16/2014 as amended

2.1 Information about VUB Group

Všeobecná úverová banka, a.s. ('the Bank' or 'VUB') provides retail and commercial banking services. The Bank is domiciled in the Slovak Republic with its registered office at Mlynské nivy 1, 829 90 Bratislava 25 and has the identification number (IČO) 313 20 155.

The consolidated financial statements comprise the Bank and its subsidiaries (together referred to as 'the VUB Group' or 'the Group') and the Group's interest in associates and joint ventures (please refer to section 3 for detailed description of companies included in the consolidation).

Organization Chart of the bank¹

Supervisory Board

- 0110 Internal Audit

Management Board

Governance Centre CEO

- 0170 PR and Marketing Communication
- 0190 HR & Organization
- 220 VUB CR Prague Branch
- 03 Corporate and SME
 - 0330 Small and Medium Enterprises
 - 0340 Multinational Clients
 - 0360 Domestic Corporates & Institutional Client
 - 0370 Financial Institutions and Sales
 - 0310 Corporate Banking products
- 04 Retail
 - 0410 Multichannel and CRM
 - 0420 Small Business
 - 0430 Customer Satisfaction
 - 0460 Affluent clients and Private banking
 - 0440 Mass clients
 - 0470 Channel Integration
 - 0491 Quatro

Governance Centre CEO Deputy

- 0150 AML
- 0160 Compliance
- 0180 Legal
- 05 Chief financial officer
 - 0560 Research
 - 0520 Accounting
 - 0580 Treasury and ALM
 - 0540 Procurement
 - 0550 Planning and Control
- 06 Chief operating officer
 - 0611 Real Estate & Corporate Services
 - 0621 Data & Warehousing Applications
 - 0631 Infrastructure & Telecommunications
 - 0641 Demand Management
 - 0650 Back office & Payments
 - 0661 Multi channels & CRM applications
 - 0671 CBS applications
 - 0681 ICT Applications architecture
- 07 Risk Management
 - 0720 Internal Validation and Controls
 - 0730 Enterprise Risk Management
 - 0740 Corporate and Retail Underwriting
 - 0770 Recovery
 - 0790 Policy and Methodology

¹ NBS decree 16/2014, §1, section 1a)

Headcount

Total number of employees:	3,665
thereof Managers:	482
Members of the Management Board:	6

Date of registration in the Companies Register²

1.1.1990 - Registration in the Public Companies Register
1.4.1992 - Registration in the Companies Register

Bank license issued

1.1.1990 – for VUB, Inc.

Commencement date of the execution of licensed banking activities

1.1.1990

² NBS decree 16/2014, §1, section 1b)

List of business activities according to the bank license³

In compliance with § 2 of the Banking Act No 483/2001, the bank, except of acceptance of deposits and provision of loans, may carry on the following banking activities;

1. provision of payment services and settlement;
2. investments in securities on Bank's behalf, provision of the investment services, activities and supporting business
3. trading on the bank's own account:
 - a) with money market financial instruments in EUR and foreign currency, with gold, including exchange operations;
 - b) with capital market financial instruments in EUR and foreign currency;
 - c) in precious metal coins, commemorative bank notes and coins, bank note sheets and circulating coin sets;
4. management of client's receivable on the client's account, including related advisory services;
5. financial leasing;
6. provision of guarantees, opening and validation of Letters of Credit;
7. providing advisory services in commercial matters;
8. issuance of securities, participation in issuance of securities, and provision of related services;
9. financial mediation services;
10. things deposit;
11. lease of safe deposit boxes;
12. provision of banking information;
13. special mortgage business under Section § 67 art. 1 of the Banking Act;
14. depositary duty pursuant to specific regulations;
15. managing banknotes and coins;
16. issuing and administration of electronic money.

In compliance with § 79a section 1 and in connection with § 6 section 1 and 2 of the Act No. 566/2001 Coll. On securities and investment services provision of the investment services, activities and ancillary services to the following extent:

- (i) reception and transmission of client's order regarding one or several financial instruments related to financial instruments:
 - a) transferable securities;
 - b) Money Market instruments;
 - c) fund shares or securities issued by foreign collective investment undertakings;
 - d) options, futures, swaps, forwards and other derivatives related to securities, currencies, interest rates or incomes, or other derivatives instruments, financial indices or financial rates, that may be settled upon delivery or in cash;
 - e) options, swaps and forwards related to commodities, that must be settled in cash or may be settled in cash based on the option of one of the counterparties; it is not applicable if the settlement is due to a default or another event resulted in agreement termination;
 - f) options and swaps related to commodities, that may be settled in cash, if traded in a controlled market or in multilateral trading system;
 - g) options, swaps and forwards related to authorizations to issues, inflation rates, that must be settled in cash or may be settled in cash at the option of one of the parties (it is not applicable if the settlement is due to a default or another event resulted in agreement termination),
- (ii) execution of client's instruction related to financial instrument on his/her account:
 - a) transferable securities;
 - b) Money Market instruments;
 - c) fund shares or securities issued by foreign collective investment undertakings
 - d) options, futures, swaps, forwards and other derivatives related to securities, currencies, interest rates or incomes, or other derivatives instruments, financial indices or financial rates, that may be settled upon delivery or in cash;
 - e) options, swaps and forwards related to commodities, that must be settled in cash or may be settled in cash based on the option of one of the counterparties; it is not applicable if the settlement is due to a default or another event resulted in agreement termination;
 - f) options, and swaps related to commodities, that may be settled in cash, if traded in a controlled market or in multilateral trading system;
 - g) options, swaps and forwards related to authorizations to issues, inflation rates, that must be settled in cash or may be settled in cash at the option of one of the parties (it is not applicable if the settlement is due to a default or another event resulted in agreement termination),
- (iii) trading on Bank's account related to financial instruments:
 - a) transferable securities;
 - b) Money Market instruments;
 - c) fund shares or securities issued by foreign collective investment undertakings;

³ NBS decree 16/2014, §1, section 1c)

- d) options, futures, swaps, forwards and other derivatives related to securities, currencies, interest rates or incomes, or other derivatives instruments, financial indices or financial rates, that may be settled upon delivery or in cash;
 - e) options, swaps and forwards related to commodities, that must be settled in cash or may be settled in cash based on the option of one of the counterparties; it is not applicable if the settlement is due to a default or another event resulted in agreement termination;
 - f) options and swaps related to commodities, that may be settled in cash, if traded in a controlled market or in multilateral trading system;
 - g) options, swaps and forwards related to authorizations to issues, inflation rates, that must be settled in cash or may be settled in cash at the option of one of the parties (it is not applicable if the settlement is due to a default or another event resulted in agreement termination);
- (iv) portfolio management related to financial instruments:
- a) transferable securities;
 - b) Money Market instruments;
 - c) fund shares or securities issued by foreign collective investment undertakings;
 - d) options, futures, swaps, forwards and other derivatives related to securities, currencies, interest rates or incomes, or other derivative instruments, financial indices or financial measures that may be settled upon delivery or in cash;
- (v) investment Counselling related to financial instruments:
- a) transferable securities;
 - b) Money Market instruments;
 - c) fund shares or securities issued by foreign collective investment undertakings;
- (vi) underwriting and placing of financial instruments based on firm commitment related to financial instruments:
- a) transferable securities,
 - b) fund shares or securities issued by foreign collective investment undertakings,
- (vii) placing of financial instruments without firm commitment related to financial instruments:
- a) transferable securities,
 - b) Money Market instruments,
 - c) fund shares or securities issued by foreign collective investment undertakings,
- (viii) safekeeping and management of financial instruments procured on client's account, including custody management, and related services, primarily management of funds and financial collaterals related to financial instruments:
- a) transferable securities,
 - b) Money Market instruments,
 - c) fund shares or securities issued by foreign collective investment undertakings,
- (ix) granting the borrowings and loans to investor and arranging performance of deal involving one or several financial instruments, if the Lender or the Creditor is engaged in the deal;
- (x) counselling related to capital structures and business strategy and providing advisory and services associated with company's merger, amalgamation, change, split or purchase;
- (xi) executing deals with Foreign Currency, if related to investment services;
- (xii) performing investment survey and financial analysis or other form of recommendation related to deals with financial instruments;
- (xiii) services associated with financial instruments' underwriting;
- (xiv) reception and transmission of client orders in relation to one or more financial instruments, execution of orders on behalf of clients, and dealing on own account, related to the underlying of the derivatives – forwards relating to emission allowances that must be settled in cash or may be settled at the option of one of the parties (otherwise than by reason of insolvency or other termination event) where these are connected to the provision of investment or ancillary services concerning abovementioned derivatives.

Banking Supervision Decree No-169/2001 dated 9.2.2001

- generation and distribution of heat, and distribution of electricity to the extent of the VÚB application

Banking Supervision Decree No-192/2000 dated 11.2.2000

- activities related to lease and management of real estate and non-residential premises to the extent of the VÚB application

Banking Supervision Decree No-2057/2002 dated 3.1.2003

- printing and enveloping of invoices, bank account statements, and distribution of letters to the bank's subsidiaries and clients through Slovak Post Office;
- procurement of services related to projects, information technologies, acquisition of computer equipment, applications, data processing, and services related to IT security on behalf of the bank's subsidiaries;
- arrangements in respect of certification of electronic signatures and issuance of PKI keys as an integral part of electronic banking services ensuring secure and incontestable data interchange between the bank and its client;
- bookkeeping on behalf of the bank's subsidiaries and subsidiaries thereof;
- provision of administrative support for the sale of products and provision of expert support and management of selected intermediaries concurrently monitoring and evaluating their obligations within the scope of the authorized banking activity – financial intermediation (Article 2 (2) (h) of the Act on Banks);
- provision of advisory services for activities in the field of administrative support, risk management, and treasury within the scope of the authorized banking activity - provision of business advisory services (Article 2 (2) (h) of the Act on Banks)

Banking Supervision Decree No-UBD-1174/2003 dated 5.8.2003

- preparation of financial and administrative agenda as well as personnel and salary related agenda for the subsidiaries

Banking Supervision Decree No- OPK-11106-2/2009 dated 19.8.2009

- mediation of entering into a license agreement on use of computer product VUB CryptoPlus by and between MONET+, a. s. and clients of VUB, a.s.

Banking Supervision Decree No- OPK-7365-2/2009 dated 19.6.2009

- keeping books of all mutual funds of the subsidiary VÚB Asset Management, správ. spol., a.s.

Banking Supervision Decree No- UDK-057/2006/PAGP dated 21.8.2006

- intermediation of the insurance and secure as an independent financial agent and tied financial agent.

Banking Supervision Decree No ODT-5789/2014-3 dated 19.8.2014, which amends the Decree No. UDK-057/2006/PAGP by extending it for providing of loans and providing of consumer loans.

List of licensed but not conducted business activities⁴

VUB Bank does not provide portfolio management services.

List of business activities conduct of which has been restricted, suspended or cancelled by the relevant authority⁵

Non-performed activities have not been kept in Bank in the 3rd quarter 2019.

Quotation of the statement section of the lawful decision imposing a corrective measure during the calendar quarter⁶

Non-performed activities have not been kept in Bank in the 3rd quarter 2019.

Quotation of the statement section of the lawful decision imposing a penalty during the calendar quarter⁷

Non-performed activities have not been kept in Bank in the 3rd quarter 2019.

The regularly updated individual and consolidated financial information about the bank⁸ can be found on the following web page: <https://www.vub.sk/en/financial-indicators/information-about-bank-activities/>

⁴ NBS decree 16/2014, §1, section 1d)

⁵ NBS decree 16/2014, §1, section 1e)

⁶ NBS decree 16/2014, §1, section 1f)

⁷ NBS decree 16/2014, §1, section 1g)

⁸ NBS decree 16/2014 §1, section 2 a-b)

Aggregate amount of exposures for VUB Bank as at 30 September 2019 ⁹

	Gross carrying amount in ths. EUR			
	Assets without significant increase in credit risk since initial recognition (Stage 1)	Assets with significant increase in credit risk since initial recognition but not credit- impaired (Stage 2)	Credit- impaired assets (Stage 3)	Defaulted exposures
Central banks	1,059,550	-	-	-
Financial assets at AC:				
Credit institutions	265,681	1,696	-	-
Sovereigns	115,561	19,169	1	1
Corporate	4,930,564	527,997	76,987	50,076
Retail	7,950,690	591,812	326,792	274,038
	<u>13,262,496</u>	<u>1,140,674</u>	<u>403,780</u>	<u>324,115</u>
Financial assets at FVOCI - debt securities	1,052,909	-	-	-
Financial commitments and contingencies	3,554,382	171,813	15,752	2,488

The table above represents exposures of VUB Bank only.

⁹ NBS decree 16/2014 §1, section 2c-f)

Information on ten major bank shareholders who possess at least a 5% share in the registered capital of a bank, and on the amount of their shares in the registered capital of a bank and in the voting rights in a bank¹⁰

a) natural person: none

b) natural person – entrepreneur: none

c) legal person:

1. name (trade name)	Intesa Sanpaolo Holding International S. A.
2. legal form and registered office	a joint – stock company, Luxembourg
3. identification and matriculation number	0001000779; B 44318
4. principal business activity	acquisition of capital participations
5. share in the bank's registered capital	97.03%
6. share in the bank's voting rights	97.03%

d) municipality or higher territorial unit: none

e) National Property Fund of the Slovak Republic: does not hold minimum of 5% share

f) state authority: none

Information on other shareholders not given on previous pages and on the amount of their shares in the registered capital of a bank¹¹

a) number of bank shareholders	28,310
b) total share in the bank's registered capital	2.97%
c) share in the voting rights in the bank	2.97%

¹⁰ NBS decree 16/2014 §1, section 5a-b)

¹¹ NBS decree 16/2014 §1, section 6a-c)

Information about Covered Bonds and Mortgage Bonds¹²

Part A

Total overview of issued bonds and their coverage

No.r.	Characteristics	CD and re-registered MB							MB				
		Amount	Accrued Interest / relative value	Amount per Currency					Amount	Accrued Interest	Amount per Currency		
				EUR	USD	GBP	CZK	Other			USD	CZK	Other
a	b	1	2	3	4	5	6	7	8	9	11	12	13
1	Nominal amount of issued bonds (in ths. EUR)	3,051,144	13,659	3,051,144	0	0	0	0	0	0	0	0	0
2	<i>out of which: on own account</i>	-	0	0	0	0	0	0					
3	Number of issues	28		28	0	0	0	0	0		0	0	0
4	Weighted average maturity of outstanding amount of CB and MB (in years)	5.71		5.71	0	0	0	0	0		0	0	0
5	Weighted average interest rate of CB and MB	1.00%		1.00%	0.00%	0.00%	0.00%	0.00%	0		0	0	0
6	Anticipated liabilities (in ths. EUR)	25		25	0	0	0	0					
7	Cover pool (in ths. EUR)	3,380,925	1,844	3,380,925	0	0	0	0	0	0	0	0	0
8	Current coverage ratio		110.37						0				
9	Legal coverage	153,241	5.00%										
10	Higher coverage	0	0										
11	Current rating of issued CB and MB	Aa2							0				

¹² NBS decree 16/2014 §1, section 2h)

Part B

Nr.r.	Asset structure of the cover pool	Total Amount (in ths. EUR)	Share of the Cover Pool	Amount per Currency					Total Amount	Share of the Cover Pool	Amount per Currency		
				EUR	USD	GBP	CZK	Other			USD	CZK	Other
a	b	1	2	3	4	5	6	7	8	9	11	12	13
12	Base assets / Base coverage	3,371,036	99.71%	3,371,036	0	0	0	0	0	0	0	0	0
13	Substitute assets / Substitute coverage	0	0.00	0	0	0	0	0	0	0	0	0	0
14	Hedging derivatives	0	0.00	0	0	0	0	0					
15	Liquid assets	9,889	0.29%	2,236	0	0	7,653	0					

Part C
Residual maturity structure of issued bonds and covering assets

Nr.r.	Time horizon	CB and re-registered MB			MB		
		Total Amount (in ths. EUR)	Base Asset Amount (in ths. EUR)	Substitute Asset Amount (in ths. EUR)	Total Amount	Base Coverage (asset value)	Substitute Coverage (asset value)
a	b	1	2	3	4	5	6
26	from 0 - to 1 year including	234,139	2,305	0	0	0	0
27	from 1 - to 2 years including	49,298	6,995	0	0	0	0
28	from 2 - to 5 years including	1,508,000	57,484	0	0	0	0
29	from 5 - to 10 years including	1,041,597	250,894	0	0	0	0
30	from 10 - to 15 years including	198,194	386,334	0	0	0	0
31	from 15 - to 20 years including	19,916	669,954	0	0	0	0
32	from 20 - to 25 years including	0	823,131	0	0	0	0
33	from 25 - to 30 years including	0	1,173,939	0	0	0	0
34	Weighted average maturity in years	5.71	20.84	0	0	0	0

Part D
Regional breakdown of assets by place of immovable collateral

Nr.r.	Place of immovable collateral	CB and re-registered MB			MB		
		Immovable Collateral Value (in ths. EUR)	Base Assets Value (in ths. EUR)	Weighted Average Interest Rate	Collateral Value	Base Assets Value	Weighted Average Interest Rate
a	b	1	2	3	4	5	6
16	Bratislava - city	1,527,403	754,237		0	0	
17	Banská Bystrica Region	459,268	226,036		0	0	
18	Bratislava Region (without Bratislava-city)	778,880	378,376		0	0	
19	Košice Region	620,008	314,042		0	0	
20	Nitra Region	708,870	367,205		0	0	
21	Prešov Region	518,675	248,306		0	0	
22	Trenčín Region	635,654	309,640		0	0	
23	Trnava Region	842,344	416,967		0	0	
24	Žilina Region	745,887	356,227		0	0	
25	SR - total			1.53			0

Legal entity controlling VÚB, a.s.¹³

Trade name	% share	Registered office	Company ID No.
Intesa Sanpaolo Holding International S.A.	97.03	35 Boulevard du Prince Henri, L-1724, Luxembourg, Luxembourg	B 44318

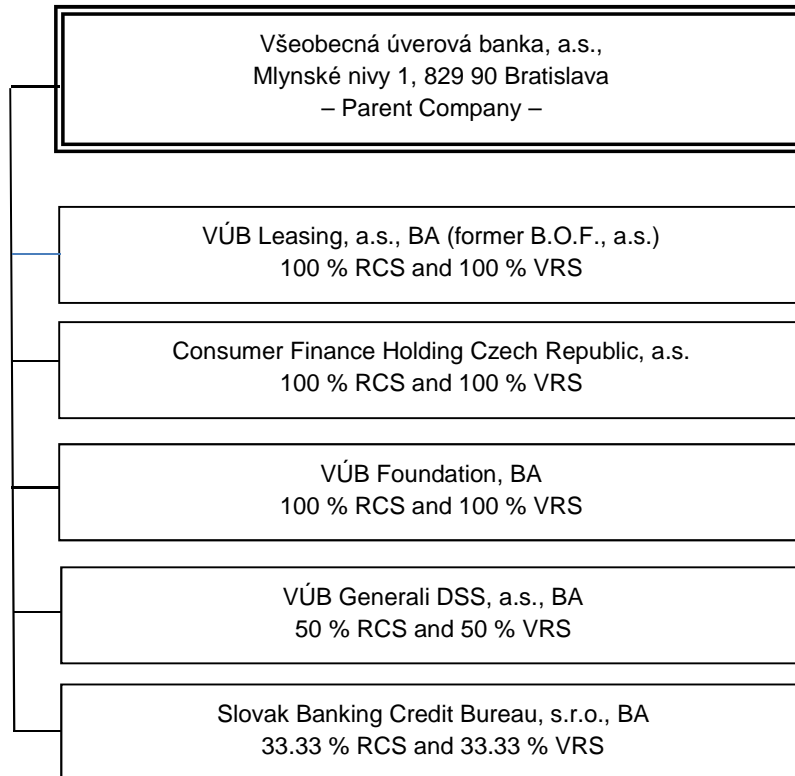
Legal entities controlled by the shareholder controlling VÚB, a.s.
 (The Group of Intesa Sanpaolo Holding International S.A. Luxembourg)

Trade name	% share	Registered office	Company ID No.
Intesa Sanpaolo Bank Luxembourg	100.00	19-21 Boulevard du Prince Henri, L-1724 Luxembourg, (Luxembourg)	B 13859
Banca Intesa ad Beograd	100.00	Milentija Popovica 7b, 11070 Beograd, Serbia and Montenegro	7759231
Privredna Banka Zagreb d.d.	97.47	Rackoga 6, HR-10000 Zagreb, Croatia	MBS 080002817
Banca Intesa (Russia)	53.02	Bld, 2, Petroverigski per, Moscow, 101000 Russian Federation	7708022300
Intesa Sanpaolo Servitia S.A.	100.00	12, Avenue de la Liberté, L-1930 Luxembourg, Luxembourg	B 14241
Exelia S.r.l	100.00	Regione Brasov STR. Ionescu Crum N°1, Corp C2, Tower 2, Et.1.,Brasov,Romania	J08/821/2009
Intesa Sanpaolo Immobilière S.A	100.00	9, rue Goethe, L-1637 Luxembourg Luxembourg	B 55753
Intesa Sanpaolo Real Estate S.A	100.00	8, Avenue de la Liberté, L-1930 Luxembourg Luxembourg	B 62762
Intesa Sanpaolo House Immo S.A	100.00	12, Avenue de la Liberté, L-1930 Luxembourg Luxembourg	B 154021
Intesa Sanpaolo Harbourmaster III S.A.	100.00	35 Boulevard du Prince Henri, L-1724, Luxembourg, Luxembourg	B210947
IMI Finance Luxembourg S.A	100.00	26, Boulevard Royal, L-2449 Luxembourg Luxembourg	B66762

Legal entity controlling Intesa Holding Sanpaolo International S.A. Luxembourg

Trade name	% share	Registered office	Company ID No.
Intesa Sanpaolo S.p.A.	100.00	Piazza San Carlo 156, 10121 Torino, Italy	799960158

¹³ NBS decree 16/2014 §1, section 7

Chart of consolidated VUB Group

RCS = Registered Capital Stake
VRS = Voting Right Share

Share of VUB Bank on the equity and voting rights of the individual members of the consolidated group headed by VUB Bank

Business Name	Registered Office	Registered Capital Stake of VUB	Voting Rights Share of VUB	Core Business
VÚB Leasing, a.s. IČO: 31 318 045	Mlynské nivy 1, Bratislava	100%	100%	Financial and operating leasing
Consumer Finance Holding ČR, a.s.* IČO: 04616073	Pobřežní 620/3, Praha	100%	100%	Non-banking Credit Provision
Nadácia VÚB IČO: 30 856 043	Mlynské nivy 1, Bratislava	100%	100%	Public Beneficial Activity
VÚB Generali DSS, a.s. IČO: 35 903 058	Mlynské nivy 1, Bratislava	50%	50%	Pension fund management
Slovak Banking Credit Bureau, s.r.o. IČO: 35 869 810	Mlynské nivy 14, Bratislava	33.33%	33.33%	Automated data processing

VÚB Leasing, a. s., Nadácia VÚB, VÚB Generali DSS, a.s. and Slovak Banking Credit Bureau, s. r. o. are incorporated in the Slovak Republic. Consumer Finance Holding ČR, a. s. is incorporated in the Czech Republic.

* On 1 October 2019 become effective the cross-border merger of Consumer Finance Holding Česká republika, a. s. registered in Czech Republic as the merging company into the Bank as the successor company. The merging entity shall be wound up without liquidation.

3. Requirements under Part Eight of Regulation (EU) No 575/2013 (the CRR)

Leverage Ratio disclosure according Commission Implementing Regulation (EU) No 2016/200 of 15 February 2016 and Part Eight of Regulation (EU) No 575/2013 (the CRR)

Under the Basel 3 prudential regulations, the Leverage ratio entered definitively into effect on 1 January 2015. The Leverage ratio measures the degree to which Tier 1 Capital covers the bank's total exposure. The ratio is calculated by considering off-balance sheet exposures and assets. The objective of the indicator is to contain the degree of indebtedness on banks' accounts by establishing a minimum level of coverage of exposures with equity. The ratio, which is monitored by the authorities, is expressed in percent form and is subject to a regulatory minimum threshold of 3% (the Basel Committee's reference value).

The Leverage Ratio is calculated quarterly. The indicator is monitored at both the individual and consolidated level. The Leverage ratio is calculated as the ratio of Tier 1 Capital to total exposure. Focusing on the denominator of the ratio, total exposure includes on-balance sheet exposures, net of any components deducted from Tier 1 Capital, and off-balance sheet exposures. The disclosure of the Leverage ratio is presented in accordance with the regulatory principles of the CRR and set out according to the provisions of (EU) Implementing Regulation 2016/200. The ratio is expressed in percent form and is subject to the regulatory minimum threshold of 3% (the Basel Committee reference value).

Own funds disclosure template according Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013 and Part Eight of Regulation (EU) No 575/2013 (the CRR)

Own funds, risk-weighted assets and the capital ratios are calculated according to the harmonised rules and regulations for banks and investment companies contained in Directive 2013/36/EU ('CRD IV') and in CRR regulation of 26 June 2013, which transpose the banking supervision standards defined by the Basel Committee (the Basel 3 Framework) to European Union laws.

This regulatory framework requires that Own Funds (or regulatory capital) are made up of the following tiers of capital:

- Tier 1 capital, in turn composed of:
 - Common Equity Tier 1 Capital (CET1);
 - Additional Tier 1 Capital (AT1);
- Tier 2 Capital (T2)

Tier 1 capital is mainly composed of equity instruments:

share capital, share premium, retained earnings without net profit for the period, other reserves, accumulated other comprehensive income, fair value gains and losses arising from the bank's own credit risk related to derivative liabilities, other transitional adjustments to CET1 capital, CET1 capital elements or deductions — other, negative items are goodwill and intangible assets. In order to be eligible for Common Equity, the equity instruments issued must guarantee absorption of losses on going concern and only where they are available to the institution for unrestricted and immediate use to cover risks or losses as soon as these occur.

Tier 2 capital is mainly composed of: IRB excess of provisions over expected losses eligible, subordinated debt, other transitional adjustments to T2 Capital.

Liquidity coverage ratio (LCR) disclosure according to NBS decree 16/2014 as amended, §1 section 2g) are included in Attachment no.1.

Other Disclosure requirements according to Part Eight of Regulation (EU) No 575/2013 (the CRR) - Quantitative disclosures are included in Attachment no. 1.

4. Declaration of the Manager responsible for preparing the Company's financial reports

The Manager responsible for preparing the Company's financial reports, Antonio Bergalio, declares, pursuant to par. 2 of art. 154-bis of the Italian "Testo Unico della Finanza" (Consolidated Law on Finance), that the accounting information contained in this document corresponds to the corporate records, books and accounts.

11 November 2019



Antonio Bergalio
Manager responsible for preparing the
Company's financial reports