

---

## Pillar 3 Disclosure Report as at 31.12.2014

J.P. Morgan Bank (Ireland) plc

30th September 2015

## Contents

	List of Tables .....	4
1. Introduction.....		5
	Background .....	5
	Aim of the disclosure report .....	5
	Frequency and means of disclosure (Art. 433 and 434).....	6
	Firmwide disclosure.....	6
2. Risk management and objectives (Art. 435) .....		7
	Risk management framework.....	7
	Risk governance and oversight .....	8
	Links to regional and firm-wide risk governance.....	8
	Identification and measurement of key risks.....	9
	Credit Risk .....	9
	Market Risk .....	12
	Operational risk .....	13
	Liquidity Risk.....	15
	Interest rate risk in the banking book .....	16
	Fiduciary risk.....	17
	Business Risk .....	17
	Risk Appetite .....	18
	Board Declaration - Adequacy of Risk Management Arrangements .....	19
	Members of the Board of Directors .....	19
	Diversity & Inclusion .....	21
	Guiding Principles .....	21
	Scope and Process .....	22
	Metrics.....	22
	Target for representation of Women on EMEA Boards .....	22
3. Own funds (Art. 437) .....		23
4. Capital requirements (Art. 438).....		26
	Internal Capital Adequacy Assessment Process.....	26
	Minimum capital requirements.....	26
	Pillar 1 .....	26
5. Exposure to counterparty credit risk (Art. 439) .....		28
	Internal capital and credit limits for counterparty credit exposures .....	28
	Policies for securing collateral and establishing credit reserves, and with respect to wrong-way risk exposures.....	28
	Counterparty Credit Risk analysis .....	29
6. Credit risk adjustments (Art. 442) .....		30
	JPMBI did not have any credit risk adjustments for the year end 31st December.....	30
	Credit risk adjustments for derivatives .....	30

	Credit Risk Exposures before credit risk mitigation .....	30
	Geographical location of exposures .....	30
	Industry analysis of credit exposures .....	31
	Residual maturity analysis of credit exposures .....	32
	Past due and impaired loans .....	32
7.	Unencumbered assets (Art. 443) .....	32
8.	Use of External Credit Assessment Institutions (Art. 444) .....	33
	ECAIs and exposure classes .....	33
	CQS and Risk Weight Mapping for Rated and Unrated Counterparties .....	33
	Exposures at default pre-, and post-, credit risk mitigation by credit quality step .....	35
9.	Exposure to market risk (Art. 445) .....	36
10.	Operational Risk (Art. 446) .....	36
	Pillar 1 .....	36
	Pillar 2 .....	36
11.	Exposure to interest rate risk on positions not included in the trading book (Art. 448) .....	37
	Firmwide approach to Interest Rate Risk in the Banking Book .....	37
	IRRBB for J.P. Morgan Bank (Ireland) plc .....	37
12.	Non Trading Book Equity Investments .....	38
13.	Exposure to Securitisation Positions .....	38
14.	Remuneration policy (Art. 450) .....	38
	Managing leverage risk .....	38
16.	Disclosures not applicable to JPMBI for the period ending 31 December 2014 .....	40

## List of Tables

1. CRD IV regulatory capital for JPMBI
2. Summary of main features of capital resources
3. Minimal Capital Requirements for Credit Risk (Banking Book) under the Standardised Approach
4. Minimum capital requirement for market risk, settlement risk , large exposures and operational risk
5. Counterparty credit exposure analysed by financial contract type for JPMBI
6. Credit Risk Exposures before Credit Risk Mitigation (CRM) for JPMBI
7. Geographic analysis of credit exposure for JPMBI
8. Industry analysis of credit exposure for JPMBI
9. Residual maturity analysis of credit exposures for JPMBI
10. Standardised approach: mapping of ECAIs' credit assessments to credit quality steps. Long term mapping
11. Standardised approach: mapping of ECAIs' credit assessments to credit quality steps. Short term mapping
12. Credit quality step analysis of Pre CRM exposure and capital deductions under the Standardised Approach for JPMBI
13. Credit quality step analysis of Post -CRM exposure and capital deductions under the Standardised Approach for JPMBI
14. Minimum capital requirement for market risk
15. Risk weighted assets for operational risk in 2014
16. Summary reconciliation of accounting assets and leverage ratio exposures

# Pillar 3 Disclosure Report 2014

## 1. Introduction

### Background

The Basel Committee on Banking Supervision has published its set of rules on 16. December 2010, referred to as Basel III.

Basel III includes the Basel II agreement as of 2004, which consists of 3 supplemental Pillars:

- Pillar 1 – Minimum Capital Requirements
- Pillar 2 – Internal Capital Adequacy Assessment Process and
- Pillar 3 – Public Disclosure

Pillar 3 Public Disclosure provides market participants with information on applied rules, own funds, risk, risk analysis and thus the capital adequacy.

The transposition of the Basel III framework into European law was done in two parts: publication of the Capital Requirements Directive IV (CRD IV/Directive 2013/36/EU) and the Capital Requirements Regulation (CRR/Regulation [EU] Nr. 575/2013). It was published in the Official Journal of the European Union on 27. June 2013. Part 8 of CRR includes additional provisions on regulatory disclosure for credit institutions.

Both the Directive and the Regulation are applicable since 1 January 2014.

### Aim of the disclosure report

This report shall provide an overview of the risk profile and risk management of J.P. Morgan Bank (Ireland) plc and its subsidiaries, J.P. Morgan Administration Services (Ireland) Limited and J.P. Morgan Ireland (Nominees) Limited, hereafter referred to as JPMBI.

This disclosure fulfils the requirements as set out in Part Eight of the CRR, and in the supplementary Implementing Technical Standards and guidelines issued by the European Banking Authority (EBA).<sup>1</sup>

In accordance with Article 432 CRR and EBA guidelines in EBA/GL/2014/14<sup>2</sup> on material, proprietary or confidential information, the representations in this report are based on materiality as defined in EBA/GL/2014/14.

---

<sup>1</sup> EBA Final draft Implementing Technical Standards on the disclosure of Own Funds 26<sup>th</sup> July 2013

EBA Final draft Implementing Technical standards amending ITS on the disclosure of Leverage Ratio 15th June 2015

<sup>2</sup> EBA Guidelines on materiality, proprietary and confidentiality and on disclosure frequency 23 December 2014

## Frequency and means of disclosure (Art. 433 and 434)

JPMBI publishes an annual report in accordance with Article 433 CRR.

Disclosure frequency will be assessed under EBA/GL/2014/14. The disclosure report is made available according to Article 434 CRR on the website of JPMorgan Chase & Co. at

<http://investor.shareholder.com/jpmorganchase/basel.cfm>

## Scope of application (Art. 436)

These disclosures are made at the consolidated level of JPMBI.

The main activities of the entities within JPMBI consist of the following:

- Corporate & Investment Bank –Global Investment Banking and Treasury Services
- Investor Services –Trustee and Custody & Fund Services and Financing

As required under Article 436 CRR, it is confirmed that outside of regulatory requirements to hold capital, there are no current or foreseen material practical or legal impediments to the prompt transfer of funds or repayment of liabilities among the parent undertakings or, where applicable, their subsidiaries.

## Firmwide disclosure

The ultimate parent of the entities in scope of the disclosure is J.P. Morgan Chase & Co, which is incorporated in the United States of America.

Firmwide disclosure is made under Basel III requirement available at the below link. Reference is made to this throughout the document:

[http://files.shareholder.com/downloads/ONE/490910175x0x811627/9875F990-DE2F-420E-84C1-54EDDBE9C493/JPMorgan\\_Chase\\_Co\\_4Q14\\_Basel\\_Pillar\\_3\\_Report.pdf](http://files.shareholder.com/downloads/ONE/490910175x0x811627/9875F990-DE2F-420E-84C1-54EDDBE9C493/JPMorgan_Chase_Co_4Q14_Basel_Pillar_3_Report.pdf)

In addition, the U.S. Securities and Exchange Commission filings made at the firmwide level, 10K and 10Q, provide additional information at the following link:

<http://investor.shareholder.com/jpmorganchase/sec.cfm>

This document refers to J.P. Morgan, 'J.P. Morgan Group' or 'Firm' when referring to frameworks, methodologies, systems and controls that are adopted throughout JPMorgan Chase & Co. (JPMC) and its subsidiaries. Entity names are used to refer to documents, financial resources and other tangible concepts relevant only to that entity.

'JPMBI' is used to refer interchangeably to J.P. Morgan Bank (Ireland) plc as stand-alone entity as well as the consolidated group.

## 2. Risk management and objectives (Art. 435)

### Risk management framework

Risk is an inherent part of J.P. Morgan's business activities. When the Firm extends a consumer or wholesale loan, advises customers on their investment decisions, makes markets in securities, or conducts any number of other services or activities, the Firm takes on some degree of risk. The Firm's overall objective in managing risk is to protect the safety and soundness of the Firm, avoid excessive risk taking, and manage and balance risk in a manner that serves the interest of our clients, customers and shareholders. The Firm's approach to risk management covers a broad spectrum of risk areas.

The Firm believes that effective risk management requires:

- Acceptance of responsibility, including identification and escalation of risk issues, by all individuals within the Firm;
- Ownership of risk management within each line of business (LOB) and corporate functions; and
- Firmwide structures for risk governance.

Firmwide Risk Management is overseen and managed on an enterprise-wide basis. The Firm's Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Risk Officer (CRO) and Chief Operating Officer (COO) develop and set the risk management framework and governance structure for the Firm, which is intended to provide comprehensive controls and ongoing management of the major risks inherent in the Firm's business activities. The Firm's risk management framework is intended to create a culture of transparency, awareness and personal responsibility through reporting, collaboration, discussion, escalation and sharing of information. The CEO, CFO, CRO and COO are ultimately responsible and accountable to the Firm's Board of Directors. The Firm's risk culture strives for continual improvement through ongoing employee training and development, as well as talent retention. The Firm also approaches its incentive compensation arrangements through an integrated risk, compensation and financial management framework to encourage a culture of risk awareness and personal accountability.

The Firm has identified various risks that are inherent in its business activities. These include credit risk, market risk, operational risk, liquidity risk, fiduciary risk, interest rate risk in the banking book, business risk and leverage risk, which are set out in further detail below.

The Firm's control environment can be thought of in terms of the businesses, the control functions and Internal Audit.

The lines of business are responsible for developing and maintaining effective internal controls for their respective business lines. They are accountable for identifying and addressing the risks presented by their respective businesses and for operating within a sound control environment. Oversight & Control teams are embedded within businesses to maintain a strong and consistent control environment across the organization.

**Control functions.** In addition to Oversight & Control, the Firm's control functions include Risk, Finance, Compliance and Legal. They each have their own set of responsibilities but work together to provide oversight of the businesses and set firmwide control policies.

**Internal Audit.** The Internal Audit function operates independently from other parts of the Firm, providing testing and evaluation of processes and controls across the entire enterprise. The Internal Audit team assesses the effectiveness of governance, risk management and internal controls; evaluates compliance with laws and regulations; and identifies opportunities for improvement. Through this structure, we seek to subject business decisions and actions to rigorous consideration, testing and review for compliance with relevant laws and regulations.

## Risk governance and oversight

The LOBs are responsible for managing the risks inherent in their respective business activities.

The Risk organization operates independently from the revenue-generating businesses, providing a credible challenge to them. The CRO is the head of the Risk organization and is responsible for the overall direction of Risk oversight. The CRO is supported by individuals and organizations that align to lines of business and corporate functions, as well as others that align to specific risk types.

The Firm's Risk Management organization and other firmwide functions with risk-related responsibilities (i.e., Oversight and Control Group, Legal and Compliance) provide independent oversight of the monitoring, evaluation and escalation of risk.

Within the Europe, Middle East and Africa region, a governance framework has been developed in alignment with the firmwide policies and procedures and provides an additional layer of control on a regional and legal entity basis.

Each regulated legal entity in Ireland has its own Board of Directors which has direct accountability and legal responsibility to ensure the entity acts within the framework and overall strategy and control of the Firm.

The Board of JPMBI has delegated oversight of risk matters to JPMBI Risk Committee, which provides oversight and challenge of risks for business conducted by JPMBI and is chaired by a non-Executive Director. The Risk Committee is accountable to the Board and to the ERC. The Risk Committee met 4 times during 2014.

## Links to regional and firm-wide risk governance

JPMBI is closely aligned to the regional and firm-wide risk governance structure. The Legal Entity Risk Committee (LERC) provides governance and oversight for legal entity risk management, Legal Entity Risk Managers (LERMs) and Chief Risk Officers (CROs) at a regional level.

The LERC is accountable to the EMEA Risk Committee (ERC) and where required, directly to the relevant Boards or Directors' Risk Policy Committees or equivalent of the relevant legal entity. The ERC is responsible for the oversight of all risks within the region, and reports up to the Firm-wide Risk Committee (FRC) which is the highest management level Risk Committee in the Firm.

The LERC provides governance and oversight from the firm's independent central risk control function of all risks with the exception of risks in relation to the investment management business. In addition, the LERC provides oversight of any risk issues escalated in relation to risk appetite and capital adequacy, where appropriate or required.



The EMEA governance framework connects legal entity, LOB and global governance structures. These are the EMEA Management Committee (EMC), the EMEA Risk Committee (ERC) and the EMEA Operating Committee (EOC):

- The EMEA Management Committee (EMC) provides holistic regional oversight for any business conducted in EMEA or booked into EMEA entities. The EMC ensures that any significant decisions taken within the EMEA region are aligned to the Firm's strategy and that the regional strategies are appropriate for the EMEA entities, considers the material risks and issues that are escalated to the EMC by regional forums, and provides the necessary oversight and challenge for any proposed mitigation/remediation activities. The EMC is accountable to the boards of the individual legal entities.
- The EMEA Risk Committee (ERC) provides oversight and challenge of risks for any business conducted in EMEA or booked into EMEA entities, and is chaired by the EMEA CRO. The ERC is accountable to the EMC and the Firmwide Risk Committee (FRC), where the EMEA CRO is also a member, and the boards of the individual legal entities. The ERC met 35 times during 2014.
- The EMEA Operating Committee (EOC) provides oversight and management of the operating environment to ensure appropriate management of operational risk and the maintenance of a sound internal control environment across all LOBS in the EMEA region. The EOC is accountable to the EMC and the boards of the individual legal entities.

The Committees above may delegate responsibility for management and oversight of risks to other committees or forums.

Additionally, the EMEA Audit and Compliance Committee reports into the global Audit Committee and the Board and oversees the integrity of financial statements, monitors and reviews internal financial controls and the effectiveness of the internal audit function.

## Identification and measurement of key risks

JPMBI completes the Internal Capital Adequacy Assessment Process (ICAAP) periodically, which forms part of management and decision-making processes such as the Firm's risk appetite, strategy, capital and risk management frameworks, and stress testing. The ICAAP is used to assess the key risks to which the Firm is exposed; how these risks are measured, managed, monitored and mitigated; and how much capital the firm should hold to reflect these risks now, in the future and under stressed conditions. Further information is provided on the ICAAP process under Art. 438.

## Credit Risk

Credit risk is the risk of loss arising from the default of a customer, client or counterparty. The Firm is exposed to credit risk through its underwriting, lending and trading activities with and for clients and counterparties, as well as through its operating services activities, such as cash management, settlement and clearing activities. A portion of the loans originated or acquired by the Firm's wholesale businesses are generally retained on the balance sheet; the Firm's syndicated loan business distributes a significant percentage of originations into the market and is an important component of portfolio management.

Credit Risk is an independent risk management function that identifies and monitors credit risks throughout the Firm and defines credit risk policies and procedures. The Credit Risk function reports to the Firm's Chief Risk Officer. Credit Risk is responsible for the following functions:

- Establishing a comprehensive credit risk policy framework
- Monitoring and managing credit exposure across all portfolio segments, including transaction and line approval
- Assigning credit authorities in connection with the approval of all credit exposure
- Intensive management of criticized exposures and delinquent loans
- Determining the allowance for credit losses and ensuring appropriate credit risk-based capital management

### **Risk identification and measurement**

The Credit Risk function identifies, measures, limits, manages and monitors credit risk across our businesses. To measure credit risk, the Firm employs several methodologies for estimating the likelihood of obligor or counterparty default. Methodologies for measuring credit risk vary depending on several factors, including type of asset, volatility in trading markets, risk measurement parameters and risk assessment processes. Credit risk measurement is based on the probability of default of an obligor or counterparty, the loss severity given a default event and the exposure at default.

Based on these factors and related market-based inputs, the Firm estimates credit losses for its exposures. Expected credit losses inherent in the wholesale loan portfolios are reflected in the provision for loan losses, and probable credit losses inherent in lending-related commitments are reflected in the provision for lending related commitments. These losses are estimated using empirical statistical analyses and other factors. In addition, potential and unexpected credit losses are reflected in the allocation of credit risk capital and represent the potential volatility of actual losses relative to the established allowances for loan losses and lending related commitments. The analyses for these losses include stress testing (considering alternative economic scenarios) as described in the Stress testing section below. The methodologies used to estimate credit losses depend on the characteristics of the credit exposure, as described below.

### **Risk-rated exposure**

Risk-rated portfolios are generally held in Corporate & Investment Bank. For the risk rated portfolio, credit loss estimates are based on estimates of the probability of default ("PD") and loss severity given a default. The estimation process begins with risk-ratings that are assigned to each loan facility to differentiate risk within the portfolio. These risk ratings are reviewed regularly by Credit Risk management and revised as needed to reflect the borrower's current financial position, risk profile and related collateral. The probability of default is the likelihood that a loan will default and not be fully repaid by the borrower. The loss given default ("LGD") is the estimated loss on the loan that would be realized upon the default of the borrower and takes into consideration collateral and structural support for each credit facility. The probability of default is estimated for each borrower, and a loss given default is estimated for each credit facility. The calculations and assumptions are based on historic experience, financial and economic analysis and management judgment and are reviewed regularly.

### **Stress testing**

Stress testing is important in measuring and managing credit risk in the Firm's credit portfolio. The Firm uses stress testing to inform decisions on setting risk appetite both at a Firm and LOB level. Stress testing results across a range of scenarios and products are regularly reported to relevant management committees providing additional insight into credit portfolio's sensitivities under stress and measurement against risk appetite. This additional insight supports timely management notification and action, when required.

### **Risk monitoring and management**

The Firm has developed policies and practices that are designed to preserve the independence and integrity of the approval and decision-making process of extending credit to ensure credit risks are assessed accurately, approved properly, monitored regularly and managed actively at both the transaction and portfolio levels. The policy framework establishes credit approval authorities, concentration limits, risk-rating methodologies, portfolio review parameters and guidelines for management of distressed exposures. In addition, certain models, assumptions and inputs used in evaluating and monitoring credit risk are independently validated by groups that are separate from the line of businesses.

Wholesale credit risk is monitored regularly at an aggregate portfolio, industry and individual client and counterparty level with established concentration limits that are reviewed and revised as deemed appropriate by management, typically on an annual basis.

Management of the Firm's wholesale credit risk exposure is accomplished through a number of means, including:

- Loan underwriting and credit approval process
- Loan syndications and participations
- Loan sales and securitizations
- Master netting agreements
- Collateral and other risk-reduction techniques

### **Risk reporting**

To enable monitoring of credit risk and effective decision-making, aggregate credit exposure, concentration levels and risk profile changes are reported regularly to senior Credit Risk Management. Detailed portfolio reporting of industry, product and geographic concentrations occurs monthly, and the appropriateness of the allowance for credit losses is reviewed by senior management at least on a quarterly basis. Through the risk reporting and governance structure, credit risk trends and limit exceptions are provided regularly to, and discussed with, senior management and the relevant Board of Directors as appropriate.

## Market Risk

Market risk is the potential for adverse changes in the value of the Firm's assets and liabilities resulting from changes in market variables such as interest rates, foreign exchange rates, equity prices, commodity prices, implied volatilities or credit spreads.

JPMBI applies the Firmwide approach as outlined below, as appropriate to each legal entity, with legal entity specific governance overlay.

Market Risk is an independent risk management function that identifies and monitors market risks throughout the Firm and defines market risk policies and procedures. The Market Risk function reports to the Firm's Chief Risk Officer. Market Risk seeks to control risk, facilitate efficient risk/return decisions, reduce volatility in operating performance and provide transparency into the Firm's market risk profile for senior management, the Board of Directors and regulators. Market Risk is responsible for the following functions:

- Establishment of a market risk policy framework
- Independent measurement, monitoring and control of line of business and firmwide market risk
- Definition, approval and monitoring of limits
- Performance of stress testing and qualitative risk assessments

### **Risk identification and measurement**

Each line of business is responsible for the management of the market risks within its units. The nature of the hedging and risk mitigation strategies performed across the Group corresponds to the market risk management instruments available within each legal entity. These strategies range from the use of traditional market instruments, such as interest rate swaps, to more sophisticated hedging strategies to address a combination of risk factors arising at portfolio level. The independent risk management group responsible for overseeing each line of business is charged with ensuring that all material market risks are appropriately identified, measured, monitored and managed in accordance with the risk policy framework set out by Market Risk.

Because no single measure can reflect all aspects of market risk, the Firm uses various metrics, both statistical and non-statistical, including:

- VaR
- Economic-value stress testing
- Non-statistical risk measures
- Risk identification for large exposures

## **Risk monitoring and management**

Market risk is controlled primarily through a series of limits set in the context of the market environment and business strategy. In setting limits, the Firm takes into consideration factors such as market volatility, product liquidity and accommodation of client business and management experience. The Firm maintains different levels of limits. Corporate level limits include VaR and stress limits. Similarly, line of business limits include VaR and stress limits and may be supplemented by non-statistical measurements. Limits may also be set within the lines of business, as well at the portfolio or legal entity level. Limits are set by Market Risk and are regularly reviewed and updated as appropriate, with any changes approved by lines of business management and Market Risk. Senior management, including the Firm's CEO and CRO, are responsible for reviewing and approving certain of these risk limits on an ongoing basis. All limits that have not been reviewed within specified time periods by Market Risk are escalated to senior management. In JPMI, Market Risk is deemed not material to the entity but is reviewed annually by the Board as part of the ICAAP process. There are no specified market risk limits in place. Market risk may arise due to operational error, in which case, the exposure that the error has generated will be reported to the line of business Market Risk team.

Firmwide, each line of business is responsible for adhering to established limits against which exposures are monitored and reported. Limit breaches are required to be reported in a timely manner by Risk Management to limit approvers, Market Risk and senior management. In the event of a breach, Market Risk consults with Firm senior management and lines of business senior management to determine the appropriate course of action required to return to compliance, which may include a reduction in risk in order to remedy the breach. Certain Firm or line of business-level limits that have been breached for three business days or longer, or by more than 30%, are escalated to senior management and the Firmwide Risk Committee.

## **Risk identification for large exposures**

The Firm has certain potential low-probability but plausible and material, idiosyncratic risks not well captured by its other existing risk analysis and reporting for credit, market, and other risks. These idiosyncratic risks may arise in a number of forms, e.g. changes in legislation, an unusual combination of market events, or specific counterparty events. These identified risks are grouped under the term Risk Identification for Large Exposures ('RIFLEs'). The identified and monitored RIFLEs allow the Firm to monitor earnings vulnerability that is not adequately covered by its other standard risk measurements.

## **Operational risk**

Operational Risk is the risk of loss resulting from inadequate or failed processes or systems or due to external events that are neither market nor credit-related. Operational risk is inherent in the Firm's activities and can manifest itself in various ways, including fraudulent acts, business interruptions, and inappropriate behaviour of employees, failure to comply with applicable laws and regulations or failure of vendors to perform in accordance with their arrangements. These events could result in financial losses, litigation and regulatory fines, as well as other damage to the Firm. The goal is to keep operational risk at appropriate levels, in light of the Firm's financial strength, the characteristics of its businesses, the markets in which it operates, and the competitive and regulatory environment to which it is subject.

## **Risk Identification and Measurement**

To monitor and control operational risk, the Firm maintains an overall Operational Risk Management Framework (ORMF) which comprises governance oversight, risk assessment, capital measurement, and reporting and monitoring. The ORMF is intended to enable the Firm to function with a sound and well-controlled operational environment.

Risk Management is responsible for prescribing the ORMF to the lines of business and corporate functions and to provide independent oversight of its implementation.

The lines of business and corporate functions are responsible for implementing the ORMF. The Firmwide Oversight and Control Group, comprised of dedicated control officers within each of the lines of business and Corporate functional areas, as well as a central oversight team, is responsible for day to day review and monitoring of ORMF execution.

The components of the Operational Risk Management Framework are:

### **Oversight and governance**

Control committees oversee the operational risks and control environment of the respective line of business, function or region. These committees escalate operational risk issues to their respective line of business, function or regional Risk committee and also escalate significant risk issues (and/or risk issues with potential Firmwide impact) to the Firmwide Control Committee ('FCC'). The FCC provides a monthly forum for reviewing and discussing Firmwide operational risk metrics and management, including existing and emerging issues and reviews execution against the ORMF. It escalates significant issues to the Firmwide Risk Committee, as appropriate.

### **Risk self-assessment**

In order to evaluate and monitor operational risk, the lines of business and functions utilize the Firm's standard risk and control self-assessment ('RCSA') process and supporting architecture. The RCSA process requires management to identify material inherent operational risks, assess the design and operating effectiveness of relevant controls in place to mitigate such risks, and evaluate residual risk. Action plans are developed for control issues that are identified, and businesses are held accountable for tracking and resolving issues on a timely basis. Risk performs sample independent challenge of the RCSA programme.

### **Risk reporting and monitoring**

Operational risk management and control reports provide information, including actual operational loss levels, self assessment results and the status of issue resolution to the lines of business and senior management. The purpose of these reports is to enable management to maintain operational risk at appropriate levels within each line of business, to escalate issues and to provide consistent data aggregation across the Firm's businesses and functions. The Firm has a process for capturing, tracking and monitoring operational risk events. The Firm analyses errors and losses and identifies trends. Such analysis enables identification of the causes associated with risk events faced by the lines of business.

## Capital measurement

For information related to operational risk measurement refer to Art. 446.

## Liquidity Risk

Liquidity and funding management for the in scope entities is integrated into the Firmwide liquidity management framework. The primary objectives of effective liquidity management are to ensure that the Firm's core businesses are able to operate in support of client needs, meet contractual and contingent obligations through normal economic cycles as well as stress events, ensure funding mix optimization, and availability of liquidity sources. The Firm manages liquidity and funding using a centralized global approach in order to optimize liquidity sources and uses.

In the context of liquidity management for the entities in scope, the business is responsible for:

- Analysing and understanding the liquidity characteristics of each legal entity's lines of business assets and liabilities, taking into account legal, regulatory, and operational restrictions;
- Defining and monitoring legal entity liquidity strategies, policies, guidelines, and contingency funding plans;
- Managing liquidity within local regulatory requirements and approved internal liquidity risk limits.

The Firm has an independent liquidity risk oversight function whose primary objective is to provide assessment, measurement, monitoring, and control of liquidity risk across the Firm. Liquidity Risk Oversight's responsibilities include, but are not limited to:

- Establishing and monitoring limits, indicators, and thresholds, including liquidity appetite tolerances;
- Defining and monitoring internal Firmwide and legal entity stress tests and regulatory defined stress testing;
- Reporting and monitoring liquidity positions, balance sheet variances and funding activities;
- Conducting ad hoc analysis to identify potential emerging liquidity risks.

The Firm has systems in place to aid in the measurement, management, monitoring and reporting of liquidity risks.

## Stress testing

The legal entity stress tests are intended to ensure sufficient liquidity for the legal entity under a variety of adverse scenarios. Results of stress tests are therefore considered in the formulation of the legal entity's assessment of its liquidity position. Liquidity outflow assumptions are modelled across a range of time horizons and contemplate both market and idiosyncratic stress. Standard stress tests are performed on a regular basis and ad hoc stress tests are performed in response to specific market events or concerns.

Liquidity stress tests assume all of the entity's contractual obligations are met and then take into consideration varying levels of access to unsecured and secured funding markets. Additionally, the assumption with respect to potential non-contractual and contingent outflows is contemplated.

- EBA Liquidity Coverage Ratio (EBA LCR)

The EBA LCR regulation will require JPMBI to hold sufficient high quality liquid assets (HQLA) to survive up to a 30 days horizon under a combined idiosyncratic and market-wide liquidity stress shock.

In October 2015, JPMBI will transition to the EBA LCR as the regulatory minimum requirement for liquidity.

The Basel Committee has issued the final standard for the Net Stable Funding Ratio, which will become a minimum standard by January 1, 2018. This will be a future requirement for JPMBI.

## Interest rate risk in the banking book

The firm's interest rate risk in the banking book (IRRBB) results from traditional banking activities, which includes the extension of loans and credit facilities, and taking deposits (collectively referred to as non-trading activities), and the impact from the investment securities' portfolio and other related Treasury asset-liability management activities. Chief Investment Office (CIO) manages IRRBB exposure on behalf of the firm by identifying, measuring, modelling and monitoring IRR across the firm's balance sheet. CIO identifies and understands material balance sheet impacts of new initiatives and products and executes market transactions to manage IRR through CIO investment portfolio's positions. Execution by CIO will be based on parameters established by policy implemented by senior management. Lines of businesses are responsible for developing and reviewing specific LOB IRR modelling assumptions. In certain legal entities, Treasury manages IRR in partnership with CIO.

### Oversight and governance

The CIO, Treasury and Other Corporate (CTC) Risk Committee is the governing committee with respect to the Firm's IRRBB. The CTC Risk Committee reviews the Firm's IRR Management policy, which is approved by the Firm's Board of Directors, reviews the IRR profile of the firm and compliance with IRR limits, and reviews significant changes to IRR models and/or model assumptions. In addition, IRR exposures and significant model and/or model assumption changes are reviewed by the Firm's Asset and Liability Committee (ALCO). The Asset and Liability Committee provides a framework for overseeing the IRRBB of lines of business, foreign jurisdictions and key legal entities to appropriate line of business ALCOs. The CTC Risk Committee also governs the IRR Oversight Group, an independent dedicated Risk group within CTC and reports into the CTC Chief Risk Officer. IRR Oversight's responsibilities include, but not limited to, the following:

- Providing independent Risk oversight for IRR management
- Creating governance over IRR assumptions and parameter selection/calibration and
- Identifying and monitoring IRR and establishing limits as appropriate



## **Risk identification and measurement**

The Firm conducts simulations of changes in structural interest rate-sensitive revenue under a variety of interest rate scenarios for interest rate-sensitive assets and liabilities. Earnings-at-risk scenarios estimate the sensitivity of pre-tax income to changes in interest rates over rolling 12 months compared to base scenario, utilizing multiple assumptions. These scenarios highlight exposures to changes in interest rates, pricing sensitivities on deposits, optionality and changes in product mix. The scenarios include forecasted balance sheet changes, as well as prepayment and reinvestment behaviour.

For more details on IRRBB for the Firm, refer to the firmwide disclosure and SEC filings.

## **Fiduciary risk**

Fiduciary risk is the risk of a failure to exercise the applicable high standard of care, to act in the best interests of clients as required under applicable law or regulation.

Depending on the fiduciary activity and capacity in which the Firm is acting, federal and state statutes and regulations, and common law require the Firm to adhere to specific duties in which the Firm must always place the client's interests above its own.

Fiduciary Risk Management is the responsibility of the relevant LOB risk and/or other governance committees. Senior business, legal, risk and compliance managers, who have particular responsibility for fiduciary matters, work with the relevant LOB risk committees with the goal of ensuring that businesses providing investment, trusts and estates, or other fiduciary products or services that give rise to fiduciary duties to clients perform at the appropriate standard relative to their fiduciary relationship with a client. Each LOB and its respective risk and/or other governance committees are responsible for the oversight and management of the fiduciary risks in their businesses. Of particular focus are the policies and practices that address a business's responsibilities to a client, including performance and service requirements and expectations; client suitability determinations; and disclosure obligations and communications. In this way, the relevant LOB risk and/or other governance committees provide oversight of the Firm's efforts to monitor, measure and control the performance and delivery of the products or services to clients that may give rise to such fiduciary duties, as well as the Firm's fiduciary responsibilities with respect to the Firm's employee benefit plans.

The Firmwide Fiduciary Risk Governance Committee is a forum for risk matters related to the Firm's fiduciary activities and oversees the firmwide fiduciary risk governance framework. It supports the consistent identification and escalation of fiduciary risk matters by the relevant lines of business or corporate functions responsible for managing fiduciary activities. The committee escalates significant issues to the Firmwide Risk Committee and any other committee considered appropriate.

The Board of JPMBI reviews Fiduciary Risk at each Risk Committee and as part of the annual ICAAP.

## **Business Risk**

J.P. Morgan's stress testing programme is an important component in managing business risk, testing the Firm's financial

resilience in a range of severe economic and market conditions. For example, quarterly baseline and stressed capital plans are prepared under the ICAAP framework, which include P&L projections (as well as RWAs and the overall capital position) over the three-year time horizon modelled. Where these show risks to capital beyond the entities' risk appetite, remedial action is taken.

For new products and services, failure to identify new or changed risks may expose the Group to financial loss or harm its reputation. Accordingly the New Business Initiative Approval (NBIA) policy provides a framework that encourages innovation and the introduction of new products, while making sure that risks are identified, measured, monitored and controlled. LOBs are authorised to introduce new products, services and processes and are responsible for the new products and services they introduce.

Under the NBIA policy, the business is required to undertake an analysis of the economic, regulatory or legal entity capital impact of the new business, as appropriate. Mandatory signoffs for NBIAs include the CRO or legal entity risk manager for each entity and the EMEA Legal Entity Controller, ensuring the risk implications for an entity are considered in NBIA decisions as well as the compatibility of NBIAs with the strategy for relevant entities. A thorough risk review is also required with LOB and cross functional participation to address all potential risks including any heightened risk due to complexity, valuation, future changes in the marketplace and a less favourable economic environment.

## Risk Appetite

The Firm's overall risk appetite is established by management taking into consideration the Firm's capital and liquidity positions, earnings power, and diversified business model. The risk appetite framework is a tool to measure the capacity to take risk and is expressed in loss tolerance parameters at the Firm and/or LOB levels, including tolerances on net income, capital, liquidity risk, credit risk, market risk and structural interest rate risk. Performance against these parameters informs management's strategic decisions and is reported to the Directors Risk Policy Committee.

Various initiatives have been underway to improve the company's risk appetite framework, including:

- Enhancing risk appetite quantitative parameters
- Leveraging capital adequacy and stress testing processes to inform decisions on setting the risk appetite
- Enhancing firmwide communications and training about risk appetite

Key figures and ratios regarding the interaction between the risk profile and the risk tolerance are deemed to be proprietary information as it relates to competitively significant operational conditions and business circumstances, as defined within EBA guidelines EBA/GL/2014/14.

## Board Declaration – Adequacy of Risk Management Arrangements

The Board of JPMBI is satisfied that Management has taken reasonable care to establish and maintain risk systems and controls as appropriate to the business.

## Members of the Board of Directors

### J.P. Morgan Bank (Ireland) plc

The J.P. Morgan Bank (Ireland) plc Board is comprised of 5 non-executive directors and three executive directors. The directors during 2014 were:

- **Dan Kramer**

Mr. Kramer joined the Board of JPMBI in July 2012 while holding the position of Global Head of J.P. Morgan Investor Services' Global Fund Services business. He joined J.P. Morgan in 2006 as the head of Fund Services Operations for JPMorgan Investor Services. Mr. Kramer has more than 28 years of financial experience having held senior positions at several companies. Prior to joining JP Morgan he served as Global Managing Director of Institutional Equities at Thomson Financial, where he led the strategic expansion of the Equities Sales and Trading Segment. His previous positions include Chief Operating Officer at Deutsche Asset Management and Global Head of Stock Loan and Prime Brokerage at Deutsche Bank, and Global Head of Repo at Merrill Lynch. Mr. Kramer holds a Bachelor of Arts degree in Applied Mathematics/Economics, Brown University, Providence, Rhode Island. Mr. Kramer served as Chair of the Board of J.P. Morgan Bank (Ireland) plc and also holds NASD Series 7 and Series 24 licenses. In September 2014, Mr. Kramer resigned from the Board.

- **Christopher Rowland**

Mr. Rowland joined the Board of JPMBI in October 2014. He is currently the Product Executive for J.P. Morgan's Custody business. Additionally he is a board member of J.P. Morgan Bank in Luxembourg. Mr. Rowland has worked at J.P. Morgan twice, most recently joining the firm in 2006 to establish the EMEA product management group for Global Custody followed by running the product development strategy for the Custody business, establishing Corporate and Investment Bank securities processing utilities and running the Global Fund Services business. Previously at J.P. Morgan, Mr. Rowland performed operations, project management and operational outsourcing sales roles covering derivative products in the Investment Bank. Mr. Rowland spent 4 years at BNP Paribas Securities Services where he led the sales and relationship management team for the Direct Custody and Clearing business in the UK. He holds a Bachelor of Arts in history and politics from Swansea University.

- **Carin Bryans**

Ms. Bryans joined the Board of J.P. Morgan Bank (Ireland) plc in July 2002. She is currently responsible for J.P. Morgan's Corporate & Investment Bank business in Ireland. Ms. Bryans joined Chase Manhattan Bank in 1990 and has held a wide range

of positions including head of Operations and Head of Client Services. Ms Bryans holds an undergraduate degree in Finance and International Business from The University of Texas in Austin, and an MBA from The Michael Smurfit Graduate School of Business in Dublin. Ms Bryans was the Chairman of the Irish Funds Industry Association for 2010/2011, is a member of the IFSC Funds Group, and is a founding member of Women in Banking and Finance Ireland.

- **Eilish Finan, BA,BAI; FCA; Dip. Corp. Gov; C.Dir.**

Ms. Finan joined the Board of JPMBI in December 2011 as an independent non executive director of the company.

Ms. Finan is a Chartered Director and a Chartered Accountant with 25 years experience in the Financial Services industry. Ms. Finan is an experienced Board Director, Chairman & Trustee. Her portfolio of board memberships is varied and includes: JP Morgan Bank Ireland, New Ireland Assurance Company, New Technology Insurance, Social Finance Foundation. She also serves on the boards of a number of companies with diverse and international asset management activities. Ms. Finan served a 4 year term on the Board of National Asset Management Agency (NAMA) from 2009-2013. Ms. Finan spent 17+ years as an Executive Director & CFO with AIG Global Investments, where she assumed global responsibility for a variety of regulated businesses operating over multiple asset classes and multiple jurisdictions. In her earlier career, Ms. Finan worked with KPMG as a Chartered Accountant. She is a Fellow of Chartered Accountants Ireland and carries an Electronic Engineering Degree & a BA in Mathematics from Trinity College Dublin. She holds a Diploma in Corporate Governance from the UCD Smurfit Business School and carries the Chartered Director designation from the Institute of Directors in the UK. She holds the designation of Certified Bank Director issued by The Institute of Banking in Ireland.

- **Siobhan Gormley**

Ms. Gormley joined the Board of JPMBI in November 2006. Ms. Gormley is currently Head of Global Custody for the company. Since joining the firm in February 1993, Ms. Gormley has held a range of management positions within the firm, including New Business implementation, Trustee Services, Custody operations and Client Services. Ms. Gormley joined the bank from AIB where she worked for their Investment Management and Custodial Services divisions for several years. Ms. Gormley holds a Bachelor of Financial Services (Hons.) from University College Dublin and a Diploma in Mutual Funds.

- **Stephen Herbert**

Mr. Herbert joined the Board of JPMBI plc in September 2011. He is currently an independent non-Executive director. Mr. Herbert is a US Certified Public Accountant with over thirty years experience in public accounting in the United States and Japan, including twenty two years auditing and consulting in the financial services industry, primarily in banking and securities. Mr. Herbert formerly worked in Deloitte & Touche in the US as a partner in the national and New York office banking and securities practices and Senior Partner in Japan responsible for providing accounting and regulatory consulting services to major international Companies. Mr. Herbert holds a Bachelor of Arts in English and a Master of Science in Accountancy.

- **Evelyn Herlihy**

Ms. Herlihy joined the Board of J.P. Morgan Bank (Ireland) plc in December 2007. She is currently the Chief Risk Officer of the company. Ms. Herlihy joined JPMorgan in 1995. She has previously held roles in Fund Services Operations. Previously Ms. Herlihy trained and worked with KPMG as a Chartered Accountant. Ms. Herlihy holds a Bachelor of Commerce from University College Dublin, a post graduate Diploma in Professional Accounting and is a Fellow of the Institute of Chartered Accountants in Ireland.

- **Ketki Miles**

Ms. Miles joined the Board of J.P. Morgan Bank (Ireland) plc in November 2013. She is currently the Head of Operations for Global Fund Services business. Ms. Miles joined JPMorgan in 1990 and has held a number of diverse positions with increasing responsibility, including head of Technology & Operations for the Asset Management group, head of Operations for Exotics and Hybrids Derivatives, Product Development for Global Derivatives Services, Product Management for Investment Operations Services, Head of Operations in Europe for Investment Operations Services and Hedge Fund Services and most recently as the head of Operations for Accounting in Europe. Ms. Miles holds a Bachelor of Arts in Computer Science from New York University.

- **Swapan Sawhney**

Mr. Sawhney joined the Board of J.P. Morgan Bank (Ireland) plc in August 2012. Until May 2015 he was the regional executive for Investor Services Risk management in EMEA. Mr. Sawhney joined JPM in 1995 and was appointed the Investor Services (IS) Risk Executive for EMEA in 2006. Prior to undertaking his current role, Mr. Sawhney worked in risk roles within Asset and Wealth Management and the Investment Bank. Mr. Sawhney holds a Bachelor of Administration in Business Finance and is a Chartered Accountant with the Institute of Chartered Accountants England & Wales – ICAEW. Mr. Sawhney resigned from the Board in May 2015.

Members of the Board of Directors have held internal and/or external directorships during the year ended December 31, 2014 as follows:

	Internal	External
<b>Carin Bryans</b>	<b>1</b>	<b>1</b>
<b>Elish Finan</b>	<b>1</b>	<b>7</b>
<b>Siobhan Gormley</b>	<b>1</b>	<b>0</b>
<b>Evelyn Herlihy</b>	<b>1</b>	<b>0</b>
<b>Stephen Herbert</b>	<b>1</b>	<b>0</b>
<b>Dan Kramer</b>	<b>1</b>	<b>0</b>
<b>Ketki Miles</b>	<b>1</b>	<b>0</b>
<b>Swapan Sawhney</b>	<b>1</b>	<b>0</b>
<b>Christopher Rowland</b>	<b>1</b>	<b>0</b>

Directorships held within the same group are counted as one directorship, and those in organisations with non-commercial objectives are not counted.

## Diversity & Inclusion

We have a disciplined focus on our Workforce, Workplace and Marketplace – with management accountability as the foundation and element most critical to our ability to hire, train and retain great and diverse employees whose unique perspectives help us realize our business objectives. We are committed to a culture of openness and meritocracy, and believing in giving every individual an opportunity to succeed while bringing their whole selves to work.

## Guiding Principles

- Management accountability – engage managers at all levels of the organization to be responsible for their people platform and incorporate diversity and inclusion into their business and people practices

- Workforce – continuously expand our scope for attracting talent and fostering, supporting and increasing internal mobility across all of our lines of business and functions
- Workplace - create the opportunities for all individuals to contribute and effectively work together to achieve success as a whole.
- Marketplace – recruit quality people who reflect the customers and communities that we serve and the marketplaces where we operate so that we increase our ability to deliver solutions and strengthen our financial performance.

#### Scope and Process

Our firm wide diversity council and regional councils in Latin America, EMEA and Asia in partnership with senior leaders drive the diversity agenda on a local level. Each respective scope is implemented on a regional basis in line with the respective business objectives. Business Resource Groups (BRG), comprised of senior leaders across all businesses, functions and regions, representing different diverse groups help deepen our inclusive work environment. Each BRG is sponsored by an Operating Committee member.

#### Metrics

To drive management accountability, show progress against our plans and determine where we need to focus, a series of firm wide, regional and Line of Business/Function reports are prepared and shared with various levels of management on a scheduled basis (e.g., monthly, quarterly or annually).

#### Target for representation of Women on EMEA Boards

At a regional level, JPMorgan Chase & Co. have set an internal target to achieve 30% representation of women on several boards in EMEA by end of 2015, at which time we will undertake a review. These targets will be achieved through periodic reviews of structure, size, composition and performance of Boards, and a promotion and focus on the existing practices embedded in our Firmwide Diversity & Inclusion Strategy outlined above.

### 3. Own funds (Art. 437)

Table 1. CRD IV regulatory capital for JPMBI

This table shows the components of regulatory capital presented on a transitional and fully loaded basis as at 31 December 2014. This disclosure has been prepared using the format set out in Annex IV and Annex VI of the final 'implementing technical standards with regard to disclosure of own funds requirements for institution' (Commission implementing regulation - EU 1423/2013).

	JPMBI		
	31 December 2014 Transitional Position	Transitional Impacts	31 December 2014 Fully Loaded Position
	\$m	\$m	\$m
<b>Common Equity Tier 1 capital: instruments and reserves</b>			
Capital instruments and the related share premium accounts	57	-	57
Retained earnings	311	-	311
Accumulated other comprehensive income (and other reserves)	-	-	-
<b>Common Equity Tier 1 capital before regulatory adjustments</b>	<b>367</b>	<b>-</b>	<b>367</b>
<b>Common Equity Tier 1 capital: regulatory adjustments</b>			
Goodwill and intangible assets (net of related tax liability)	-	-	-
Additional Value Adjustments	(1)	-	(1)
<b>Total regulatory adjustments to Common Equity Tier 1</b>	<b>(1)</b>	<b>-</b>	<b>(1)</b>
<b>Common Equity Tier 1 capital</b>	<b>366</b>	<b>-</b>	<b>366</b>
<b>Additional Tier 1 (AT1) capital</b>			
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	-	-	-
<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>366</b>	<b>-</b>	<b>366</b>
<b>Tier 2 capital: instruments and provisions</b>			
Capital instruments and the related share premium accounts	-	-	-
<b>Tier 2 capital</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total capital (TC = T1 + T2)</b>	<b>366</b>	<b>-</b>	<b>366</b>
<b>Total risk weighted assets</b>	<b>660</b>	<b>-</b>	<b>660</b>
<b>Capital ratios</b>			
Common Equity Tier 1 (as a percentage of risk exposure amount)	55.48%	-	55.48%
Tier 1 (as a percentage of risk exposure amount)	55.48%	-	55.48%
Total capital (as a percentage of risk exposure amount)	55.48%	-	55.48%
Common Equity Tier 1 available to meet buffers	54.28%	-	54.28%
<b>Amounts below the thresholds for deduction (before risk weighting)</b>			
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)	-	-	-
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)	-	-	-
Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability)	-	-	-

## Capital Instruments

JPMBI does not hold any capital instruments.

Table 2. Summary of main features of capital resources

This table breaks down the capital issued by instrument and provides selected main features. Regulatory capital might differ from the amounts recorded under IFRS due to PRA/FCA requirements. The full terms and conditions of instruments can be found as registered at Companies House. A link to this location is provided on the Basel 3 page of the company website, adjacent to this document.

<http://investor.shareholder.com/jpmorganchase/basel.cfm>

Capital Instruments Main Features All amounts in \$		CET1	CET1
1	Issuer	JPMBI	JPMBI
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A
3	Governing law(s) of the instrument	Irish	Irish
<b>Regulatory treatment</b>			
4	Transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1
5	Post-transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Consolidated	Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Redeemable Shares
8	Amount recognised in regulatory capital (Currency, as of most recent reporting date)	\$56,500,000	\$56,075
9	Nominal amount of instrument	\$1	€1.27
9a	Issue price	\$1	€1.27
9b	Redemption price	N/A	€1.27
10	Accounting classification	Shareholders' equity	Shareholders' equity
11	Original date of issuance	January 1, 1994	January 1, 2002
12	Perpetual or dated	Perpetual	Perpetual
13	Original maturity date	No maturity	No maturity
14	Issuer call subject to prior supervisory approval	No	No
15	Optional call date, contingent call dates and redemption amount	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A



Coupons / dividends		
17	Fixed or floating dividend/coupon	N/A N/A
18	Coupon rate and any related index	N/A N/A
19	Existence of a dividend stopper	N/A N/A
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary Fully discretionary
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary Fully discretionary
21	Existence of step up or other incentive to redeem	N/A N/A
22	Noncumulative or cumulative	N/A N/A
23	Convertible or non-convertible	N/A N/A
24	If convertible, conversion trigger(s)	N/A N/A
25	If convertible, fully or partially	N/A N/A
26	If convertible, conversion rate	N/A N/A
27	If convertible, mandatory or optional conversion	N/A N/A
28	If convertible, specify instrument type convertible into	N/A N/A
29	If convertible, specify issuer of instrument it converts into	N/A N/A
30	Write-down features	N/A N/A
31	If write-down, write-down trigger(s)	N/A N/A
32	If write-down, full or partial	N/A N/A
33	If write-down, permanent or temporary	N/A N/A
34	If temporary write-down, description of write-up mechanism	N/A N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	One class of share & same rights attached to all shares One class of share & same rights attached to all shares
36	Non-compliant transitioned features	N/A N/A
37	If yes, specify non-compliant features	N/A N/A

## 4. Capital requirements (Art. 438)

A strong capital position is essential to the Firm's business strategy and competitive position. The Firm's capital strategy focuses on long-term stability, which enables the Firm to build and invest in market-leading businesses, even in a highly stressed environment.

### Internal Capital Adequacy Assessment Process

The entities in scope complete an Internal Capital Adequacy Assessment Process (ICAAP) on a periodic basis, which provides management with a view of the impact of severe and unexpected events on earnings, risk-weighted assets and capital. The Firm's ICAAP integrates stress testing protocols with capital planning.

The process assesses the potential impact of alternative economic and business scenarios on the Firm's earnings and capital. These scenarios are articulated in terms of macroeconomic factors, which are key drivers of business results; global market shocks, which generate short-term but severe trading losses; and idiosyncratic operational risk events. The scenarios are intended to capture and stress key vulnerabilities and idiosyncratic risks facing the entities in scope. However, when defining a broad range of scenarios, realized events can always be worse. Accordingly, management considers additional stresses outside these scenarios, as necessary. ICAAP results are reviewed by management and the Board of Directors.

### Minimum capital requirements

#### Pillar 1

The Pillar 1 assessment of Operational risk is calculated in accordance with the Basel 3 Basic Indicator Approach (BIA). This approach calculates operational risk capital using a single indicator as a proxy for an institution's overall operational risk exposure – referred to as the "relevant indicator".

The relevant indicator is the sum of a firm's net interest income and its net non-interest income before the deduction of any provisions and operating expenses. The Operational Risk Capital Requirement under the BIA is equal to 15% of the average over the previous 3 years of the relevant indicator. If the relevant indicator for a given year is negative, it is excluded from both the numerator and denominator when calculating the average.

Tables 3 and 4 present minimum capital requirements for JPMBI. The standardized approach has been used for the calculation of Credit Risk and Market Risk Capital Requirements.

The basic indicator approach has been used for the calculation of Operational Risk Capital Requirements. The Large Exposures Capital Requirement is entirely due to exposures to other JPMorgan group entities.

Table 3. Minimum Capital Requirements for Credit Risk (Banking Book) under the Standardised Approach

Own funds credit exposure class	JPMBI
As at 31 December 2014	\$m
Central governments or central banks	-
Public sector entities	-
Multilateral Development Banks	-
Institutions	33
Corporates	3
Secured by mortgages on immovable property	-
Items associated with particularly high risk	-
Claims on institutions and corporate with a short-term credit assessment	-
Other items	-
<b>Total Capital Requirements</b>	<b>36</b>

Table 4: Minimum capital requirement for market risk, settlement risk, large exposures and operational risk

Own funds	
As at 31 December 2014	
	JPMBI \$m
Position Risk	-
Commodities Risk	-
Foreign-Exchange Risk	1
Settlement Risk	-
Large Exposures	-
Operational Risk	16

## 5. Exposure to counterparty credit risk (Art. 439)

### Internal capital and credit limits for counterparty credit exposures

The Firm expresses counterparty credit exposure using three measures of potential future exposure: Peak, Securities / Derivative Risk Equivalent ("S/DRE"), and Average exposure, using Monte-Carlo methods. Monte-Carlo simulation models generate mark-to-market distributions for a portfolio of financial instruments under various future market states. This calculation takes into account the effects of credit risk mitigants, such as close-out netting and collateral agreements.

Peak exposure to a counterparty is an extreme measure of exposure calculated at a 97.5% confidence level. In the case of derivatives, but conceptually similar for securities exposure via SRE, DRE is a measure that expresses the risk of derivative exposure on a basis intended to be equivalent to the risk of loan exposures. The measurement is done by equating the unexpected loss in a derivative counterparty exposure (which takes into consideration both the loss volatility and the credit rating of the counterparty) with the unexpected loss in a loan exposure (which takes into consideration only the credit rating of the counterparty). DRE is a less extreme measure of potential credit loss than Peak and is the primary measure used by the Firm for credit limits and credit approval of derivative transactions. Finally, Average is a measure of the expected fair value of the Firm's derivative receivables at future time periods, including the benefit of collateral. Average exposure over the total life of the derivative contract is used as the primary metric for pricing purposes and is used to calculate credit capital and the CVA

In order to assess the internal credit capital required to support its business in the event of unexpected credit losses, the Firm uses economic credit risk capital. To compute economic credit capital, the loss distribution for the wholesale portfolio is calculated by running Monte-Carlo simulations using J.P. Morgan's Proprietary Capital Model (PCM) with a one-year horizon. The principal drivers of portfolio capital are:

- The risk characteristics of individual exposures; and
- The correlations among different borrowers.

Portfolio capital is allocated to each exposure using a formula based on the exposure's Risk Grade, Probability of Default (PD), Loss Given Default (LGD), Loan Equivalent (LEQ) exposure amount, and tenor.

### Policies for securing collateral and establishing credit reserves, and with respect to wrong-way risk exposures

Entities in scope are covered by firm-wide policies relating to the type of acceptable collateral posted in support of all forms of credit exposure. Cash and certain high quality bonds are generally considered acceptable collateral.

The receipt of collateral to secure credit exposures is reflected through the LGD estimate at the facility level for Traditional Credit Products and through the expected exposure estimate for OTC derivatives and repo-style transactions in the economic capital calculations. The existence of guarantees is reflected in the internal risk grade assigned to the exposure, if the guarantee meets

certain documentation standards and provides acceptable coverage of the obligor's indebtedness and economic and political risks. To address residual risk related to collateral and guarantees, the firm has instituted policies to assess and monitor the enforceability and effectiveness of these credit risk mitigants.

The firm may be exposed to additional credit risk as a result of the wrong way nature of certain OTC derivatives and securities financing trades, or the wrong way nature of collateral taken against OTC derivative exposures. Wrong way risk is broadly defined as the potential for increased correlation between the Firm's exposure to a counterparty (AVG) and the counterparty's credit quality. Accordingly J.P. Morgan has established a credit policy that defines the CIB governance framework and additional controls to cover specific and general wrong way risk. Specific wrong way OTC Derivatives and securities financing trades within JPMS plc will have conservative credit exposure assigned which would lead to the CVA, Regulatory Credit Capital and Economic Credit Capital being much higher than for unrelated trades.

The impact of a downgrade in the Firm's credit rating is considered in the JPMorgan Chase & Co. SEC 10-K filing, at a firmwide level. The nature and magnitude of the impact of ratings downgrades depends on numerous contractual and behavioural factors (which the Firm believes are incorporated in its liquidity risk and stress testing metrics). Credit rating downgrade analysis is incorporated within the internal stress metrics for JPMBI)

## Counterparty Credit Risk analysis

**Table 5. Counterparty credit exposure analysed by financial contract type for JPMBI**

This table shows the counterparty credit risk exposure post-CRM, analysed by the type of financial contract. All derivatives are calculated using the mark to market approach and SFTs use the Financial Collateral Comprehensive Method. 'Other' financial contract type relates to Long Settlement Transactions

Financial Contract Type	JPMBI	
	Mark To Market Approach \$m	Other Approach \$m
<b>As at 31 December 2014</b>		
Interest Rate Contracts	-	-
Foreign Currency Contracts	-	-
Equities Contracts	-	-
Precious Metal other than Gold Contracts	-	-
Commodities other than Precious Metal Contracts	-	-
Securities Financing Transactions	-	-
Credit Derivatives	-	-
Other	-	-
<b>Total</b>	-	-

#### Counterparty credit exposure by approach

JPMBI does not use credit derivatives for hedging purposes

### 6. Credit risk adjustments (Art. 442)

JPMBI did not have any credit risk adjustments for the year end 31st December.

#### Credit risk adjustments for derivatives

JPMBI did not hold any derivatives for the period ended 31<sup>st</sup> December.

#### Credit Risk Exposures before credit risk mitigation

The following tables show the credit risk exposures before the application of credit risk mitigation.

Table 6. Credit Risk Exposures before Credit Risk Mitigation (CRM) for JPMBI

EAD pre-CRM credit exposure class	JPMBI	
	Exposure Pre CRM	Average Exposure Pre CRM over the Year
As at 31 Dec 14	\$m	\$m
Central governments or central banks	26	27
Regional governments or local authorities	-	-
Multilateral development banks	-	-
Institutions	2,029	2,284
Corporates	40	53
Public sector entities	-	-
Past due items	-	-
Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-
Short term claims on institutions and corporates	-	-
Other items	5	5
<b>Total Standardised Approach Credit Risk Exposure</b>	<b>2,100</b>	<b>2,369</b>

#### Geographical location of exposures

These tables show exposure at default pre-CRM (credit risk mitigation), broken down by credit exposure class and geographic location of the counterparty. . In regards to the geographical analysis, the exposures relate to the location in which the customer is based.

Table 7. Geographic analysis of credit exposure for JPMBI

EAD pre-CRM credit exposure class	JPMBI						Total
	United Kingdom	Europe	United States	Africa	Asia	Rest of the world	
As at 31 Dec 14	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	-	26	-	-	-	-	26
Regional governments or local authorities	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-
Institutions	2,001	21	7	-	-	1	2,029
Corporates	-	29	7	-	-	4	40
Retail	-	-	-	-	-	-	-
Mortgages	-	-	-	-	-	-	-
Public sector entities	-	-	-	-	-	-	-
Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-	-	-	-	-	-
Short term claims on institutions and corporates	-	-	-	-	-	-	-
Other items	-	5	-	-	-	-	5
<b>Total Standardised Approach Credit Risk Exposure</b>	<b>2,001</b>	<b>80</b>	<b>14</b>			<b>5</b>	<b>2,100</b>

## Industry analysis of credit exposures

These tables show exposure at default pre-CRM (credit risk mitigation), broken down by credit exposure class and the industrial sector associated with the obligor or counterparty

Table 8. Industry analysis of credit exposure for JPMBI

EAD pre-CRM credit exposure class	JPMBI				Total
	Banks	Non-Bank Financial Institutions	Non-Financial Corporations	Other	
As at 31 Dec 14	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	26	-	-	-	26
Regional governments or local authorities	-	-	-	-	-
Multilateral development banks	-	-	-	-	-
International organisations	-	-	-	-	-
Institutions	2,029	-	-	-	2,029
Corporates	-	40	-	-	40
Retail	-	-	-	-	-
Mortgages	-	-	-	-	-
Public sector entities	-	-	-	-	-
Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-	-	-	-
Short term claims on institutions and corporates	-	-	-	-	-
Other items	-	-	-	5	5
<b>Total Standardised Approach Credit Risk Exposure</b>	<b>2,056</b>	<b>40</b>	<b>-</b>	<b>5</b>	<b>2,100</b>

## Residual maturity analysis of credit exposures

These tables show exposure at default pre-CRM (credit risk mitigation), broken down by credit exposure class and residual maturity. Residual maturity is the remaining number of years before an obligation becomes due according to the existing terms of agreement.

Table 9. Residual maturity analysis of credit exposures for JPMBI

EAD pre-CRM credit exposure class	JPMBI						Total
	On demand and qualifying revolving	Under one year	Over one year but not more than three years	Over three years but not more than five years	Over Five years but not more than ten years	Over ten years or undated	
As at 31 Dec 14	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	26	-	-	-	-	-	26
Regional governments or local authorities	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-
Institutions	2,029	-	-	-	-	-	2,029
Corporates	40	-	-	-	-	-	40
Mortgages	-	-	-	-	-	-	-
Public sector entities	-	-	-	-	-	-	-
Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-	-	-	-	-	-
Short term claims on institutions and corporates	-	-	-	-	-	-	-
Other items	-	-	-	-	5	-	5
<b>Total Standardised Approach Credit Risk Exposure</b>	<b>2,095</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>5</b>	<b>-</b>	<b>2,100</b>

## Past due and impaired loans

JPMBI did not hold any past due and impaired loans for the period ended 31<sup>st</sup> December.

## 7. Unencumbered assets (Art. 443)

As at December 31, 2014 the encumbrance of assets was calculated according to Article 443 CRR and Regulation (EU) 2015/79.

JPMBI does not have any encumbered assets. The carrying amount of unencumbered assets was USD 2.1 billion as at 31 December 2014.



## 8. Use of External Credit Assessment Institutions (Art. 444)

### ECAIs and exposure classes

Under the Standardised approach, risk weighted assets (RWAs) are calculated using credit ratings assigned by External Credit Assessment Institutions (ECAIs).

J. P. Morgan uses the following ECAIs to determine risk weights for this purpose:

- Moody's
- Standard & Poor's (S&P)
- Fitch

These rating assessments are used for calculation of the risk weights for the following classes of exposure:

- Central governments and central banks
- Institutions
- Corporates
- Securitisation positions
- Multilateral development banks
- Regional governments and local authorities
- Short-term claims on institutions and corporates

All other exposure classes are assigned risk weightings described in the Standard approach for RWA calculation in C

### CQS and Risk Weight Mapping for Rated and Unrated Counterparties

J. P. Morgan uses the credit rating to CQS (credit quality step) mapping tables (Table 1 and 2) provided by EBA<sup>3</sup> to determine appropriate CQS for counterparties and securities. Exposures can not be assigned a risk weight lower than sovereign risk weight. Long-term and short-term risk weight percentages are then determined using exposure class and maturity in compliance with CRR<sup>4</sup>.

Table 10. Standardised approach: mapping of ECAIs' credit assessments to credit quality steps. Long term mapping

Credit Quality Step	Fitch's assessments	Moody's assessments	S&P's assessments	Corporate and CIUs	Institution			Sovereign	Securitisation (Standardised Approach)
					Sovereign method	Credit Assessment method			
						Maturity	Maturity 3 months or less		
1	AAA to AA-	Aaa to Aa3	AAA to AA-	20%	20%	20%	20%	0%	20%
2	A+ to A-	A1 to A3	A+ to A-	50%	50%	50%	20%	20%	50%
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	100%	100%	50%	20%	50%	100%
4	BB+ to BB-	Ba1 to Ba3	BB+ to BB-	100%	100%	100%	50%	100%	350%
5	B+ to B-	B1 to B-	B+ to B-	150%	100%	100%	50%	100%	1250%
6	CCC+ and below	Caa1 and below	CCC+ and below	150%	150%	150%	150%	150%	1250%

<sup>3</sup> [http://www.eba.europa.eu/documents/10180/16166/4+August+2006\\_Mapping.pdf](http://www.eba.europa.eu/documents/10180/16166/4+August+2006_Mapping.pdf)

<sup>4</sup> PART THREE, Title III, Chapter II, Section 2, CRR

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0575&from=EN>

Table 11. Standardised approach: mapping of ECAIs' credit assessments to credit quality steps. Short term mapping

Credit Quality Step	Fitch	Moody's	S&P	Risk weight	Securitisation (Standardised approach)
1	F1+, F1	P-1	A-1+, A-1	20%	20%
2	F2	P-2	A-2	50%	50%
3	F3	P-3	A-3	100%	100%
4	Below F3	NP	All short-term ratings below A-3	150%	1250%
5				150%	1250%
6				150%	1250%

If institution is unrated, central government CQS rating is used (or 20% risk weight if maturity is less than 3 months). If corporate is unrated, higher of 100% and central government risk weight is assigned. For an exposure to a regional government or local authority, the risk weight is determined based on the CQS setting applicable to the central government. Unrated central governments and banks are assigned 100% risk weight.

In accordance with Article 139 of the CRR, to determine the risk weight assigned to the issue, the issue credit assessment is used. When no directly applicable credit assessment exists for the issue, the general credit assessment for the issuer is used, provided the criteria stated in CRR<sup>5</sup> are satisfied. Otherwise the issue exposure is treated as unrated.

JP Morgan applies risk weights as prescribed in the CRR<sup>6</sup>.

<sup>5</sup>PART THREE, Title III, Chapter II, Section 2, Article 139 (2), CRR

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0575&from=EN>

<sup>6</sup> PART THREE, Title III, Chapter II, Section 2, CRR

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0575&from=EN>

## Exposures at default pre-, and post-, credit risk mitigation by credit quality step

The following tables show exposures at default pre-CRM (credit risk mitigation), and then at default post-CRM, broken down by credit exposure class and credit quality step. The tables include exposures subject to the Standardised approach.

**Table 12. Credit quality step analysis of Pre CRM exposure and capital deductions under the Standardised Approach for JPMBI**

This table shows exposure at default pre-CRM (credit risk mitigation), broken down by credit exposure class and credit quality step. This table includes exposures subject to the Standardised approach.

EAD pre-CRM credit exposure class	JPMBI							Total
	Credit Quality Step 1	Credit Quality Step 2	Credit Quality Step 3	Credit Quality Step 4	Credit Quality Step 5	Credit Quality Step 6	Unrated (7)	
As at 31 Dec 14	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	-	-	-	-	-	-	26	26
Regional governments or local authorities	-	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-	-
Institutions	2,014	-	15	-	-	-	-	2,029
Corporates	-	-	40	-	-	-	-	40
Retail	-	-	-	-	-	-	-	-
Mortgages	-	-	-	-	-	-	-	-
Public sector entities	-	-	-	-	-	-	-	-
Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-	-	-	-	-	-	-
Short term claims on institutions and corporates	-	-	-	-	-	-	-	-
Other items	-	-	5	-	-	-	-	5
<b>Total Standardised Approach Credit Risk Exposure/Capital</b>	<b>2,014</b>	<b>-</b>	<b>59</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>26</b>	<b>2,100</b>

**Table 13. Credit quality step analysis of Post -CRM exposure and capital deductions under the Standardised Approach for JPMBI**

This table shows exposure at default post-CRM (credit risk mitigation), broken down by credit exposure class and credit quality step. This table includes exposures subject to the Standardised approach.

EAD post-CRM credit exposure class	JPMBI							Total
	Credit Quality Step 1	Credit Quality Step 2	Credit Quality Step 3	Credit Quality Step 4	Credit Quality Step 5	Credit Quality Step 6	Unrated (7)	
As at 31 Dec 14	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	-	-	-	-	-	-	26	26
Regional governments or local authorities	-	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-	-
Institutions	2,023	-	15	-	-	-	-	2,038
Corporates	-	-	31	-	-	-	-	31
Retail	-	-	-	-	-	-	-	-
Mortgages	-	-	-	-	-	-	-	-
Public sector entities	-	-	-	-	-	-	-	-
Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-	-	-	-	-	-	-
Short term claims on institutions and corporates	-	-	-	-	-	-	-	-
Other items	-	-	5	-	-	-	-	5
<b>Total Standardised Approach Credit Risk Exposure/ Capital</b>	<b>2,023</b>	<b>-</b>	<b>51</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>26</b>	<b>2,100</b>

## 9. Exposure to market risk (Art. 445)

JPMBI is only exposed to market risk through foreign exchange risk. Foreign exchange risk is a function of the difference between long and short positions in each currency and the currency mismatch between revenues and costs, where they are un-hedged.

Table 14. Minimum capital requirement for market risk

Market Risk	2014	
	Minimum Capital \$m	RWA \$m
<b>JPMBI</b>		
CAD 1 Model based PRR	-	-
Interest rate PRR	-	-
Equity PRR	-	-
Option PRR	-	-
Collective investment schemes PRR	-	-
Commodity PRR	-	-
Foreign exchange PRR	1	9
<b>Total Market Risk Capital Requirement</b>	<b>1</b>	<b>9</b>

## 10. Operational Risk (Art. 446)

### Pillar 1

For Pillar 1 J. P. Morgan uses the Basic Indicator approach (BIA) to estimate its operational risks for the following entities:

- J. P. Morgan Bank (Ireland) plc

The following tables detail the operational risk RWAs reported in 2014 (Table 1) split by the method used to calculate operational risk capital requirement for each entity.

Table 15. Risk weighted assets for operational risk in 2014

Calculation Method	JPMBI \$m
<b>Basic Indicator Approach</b>	198
<b>Fixed Overhead Requirement</b>	-
<b>TOTAL RWA</b>	<b>198</b>

### Pillar 2

The Pillar 2 assessment is an internal view of the capital required to adequately support the risks of JPMBI legal entities. This assessment takes into account the profile of each material entity specific risk.

The Pillar 2 is based on an allocation of the JPMorgan Chase & Co global operational risk regulatory capital derived from the firm's Advanced Model Approach (AMA) regulatory capital model to the relevant lines of business (LOBs) in JPMBI. The apportionment of capital is based on the global net operating revenue for each LOB in JPMBI.

Firmwide operational risk capital is measured primarily using a statistical model based on the Loss Distribution Approach ("LDA"). The operational risk capital model uses actual losses (internal and external to the Firm), an inventory of material forward-looking potential loss scenarios and adjustments to reflect changes in the quality of the control environment in determining Firmwide operational risk capital. This methodology is designed to comply with the Advanced Measurement rules under the Basel framework.

## 11. Exposure to interest rate risk on positions not included in the trading book (Art. 448)

### Firmwide approach to Interest Rate Risk in the Banking Book

The firm's interest rate risk in the banking book results from traditional banking activities, which includes the extension of loans and credit facilities, and taking deposits (collectively referred to as non-trading activities), and the impact from the investment securities' portfolio and other related Treasury asset-liability management activities. Chief Investment Office (CIO) manages IRRBB exposure on behalf of the firm by identifying, measuring, modelling and monitoring IRR across the firm's balance sheet. CIO identifies and understands material balance sheet impacts of new initiatives and products and executes market transactions to manage IRR through CIO investment portfolio's positions. Execution by CIO will be based on parameters established by senior management, per the CIO Investment Policy. Lines of businesses are responsible for developing and reviewing specific LOB IRR modelling assumptions. In certain Legal entities, Treasury manages IRR in partnership with CIO.

The Firm conducts simulations of changes in structural interest rate-sensitive revenue under a variety of interest rate scenarios for interest rate-sensitive assets and liabilities. Earnings-at-risk scenarios estimate the sensitivity of pre-tax income to changes in interest rates over rolling 12 months compared to base scenario, utilizing multiple assumptions. These scenarios highlight exposures to changes in interest rates, pricing sensitivities on deposits, optionality and changes in product mix. The scenarios include forecasted balance sheet changes, as well as prepayment and reinvestment behaviour.

IRR limits are part of the firmwide market risk limits framework, which is documented in the firmwide Market Risk Management policy.

### IRRBB for J.P. Morgan Bank (Ireland) plc

Interest Rate Risk in the banking book is deemed not material for JPMBI due to the short tenor of the balance sheet. On

the Liability side JPMBI holds client deposits on DDAs, with the majority of the balances in USD, EUR and GBP. These receive overnight interest rates, and the deposits' rate sensitivity to the market rates can vary according to the product type and line of business. On the Asset side JPMBI's excess cash is deposited with JPMCB London Branch on an overnight basis.

## 12. Non Trading Book Equity Investments

On a stand alone basis the non trading book equity positions within JPMBI is related to the holding of an investment in its subsidiary. As these disclosures are made on a consolidated basis there are no non trading equity positions on the balance sheet.

The table below shows the fair value of non trading book equity positions as at December 2014.

## 13. Exposure to Securitisation Positions

There was no activity in securitised exposures in JPMBI throughout 2014.

## 14. Remuneration policy (Art. 450)

The remuneration disclosures required under article 450 of the CRR are disclosed under separate documentation located adjacent to this disclosure on the company website. A link to the relevant page is included here:

<http://investor.shareholder.com/jpmorganchase/basel.cfm>

## 15. Leverage (Art. 451)

### Managing leverage risk

Leverage risk is monitored through the same processes and frameworks as capital adequacy and stress-testing. The latter is particularly important, as it is forward-looking: if the Firm's leverage ratios remain sustainable under stressed conditions, the risk of forced de-leveraging will be low.

The capital adequacy framework is based around a regular cycle of point-in-time capital calculations and reporting, supplemented by forward-looking projections and stress-testing, with corrective action taken as and when required to maintain an appropriate level of capitalisation. Each part of the process is subject to rigorous control.

Periodically, the Firm completes the Internal Capital Adequacy Assessment Process (ICAAP), which provides management with a view of the impact of severe and unexpected events on earnings, risk-weighted assets, capital and leverage. The Firm's ICAAP integrates stress testing protocols with capital planning.

The process assesses the potential impact of alternative economic and business scenarios on the Firm's earnings and capital. These scenarios are articulated in terms of macroeconomic factors, which are key drivers of business results; global market shocks, which generate short-term but severe trading losses; and idiosyncratic operational risk events. The scenarios are intended to capture and stress key vulnerabilities and idiosyncratic risks facing the Firm. However, when defining a broad range of scenarios, realized events can always be worse. Accordingly, management considers additional stresses outside these scenarios, as necessary. ICAAP results are reviewed by management and the relevant Boards of Directors.

Table 16. Summary reconciliation of accounting assets and leverage ratio exposures (continued)

CRR Leverage Ratio		JPMBI \$m
Table LRCom: Leverage ratio common disclosure		CRR leverage ratio exposures
<b>On-balance sheet exposures (excl. derivatives and SFTs)</b>		
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	2,100
2	(Asset amounts deducted in determining Tier 1 capital)	(1)
3	<b>Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)</b>	-
<b>Derivative exposures</b>		<b>2,099</b>
4	Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	-
5	Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)	-
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	<b>Total derivative exposures (sum of lines 4 to 10)</b>	-
<b>Securities financing transaction exposures</b>		
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)	-
EU-14a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Article 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	<b>Total securities financing transaction exposures (sum of lines 12 to 15a)</b>	-
<b>Other off-balance sheet exposures</b>		
17	Off-balance sheet exposures at gross notional amount	-
18	(Adjustments for conversion to credit equivalent amounts)	-
19	<b>Other off-balance sheet exposures (sum of lines 17 to 18)</b>	-
<b>Exempted exposures in accordance with CRR Article 429 (7) and (14) (on and off balance sheet)</b>		
EU-19a	(Exemption of intragroup exposures (solo basis) 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))	-
<b>Capital and Total Exposure</b>		
20	<b>Tier 1 capital</b>	<b>366</b>
21	<b>Total leverage ratio exposures (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)</b>	-
<b>Leverage ratio</b>		
22	Leverage ratio	17.44%
<b>Choice on transitional arrangements and amount of derecognised fiduciary items</b>		
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	-

## 16. Disclosures not applicable to JPMBI for the period ending 31 December 2014

The following Articles of CRR are not applicable as at December 31, 2014:

- Capital buffers (Art. 440)
- Indicators of global systemic importance (Art. 441)
- Credit risk adjustments (Art. 442)
- Unencumbered assets (Art. 443)
- Use of the IRB Approach to credit risk (Art. 452)
- Use of credit risk mitigation techniques (Art. 453)
- Use of the Advanced Measurement Approaches to operational risk (Art. 454)
- Use of Internal Market Risk Models (Art. 455)