# Pillar 3 Disclosure Report as at 31.12.2016

J.P. Morgan Bank (Ireland) plc

30th September 2017



# **Table of Contents**

1.Introduction	4
2.Risk management and objectives (Art. 435)	6
3.0wn funds (Art. 437)	14
4.Capital requirements (Art. 438)	17
5.Capital Planning Buffer	20
6.Credit risk adjustments (Art. 442)	21
7.Intra Group Financial Support Disclosure	23
8. Unencumbered assets (Art. 443)	23
9.Use of External Credit Assessment Institutions (Art. 444)	24
10.Exposure to market risk (Art. 445)	27
11.Operational Risk (Art. 446)	28
12.Exposure to interest rate risk on positions not included in the trading book (Art. 448)	30
13.Non Trading Book Equity Investments	31
14.Remuneration policy (Art. 450)	32
15.Leverage (Art.451)	33
16.Use of Credit Risk Mitigation techniques (Art. 453)	35
17. Disclosures not applicable to JPMBI for the period ending 31 December 2016	35

# **List of Tables**

Exhibit 1: JPMBI Three Line of Defence	7
Exhibit 2: Member of the Board of Directors	13
Exhibit 3: CRD IV regulatory capital for JPMBI	14
Exhibit 4: Summary of main features of capital resources	16
Exhibit 5: Minimum Capital Requirements for Credit Risk (Banking Book) under the Standardise	
Exhibit 6: Minimum capital requirement for market risk, settlement risk, large exposures and o	perational
risk	19
Exhibit 7: Credit Risk Exposures before Credit Risk Mitigation (CRM) for JPMBI	21
Exhibit 8: Geographic analysis of credit exposure for JPMBI	22
Exhibit 9: Industry analysis of credit exposure for JPMBI	22
Exhibit 10: Residual maturity analysis of credit exposures for JPMBI	23
Exhibit 11: Standardised approach: mapping of ECAIs' credit assessments to credit quality step	
mapping	24
Exhibit 12: Standardised approach: mapping of ECAIs' credit assessments to credit quality step	s. Short term
mapping	25
Exhibit 13: Credit quality step analysis of Pre CRM exposure and capital deductions under the S	Standardised
Approach for JPMBI	25
Exhibit 14: Credit quality step analysis of Post -CRM exposure and capital deductions under the	Standardised
Approach for JPMBI	26
Exhibit 15: Minimum capital requirement for market risk	27
Exhibit 16: Risk weighted assets for operational risk in 2016	29
Exhibit 17: Sensitivity of the Banking Book to interest rate changes	
Exhibit 18: Leverage ratio common disclosure	

# Pillar 3 Disclosure Report 2016

#### 1. Introduction

## Background

The Basel Committee on Banking Supervision published its set of rules on 16 December 2010, referred to as Basel III. The Basel framework consists of a three "Pillar" approach:

- Pillar 1 establishes minimum capital requirements, defines eligible capital instruments, and prescribes rules for calculating RWA.
- Pillar 2 requires banks to have an internal capital adequacy assessment process and requires that banking supervisors
  evaluate each bank's overall risk profile as well as its risk management and internal control processes.
- Pillar 3 encourages market discipline through disclosure requirements which allow market participants to assess the risk and capital profiles of banks.

The transposition of the Basel III framework into European law is in two parts: 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 provides information on the capital structure, capital adequacy, risk exposures, and risk weighted assets 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).1

In accordance with Article 432 CRR and EBA guidelines in EBA/GL/2014/142 on material, proprietary or confidential information, the representations in this report are based on materiality as defined in EBA/GL/2014/14.

## 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

https://investor.shareholder.com/jpmorganchase/basel.cfm

<sup>&</sup>lt;sup>1</sup> EBA Final draft Implementing Technical Standards on the disclosure of Own Funds 26th July 2013. EBA Final draft Implementing Technical Standards amending ITS on the disclosure of Leverage Ratio 15th June 2015.

<sup>&</sup>lt;sup>2</sup> EBA Guidelines on materiality, proprietary and confidentiality and on disclosure frequency 23rd December 2014.

## 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 Treasury Services
- Investor Services –Trustee and Custody & Fund Services

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 JPMorgan Chase & Co. ("JPMorgan Chase"), a financial holding company incorporated under Delaware law in 1968.

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

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

The above report should be read in conjunction with the Annual Report on Form 10-K and the Quarterly Report on Form 10-Q which have been filed with the U.S. Securities and Exchange Commission and available at the following link:

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

This document refers to JPMorgan Chase or the "Firm" when referring to frameworks, methodologies, systems and controls that are adopted throughout JPMorgan Chase & Co. 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 JPMorgan Chase's business activities. The Firm's overall objective is to manage its businesses, and the associated risks, in a manner that balances serving the interests of its clients, customers and investors and protects the safety and soundness of the Firm. Firmwide Risk Management is overseen and managed on an enterprise-wide basis. The Firm's approach to risk management covers a broad spectrum of risk areas, such as credit, market, liquidity, model, structural interest rate, principal, country, operational, compliance, legal, capital and reputation risk, with controls and governance established for each area, as appropriate.

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 of the lines of business ("LOB") and corporate functions; and
- Firmwide structures for risk governance.

The Firm's Operating Committee, which consists of the Firm's Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO"), Chief Risk Officer ("CRO") and other senior executives, is responsible for developing and executing the Firm's risk management framework. The framework is intended to provide controls and ongoing management of key risks inherent in the Firm's business activities and create a culture of transparency, awareness and personal responsibility through reporting, collaboration, discussion, escalation and sharing of information. The Operating Committee is responsible and accountable to the Firm's Board of Directors.

The Firm's CRO is the head of the Independent Risk Management ("IRM") function and reports to the CEO and the Directors' Risk Policy Committee ("DRPC"). The CEO appoints the CRO to create the Risk Management Framework subject to approval by the DRPC in the form of the Primary Risk Policies. The Chief Compliance Officer ("CCO"), who reports to the CRO, is also responsible for reporting to the Audit Committee for the Global Compliance Program. The Firm's Global Compliance Program focuses on overseeing compliance with laws, rules and regulations applicable to the Firm's products and services to clients and counterparties.

The IRM function, comprised of Risk Management and Compliance Organizations, is independent of the businesses. The IRM function sets various standards for the risk management governance framework, including risk policy, identification, measurement, assessment, testing, limit setting (e.g., risk appetite, thresholds, etc.), monitoring and reporting. Various groups within the IRM function are aligned to the LOBs and to corporate functions, regions and core areas of risk such as credit, market, country and liquidity risks, as well as operational, model and reputational risk governance.

The Firm places key reliance on each of its LOBs and other functional areas giving rise to risk. Each LOB or other functional area giving rise to risk is expected to operate its activities within the parameters identified by the IRM function, and within their own management-identified risk and control standards. Because these LOBs and functional areas are accountable for identifying and addressing the risks in their respective businesses and for operating within a sound control environment, they are considered the "first line of defense" within the Firm's risk governance framework.

The Firmwide Oversight and Control Group consists of dedicated control officers within each of the lines of business and corporate functions, as well as having a central oversight function. The group is charged with enhancing the Firm's control environment by looking within and across the lines of business and corporate functions to help identify and remediate control issues. The group enables the Firm to detect control problems more quickly, escalate issues promptly and engage other stakeholders to understand common themes and interdependencies among the various parts of the Firm.

As the "second line of defense", the IRM function provides oversight and independent challenge, consistent with its policies and framework, to the risk-creating LOBs and functional areas.

Internal Audit, a function independent of the businesses and the IRM function, tests and evaluates the Firm's risk governance and management, as well as its internal control processes. This function, the "third line of defense" in the risk governance framework, brings a systematic and disciplined approach to evaluating and improving the effectiveness of the Firm's governance, risk management and internal control processes. The Internal Audit Function is headed by the General Auditor, who reports to the Audit Committee.

The independent status of the IRM function is supported by a governance structure that provides for escalation of risk issues to senior management, the Firmwide Risk Committee, or the Board of Directors.

## Three Lines of Defence

JPMBI maintains a philosophy of strong corporate governance. Key participants include:

- JPMBI Board of Directors who own the risk appetite of the Bank;
- JPMBI Senior Management delegated by the Board to perform the day-to-day management of the Bank;
- JPMBI Internal Control functions.

The model adopted by JPMBI can be illustrated as follows:



Exhibit 1: JPMBI Three Line of Defence

- The First Line of Defence is represented by the business units that take or acquire risks and are responsible for monitoring, assessing and improving the operational control environment on a continuous basis.
- The Second Line of Defence is represented by four distinct risk and controls functions Risk Management, Compliance, Financial Control and Information Technology Governance and Controls that act as advisories to the business on a day-to-day basis but have the power and independence to report and escalate risks or business issues directly to JPMBI Senior Management and ultimately the Directors of the Board.
- The Third Line of Defence is represented by Internal Audit who provides JPMBI Senior Management and the Directors of the Board with independent assessment on the effectiveness of the internal controls established.

The model adopted by JPMBI is in line with the J.P. Morgan corporate three lines of defence model.

The Board of Directors completes its supervisory role by reviewing the summary reports prepared by the internal control functions at least once a year. The Bank's policies set standards of control and conduct for which responsibility is given to Management for ensuring compliance.

## Risk Governance and Oversight

## Regional Governance

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

Each regulated legal entity has its own Board of Directors which is accountable for overall oversight of the entity. The Boards delegate certain matters to a number of key regional Committees for regional risk control and oversight. The EMEA governance framework connects legal entity, LOB and global governance structures. The key committees of relevance are the UK Management Committee ("UKMC"), the EMEA Risk Committee ("ERC") and the EMEA Operating Committee ("EOC"):

- The UKMC provides oversight for any business conducted in UK or booked into UK entities (excluding Asset Management entities). The UKMC ensures that any significant decisions are aligned to the Firm's strategy in light of any relevant UK regulatory requirements, considers the material risks and issues that are escalated to the UKMC, and provides the necessary oversight and challenge for any proposed mitigation/remediation activities. The UKMC is accountable to the Boards of the individual legal entities
- The 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 UKMC 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 24 times during 2016
- The 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 UKMC 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 Boards of the individual legal entities, and oversees the integrity of financial statements, monitors and reviews internal financial controls and the effectiveness of the Internal Audit function.

## Legal Entity Risk Governance and Oversight Framework

The firm-wide Legal Entity Risk Governance and Oversight framework assigns Risk Tiers from 1 to 4 to the Firm's significant operating entities across all lines of business based on qualitative and quantitative factors, where Tier 1 represents the highest level of Risk Management oversight required. Legal Entity Risk Managers ("LERM") are appointed for all Risk Tier 1, 2 and 3 entities.

In accordance with the Legal Entity Risk Governance and Oversight Framework, the ERC provides specific legal entity risk oversight of Risk Tier 1 entities in addition to its regional risk oversight, while the Legal Entity Risk Committee ("LERC") (a sub-committee of the ERC) provides legal entity risk oversight of Risk Tier 2 and 3 entities. JPMBI is classified as Risk Tier 2 entity in this framework.

#### JPMBI Risk Governance Framework

JPMBI is closely aligned to the regional and firmwide risk governance structure. JPMBI has a local CRO (equivalent to LERM) who is a permanent member of the EMEA Legal Entity Risk Committee (LERC) and is responsible for overseeing the risks in the entity. The individual Members of the LERC are responsible for identifying and escalating risk and capital issues and incidents that may be relevant.

## JPMBI Risk Committee

JPMBI's Risk Committee convenes and reports to JPMBI's Board of Directors on a quarterly basis. The membership of the Risk Committee is composed of a majority of non-executive directors and is chaired by a non-executive director in accordance with the CBI's Corporate

Governance Requirements. The role and responsibilities of the Risk Committee are set out in its Terms of Reference which are reviewed by the Committee on at least an annual basis.

The main responsibility of the Risk Committee is to assist the Board of Directors in its mission to assess the adequacy of the risks that are assessed and the institution's ability to manage these risks; the internal and regulatory own funds and liquidity reserves. The proceedings of the Risk Committee are documented in meeting minutes and approved by the Risk Committee. In addition, the minutes are provided to JPMBI's Board of Directors.

#### JPMBI Custody and Funds Services Executive Meeting (CFS) - Senior Management Team (SMT)

The CFS Executive meeting (also referred to as SMT) is in charge of the effective, sound and prudent day-to-day business and risk management. Responsibility is delegated by the JPMBI Board of Directors to the SMT to implement the strategies and guiding principles laid down by the JPMBI Board of Directors in addition to the day to day running of the institution. Members of the SMT rely upon, and escalate into, an EMEA governance structure as illustrated at Appendix 2a. The JPMBI SMT meeting was replaced in January 2017 by the Custody & Fund Services (CFS) Executive Meeting. In addition, the JPMBI Board of Directors relies on the three internal control functions to maintain the legal entity control environment. In accordance with the CBI's Corporate Governance Requirements, the internal control functions are the risk function, the compliance function and the internal audit function. These functions are headed by the Chief Risk Officer, the Head of Compliance and the Head of Internal Audit respectively.

## JPMBI Outsourcing Governance Forum

The JPM Ireland Outsourcing Governance Forum is a forum established on behalf of the Boards. It convenes on a monthly basis and an ad hoc basis as required. The forum is responsible for the governance and oversight of inter-affiliate operations outsourcing on behalf of the Irish Legal entities. The objectives of the forum are; Governance and oversight of inter-affiliate outsourcing of operational activity. Establishment of best practices on behalf of the Legal entities as it relates to inter-affiliate outsourcing.

## JPMBI Location Operational Risk & Control Committee (LORCC)

The role of the LORCC is to act as a cross line of business & functions committee for any business conducted in the location or booked into the location. The LORCC has responsibility for the review of operational risk control themes and issues in the location and for the escalation to the Local Infrastructure Operating Committee (LIOC), as well as holding members accountable for remediating such themes and issues.

## Identification and measurement of key risks

JPMBI's ability to properly measure, monitor and report risk is critical to both its soundness and profitability. JPMBI adheres to the firmwide risk policy framework, which includes a combination of firmwide risk policies as well as legal entity specific policies. Furthermore, JPMBI has an established Risk Identification and Assessment process to monitor and analyse the impact of material risks on the amount of internal capital necessary to cover those risks. The key risks that JPMBI is exposed to are Credit Risk, Operational Risk, Concentration Risk, Interest Rate Risk in the Banking Book (IRRBB), Business Risk, Reputational Risk, Governance Risk and Group Risk.

The key risk types JPMBI is exposed to for Capital allocation purposes are Credit and Operational and risks.

Operational Risk represents a material risk for JPMBI, which is an entity with established processes and a developed infrastructure to support the businesses conducted at the legal entity level: Depository Bank (Custody and Trust & Fiduciary), Demand Deposit Accounts, and Fund Accounting and Transfer Agency services provided through its 100% owned subsidiary. To monitor and control operational risk, the Firm maintains an Operational Risk Management Framework (ORMF), detailed in section 11.

Credit Risk represents also a material risk and may encompass overdrafts to custody clients, intercompany deposits and, intraday and overnight overdrafts to corporate clients.

Loans and advances to customers described in the annual accounts are the result of temporary overdrafts granted to clients. The Bank's lending is limited to short-term overdrafts linked to Investment Fund operations.

JPMBI places its overnight liquidity with its parent JPMCB N.A, London Branch.

Credit concentration risk is managed at the firmwide level through a matrix of credit family exposure thresholds, industry limits and country risk limits. JPMBI monitors, reviews and accounts for concentration risk on ongoing basis: JPMBI is exposed to concentration risk in the form of Group Risk and Credit Concentration Risk.

Further details on Credit and Concentration Risks are provided in section 4.

## Other risk types considered as part of Pillar 2 calculations:

Interest Rate Risk in the Banking Book (IRRBB) is defined as interest rate risk resulting from the Firm's traditional banking activities (accrual accounted on and off balance sheet positions) which includes extension of loans and credit facilities, taking deposits and issuing debt (collectively referred to as 'non-trading' activities); and also the impact from Chief Investment Office (CIO) investment portfolio and other related CIO, Treasury activities

Bank aims to reduce its legal and reputational risk by ensuring amongst other things the following:

- Subject all staff to the Code of Conduct and obtain their affirmation that they have complied with the rules and principles on an annual basis;
- Capture and review clients' complaints on a timely basis and take timely action to prevent any escalation of a potential litigation;
- Employing qualified employees and provide regular mandatory training;
- Ensuring that senior managers understand the responsibilities of oversight and fostering a culture of escalation within the Bank.
- Additionally all staff receive culture and conduct training to ensure employees understand the responsibilities of oversight and
  to foster a culture of escalation within the bank.

Business risk is the risk that JPMC or Lines of Business will make inappropriate strategic choices, or are unable successfully to implement selected strategies; and of loss due to variances in volumes, revenue and costs caused by competitive forces, regulatory changes, or other macroeconomic or market issues.

Business risk is managed through JPMBI's strategic and business planning as part of its Capital Management Framework.

Governance Risk is the risk that JPMBI does not have appropriate personnel, structures or procedures in place to ensure sound and prudent management of the firm. This may include the risk of deviation from regulations designed to achieve good governance in credit institutions such as the Central Bank of Ireland's Corporate Governance Code or a deviation from tax transfer pricing which could adversely impact on the long-term viability of the company.

As a subsidiary of a highly regulated global financial group it is firmly rooted in group risk governance structures, processes and methodologies. The governance structures that are adopted by JPMBI follow best group practice and have been adjudged by the board and management to be appropriately designed so as to materially comply with the Irish Central Bank's governance requirements. Core governance risk is managed locally.

## Risk Appetite

The risk appetite framework for JPMBI is established by management taking into consideration the Entity'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 through qualitative factors and quantitative parameters, including quantitative parameters on capital, liquidity and credit risks. Performance against these parameters informs management's strategic decisions and is reported quarterly to the JPMBI Risk Committee.

Key figures and ratios regarding the interaction between the risk profile and the risk appetite 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 its 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 2016 were:

#### Christopher Rowland

Mr. Rowland joined the Board of JPMBI in October 2014. He is currently the Product Executive and Global Head of Depository 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.

### Declan Breslin

Mr. Breslin is a Managing Director and Global Head of Client Service and Implementation for Custody and Fund Services (CFS). His team is responsible for the day-to-day client service and onboarding for the clients on J.P. Morgan's CFS platform. Declan began his career in London with Deutsche Bank before moving to Lehman Brothers in 2003, where he ran Client Service and Transition across all products both pre- and post- bankruptcy. He worked closely with the administrator post-bankruptcy before transferring to Nomura International to build out their global Prime Brokerage platform. Declan graduated from the Queen's University of Belfast in 1998 with a Bachelor of Science in Finance and holds a Master of Science in Finance from the University of London.

#### Ed Neeck

Mr. Neeck is a Managing Director and head of Risk Management for J.P. Morgan Investor Services -Custody & Fund Services. He is responsible for risk management related activities for all Custody & Fund Services products including: Custody, Fund Accounting, Fund Administration, Agency Lending, Depository Receipts, Transfer Agency, Investment Operations Services, Hedge Fund Services and Private Equity and Real Estate Services. In addition to holding several senior Risk Management positions in Investor Services, Mr. Neeck has also held many other key positions since he joined J.P. Morgan over 25 years ago. He served as head of Network Management and oversaw the management of the firm's relationships with cash correspondent and sub-custodian banks. He started his career at J.P. Morgan in internal auditing and moved on to senior roles in operations, product management.

#### 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

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 26 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. Ms. Gormley resigned from the Board on 29/09/2016.

#### 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 of 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 J.P. Morgan 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.

Members of the Board of Directors have held internal and/or external directorships at the year ended December 31, 2015 as follows:

Name	Internal Directorships	External Directorships	
Carin Bryans	1	2	
Ellish Finan	1	7	
Siobhan Gormley	1	0	
Evelyn Herlihy	1	0	
Stephen Herbert	1	0	
Christopher Rowland	1	0	
New: Declan Breslin	1	0	
New: Ed Neeck	1	0	

Exhibit 2: Member of the Board of Directors

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

## **Diversity & Inclusion**

Diversity and Inclusion are the cornerstones of the Firm's corporate culture. It's part of our DNA. We recognize that we gain strength from a diverse workforce and embrace our differences. At our firm, we are committed to a culture of openness and meritocracy, and believe in giving every individual an opportunity to succeed while bringing their whole selves to work. Our diverse employee base and inclusive environment are strengths that lead to the best solutions for our customers and for every community that we serve.

At a regional level, the Firm has set an internal target to achieve 30% representation of women on several boards in EMEA. 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 firm-wide Diversity & Inclusion Strategy. Further information on this Strategy is available at <a href="https://www.jpmorgan.com/global/emea/crd4">https://www.jpmorgan.com/global/emea/crd4</a>.

# 3. Own funds (Art. 437)

This table shows the components of regulatory capital presented on a transitional and fully loaded basis as at 31 December 2016. 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 2016 Transitional Position	Transitional Impacts	31 December 2016 Fully Loaded Position
	\$m	\$m	\$m
Common Equity Tier 1 capital: instruments and reserves			
Capital instruments and the related share premium accounts	57	-	57
Retained earnings	349	-	349
Accumulated other comprehensive income (and other reserves)	-	-	-
Common Equity Tier 1 capital before regulatory adjustments	405	-	405
Common Equity Tier 1 capital: regulatory adjustments			
Goodwill and intangible assets (net of related tax liability)	-	-	-
Additional Value Adjustments	(1)	-	(1)
Total regulatory adjustments to Common Equity Tier 1	(1)	-	(1)
Common Equity Tier 1 capital	404	-	404
Additional Tier 1 (AT1) capital			
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	-	-	-
Tier 1 capital (T1 = CET1 + AT1)	404	-	404
Tier 2 capital: instruments and provisions			
Capital instruments and the related share premium accounts	-	-	-
Tier 2 capital	-	-	-
Total capital (TC = T1 + T2)	404	-	404
Total risk weighted assets	494	-	494
Capital ratios			
Common Equity Tier 1 (as a percentage of risk exposure amount)	81.74%	-	81.74%
Tier 1 (as a percentage of risk exposure amount)	81.74%	-	81.74%
Total capital (as a percentage of risk exposure amount)	81.74%	-	81.74%
Common Equity Tier 1 available to meet buffers	81.74%	-	81.74%
Amounts below the thresholds for deduction (before risk weighting)			
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)	-	-	-
Exhibit 2: CDD IV requilatery conital for IDS	ADI		

Exhibit 3: CRD IV regulatory capital for JPMBI

# **Capital Instruments**

JPMBI does not hold any capital instruments.

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. <a href="http://investor.shareholder.com/jpmorganchase/basel.cfm">http://investor.shareholder.com/jpmorganchase/basel.cfm</a>

	nounts 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
Regu	latory treatment		
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

Coup	ons / 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	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionar y
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionar
21	Existence of step up or other incentive to redeem	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible
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	No	No
37	If yes, specify non-compliant features	N/A	N/A

Exhibit 4: Summary of main features of capital resources <sup>3</sup>

<sup>3</sup> Answers in the Main Features of Regulatory Capital Instruments table have been provided using the list of options provided in the COMMISSION IMPLEMENTING REGULATION (EU) No 1423/2013. Rows 19, 21, 22, 23 and 36 are N/A for the ordinary shares

# 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.

The key risk types JPMBI is exposed to for Capital allocation purposes are Operational risk and Credit risk.

## Operation Risk capital measurement

#### Firmwide approach

In addition to the level of actual operational risk losses, operational risk measurement includes operational risk based capital and operational risk losses under both baseline and stressed conditions. The primary component of the operational risk capital estimate is the Loss Distribution Approach ("LDA") statistical model, which simulates the frequency and severity of future operational risk loss projections based on historical data. The LDA model is used to estimate an aggregate operational risk loss over a one-year time horizon, at a 99.9% confidence level. The LDA model incorporates actual internal operational risk losses in the quarter following the period in which those losses were realized, and the calculation generally continues to reflect such losses even after the issues or business activities giving rise to the losses have been remediated or reduced. As required under the Basel III capital framework, the Firm's operational risk-based capital methodology, which uses the Advanced Measurement Approach, incorporates internal and external losses as well as management's view of tail risk captured through operational risk scenario analysis, and evaluation of key business environment and internal control metrics. The Firm considers the impact of stressed economic conditions on operational risk losses and develops a forward looking view of material operational risk events that may occur in a stressed environment. The Firm's operational risk stress testing framework is utilized in calculating results for the Firm's Comprehensive Capital Analysis Review ("CCAR") and Internal Capital Adequacy Assessment Process ("ICAAP") processes.

## JPMBI assessment

JPMBI calculates the Operational Risk Capital Requirement for Pillar 1 using the Basic Indicator Approach (BIA). The Pillar 1 assessment of Operational risk is a minimum regulatory capital requirement calculated in accordance with the BIA under Basel 3. 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.

In addition to Pillar 1 assessment, JPMBI adopted an internal approach to calculate operational risk capital under Pillar 2.

The Pillar 2 calculation is based on the Basic Indicator Approach (BIA) adjusted for the JPMorgan Chase's (JPMC) risk profile as calculated in JPMC's global operational risk regulatory capital (ORC). JPMC's Operational Risk Capital is derived from the firm's Advanced Model Approach (AMA) regulatory capital model which also produces ORC for each major line of business (LOBs). The ORC attributed to each LOB in the global model, and the global revenue for these LOBs are used to determine the risk profile of a given LOB and are used in determining the Pillar 2 ORC for JPMBI as follows:

- Calculating "global LOB ratios";
- Dividing firm wide ORC allocated to each global LOB by net operating revenues of that global LOB over the last 12 months;
- Multiplying the "global LOB ratios" and a total of net operating revenues booked by each LOB to that entity. The global net operating
  revenues for each LE attributed to the corporate sector in the last 12 months are incorporated in the total global net operating revenues of
  the predominant LOB of that entity (i.e. the LOB that has the higher net operating revenues).

## Credit Risk capital measurement

JPMBI calculates the Credit Risk Capital Requirement for Pillar 1 using the Strandardized Approach (SA).

For JPMBI's Pillar 2 Credit risk assessment, J.P. Morgan's Advanced Internal Ratings Based (AIRB) model has been used to quantify required capital. This is a more risk-sensitive measure of capital, taking into account more accurately both the risk of individual exposures and, to an extent, correlation factors and hence concentrations in the portfolio.

Credit risk capital requirements calculated using AIRB risk weights are calculated at the portfolio level and compared to the portfolio level standardized pillar 1 risk weights. Where the AIRB assessment shows the overall Pillar 1 charge to be deficient, additional capital will be held. The minimum internal capital requirement has been set to 8% in accordance with the regulatory limit under Pillar 1.

In general, risk weights under the AIRB approach are lower than under the predefined Standardized Approach, which leads to a lower amount of Risk Weighted Assets (RWA) under Pillar 2. At December 31, 2016, the overall Pillar 2 RWA exceeds the Pillar 1 amount.

To be added that J.P. Morgan also has an internal Economic Credit Capital ('ECC') model measuring default losses, change in accounting reserves and mark-to-market losses for Pillar 2A credit and counterparty risk capital assessment. This model is used throughout the firm, both at the parent level and for a number of individual Legal Entities, to identify distinctively the amount of capital required for Credit Risk and Concentration Risk. As per the model, Credit Risk Economic Capital is defined as the cushion against unexpected losses at a 99.9% confidence level based on maintaining a targeted "AA" rating standard for JPMorgan Chase & Co. The firm's economic capital model measures default losses, changes in accounting reserves and mark-to-market losses. To compute economic capital, the loss distribution for the wholesale credit portfolio is calculated by running Monte-Carlo simulations using J.P. Morgan's Proprietary Capital Model (PCM) with a one-year horizon.

Since 2017, the ECC model is run also for JPMBI and as at December 31st, 2016, the capital amount and the concentration risk add-on recommended by this model for CCR for JPMBI are lower than the ones calculated by the above models or requested by CBI (\$2mm). Hence the ECC model results have not been applied.

## Minimum capital requirement

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.

Own funds credit exposure class	JРМВІ
As at 31 December 2016	\$m
Central governments or central banks	-
Public sector entities	-
Multilateral Development Banks	-
Institutions	18
Corporates	2
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	1
Total Capital Requirements	21

Exhibit 5: Minimum Capital Requirements for Credit Risk (Banking Book) under the Standardised Approach

Own funds	JРМВІ
As at 31 December 2016	\$m
Position Risk	-
Commodities Risk	-
Foreign-Exchange Risk	0
Settlement Risk	-
Large Exposures	-
Operational Risk	18

Exhibit 6: Minimum capital requirement for market risk, settlement risk, large exposures and operational risk

## 5. Capital Planning Buffer

The ICAAP analyses JPMBI's capital adequacy at the assessment date and projected forward over a three-year planning horizon, including the effects of severe but plausible stress scenarios, to ensure that it maintains an appropriate Capital Planning Buffer over internal and external capital minimum standards.

The Capital Planning Buffer is described as the quantum of capital the Bank should hold now, to absorb losses and/or cover increased capital requirements in adverse circumstances that are outside of its normal and direct control. This buffer can be released/used in such stressed circumstances, allowing the Bank to continue to meet its minimum regulatory capital requirements.

In addition to Pillar 1, JPMBI adopted an internal approach to assess its capital adequacy under Pillar 2A. This involves using its Pillar 1 capital requirements as a starting point and then using its internal capital adequacy assessment to apply any Pillar 2A add-ons (to the Pillar 1 minimum) that are required to adequately capture the risks to which the Bank is exposed. The second component is known as "Pillar 2B", and considers what additional capital buffer is required to maintain that capitalization over the economic cycle, including a severe stress.

Based on the analysis undertaken, JPMBI's capital resources remain adequate to support the Bank's underlying risk profile and strategic growth objectives.

JPMBI maintains a substantial capital surplus throughout the scenarios considered. JPMBI's total capital ratio remains well above the required minimum level of 8% (excluding the Capital Conservation Buffer) at all times and under all scenarios.

Therefore, at this stage, the Bank believes that continuing to monitor the impact of the stress scenarios is the most appropriate course of action—since the impact is both within the capital currently available, and within the 2.5% of RWAs or greater which the firm must hold as an equivalent buffer under CRD IV (Capital Conservation Buffer). In addition, JPMBI capital forecasting is based on a combination of factors including potential new business, forecasted market conditions, forecasted business activity, etc.

Our conclusion based on the Risk Assessment and Quantification and the capital position analysis above is that JPMBI is adequately capitalized relative to the risks it is running, and relative to the projected business in JPMBI. This assessment will be kept under review as the business profile of JPMBI changes, and in any event at least annually.

# 6. Credit risk adjustments (Art. 442)

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

## Definition

Impairment loss: Amount by which the carrying amount of an asset or a cash-generating unit exceeds its recoverable amount (IAS 36).

Past due: A financial asset is past due when a counterparty has failed to make a payment when contractually due (IFRS 7).

## Credit risk adjustments for derivatives

JPMBI did not hold any derivatives for the period ended 31st December.

## Credit Risk Exposures before credit risk mitigation

Primary responsibility for determining impairment provisions is managed according to the Firm's Credit Policy. J.P. Morgan's methodology for determining impairment provisions and the establishment of impairment provisions are managed centrally.

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

EAD pre-CRM credit exposure class	JPMBI		
	Exposure Pre CRM	Average Exposure Pre CRM over the Year	
As at 31 Dec 16	\$m	\$m	
Central governments or central banks	267	257	
Regional governments or local authorities	-	-	
Multilateral development banks	-	-	
Institutions	1,084	1,461	
Corporates	35	48	
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	7	4	
Total Standardised Approach Credit Risk Exposure	1,392	1, 771	

Exhibit 7: Credit Risk Exposures before Credit Risk Mitigation (CRM) for JPMBI

# 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.

EAD pre-CRM credit exposure class				JPMBI			
	United Kingdom	Europe	United States	Africa	Asia	Rest of the world	Total
As at 31 Dec 16	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	-	267	-	-	-	-	267
Regional governments or local authorities	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-
Institutions	1,029	39	16	-	-	-	1,084
Corporates	3	25	5	-	-	1	35
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	-	7	-	-	-	-	7
Total Standardised Approach Credit Risk Exposure	1,032	337	21			1	1,392

Exhibit 8: Geographic analysis of credit exposure for JPMBI

# 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.

EAD pre-CRM credit exposure class			JPMBI		
	Banks	Non-Bank Financial Institutions	Non-Financial Corporations	Other	Total
As at 31 Dec 16	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	267	-	-	-	267
Regional governments or local authorities	-	-	-	-	-
Multilateral development banks	-	-	-	-	-
International organisations	-	-	-	-	-
Institutions	1,084	-	-	-	1,084
Corporates	-	35	-	-	35
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	-	-	-	7	7
Total Standardised Approach Credit Risk Exposure	1,350	35	-	7	1,392

Exhibit 9: Industry analysis of credit exposure for JPMBI

## 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 and obligation becomes due according to the existing terms of agreement.

EAD pre-CRM credit exposure class				JPMBI			
	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	Total
As at 31 Dec 16	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	267	-	-	-	-	-	267
Regional governments or local authorities	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-
Institutions	1,084	-	-	-	-	-	1,084
Corporates	35	-	-	-	-	-	35
Mortgages	-	-	-	-		-	-
Public sector entities Items belonging to regulatory high-risk categories (e.g. Private equity)	-	-	-	-	-	-	-
Short term claims on institutions and corporates	-	-	-	-	-	-	-
Other items	-	-	-	-	7	-	7
Total Standardised Approach Credit Risk Exposure	1,386	-	-	-	7	-	1,392

Exhibit 10: Residual maturity analysis of credit exposures for JPMBI

## Past due and impaired loan

JPMBI did not hold any past due and impaired loans for the period ended 31st December 2016.

# 7. Intra Group Financial Support Disclosure

JPMBI has not entered into any group financial support arrangements pursuant to Article 19 of Directive 2014/59/EU".

# 8. Unencumbered assets (Art. 443)

As at December 31, 2016 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 1.4 billion as at 31 December 2016.

# 9. 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>4</sup> to determine appropriate CQS for counterparties and securities. Exposures cannot 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>5</sup>.

						Institution			
Credit Quality	Fitch's	Moody's	S&P's	Corporate and CIUs			sessment thod	Sovereign	Securitisation (Standardised
Step	assessments	assessments	assessments and	anu cios	Sovereign method	Maturity	Maturity 3 months or less		Approach)
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%
		Caa1 and							
6	CCC+ and below	below	CCC+ and below	150%	150%	150%	150%	150%	1250%

Exhibit 11: Standardised approach: mapping of ECAIs' credit assessments to credit quality steps. Long term mapping

<sup>&</sup>lt;sup>4</sup> http://www.eba.europa.eu/documents/10180/16166/4+Ausust+2006 Mapping.pdf

<sup>&</sup>lt;sup>5</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

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%
			All short-term ratings		
4	Below F3	NP	below A-3	150%	1250%
5				150%	1250%
6				150%	1250%

Exhibit 12: Standardised approach: mapping of ECAIs' credit assessments to credit quality steps. Short term mapping

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 CRR6 are satisfied. Otherwise the issue exposure is treated as unrated.

JP Morgan applies risk weights as prescribed in the CRR7.

## 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.

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				JP	MBI			
	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)	Total
As at 31 Dec 16	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	-	-	-	-	-	-	267	267
Regional governments or local authorities	-	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-	-
Institutions	1,044	-	40	-	-	-	-	1,084
Corporates	-	-	35	-	-	-	-	35
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	-	-	7	-	-	-	-	7
Total Standardised Approach Credit Risk								
Exposure/Capital	1,044	-	81	-	-	-	267	1,392

Exhibit 13: Credit quality step analysis of Pre CRM exposure and capital deductions under the Standardised Approach for JPMBI

<sup>&</sup>lt;sup>6</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>&</sup>lt;sup>7</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

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				JPI	ИВI			
	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)	Total
As at 31 Dec 16	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Central governments or central banks	-	-	-	-	-	-	267	267
Regional governments or local authorities	-	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-	-
Institutions	1,049	-	40	-	-	-	-	1,088
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	-	-	7	-	-	-	-	7
Total Standardised Approach Credit Risk Exposure/ Capital								
	1, 049	-	77	-	-	-	267	1,392

Exhibit 14: Credit quality step analysis of Post -CRM exposure and capital deductions under the Standardised Approach for JPMBI

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

#### Definition

Market risk is the exposure to an adverse change in the market value of financial instruments caused by a change in market parameters. The primary categories of market parameters are Interest Rates, Foreign Exchange Rates, Equity Prices, Credit Spreads and Commodity Prices.

Market risk management, part of an independent risk management function, is responsible for monitoring market risks throughout the Firm and defines market risk policies and procedures. The Market Risk function reports to the Firm's CRO.

The Firmwide Risk Executive (FRE) Market Risk and Line of Business (LOB) Chief Risk Officers (CROs) are responsible for managing firmwide market risk. The LOB Market Risk functions are responsible for establishing methodologies and procedures to measure, monitor and control market risk, using information provided by the Firm's risk infrastructure. The JPMBI Chief Risk Officer (CRO) is responsible for application of these processes to JPMBI.

#### **Business Overview**

JPMBI has market risk limits in place at the legal entity level to control its market risk exposure.

## Market Risk Management

Market risk limits are employed as the primary second line of defence control. Business units should not exceed their limits unless authorized by a Temporary Limit Approval (TLA) or limit change.

The LOB Market Risk (MR) and JPMBI CRO establish JPMBI level limits. Business Heads, MR and JPMBI CRO are signatories to limits. Limits require formal approval by appropriate limit signatories. Any subsequent revised limits or TLAs must be signed-off by appropriate limit signatories to be effective.

As part of its holistic analysis of the JPMBI's market risk, LOB MR reviews market risk limits for JPMBI at least semi-annually. Limit reviews appropriately consider the underlying trading, investing and hedging strategies of the business.

#### Market Risk Quantification

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.

As of December 31, 2016, Pillar 1 foreign exchange risk is below the reporting threshold of 2% of regulatory capital. However, capital has been allocated against foreign exchange risk.

	2016				
Market Risk	Minimum Capital	RWA			
	\$m	\$m			
<b>ЈРМВ</b> І					
CAD 1 Model based PRR	-	-			
Interest rate PRR	-	-			
Equity PRR	-	-			
Option PRR	-	-			
Collective investment schemes PRR	-	-			
Commodity PRR	-	-			
Foreign exchange PRR	0	4			
Total Market Risk Capital Requirement	0	4			

Exhibit 15: Minimum capital requirement for market risk

## 11. Operational Risk (Art. 446)

#### Definition

Operational risk is the risk of loss resulting from inadequate or failed processes or systems, human factors 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, inappropriate employee behavior, 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 damages 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, and the markets and regulatory environments in which it operates.

To monitor and control operational risk, the Firm has an Operational Risk Management Framework ("ORMF") which is designed to enable the Firm to maintain a sound and well-controlled operational environment. The ORMF is comprised of four main components: Governance, Risk Assessment, Measurement, and Monitoring and Reporting.

#### Governance

The lines of business and corporate functions are responsible for owning and managing their operational risks. The Firmwide Oversight and Control Group, which consists of control officers within each line of business and corporate function, is responsible for the day-to-day execution of the ORMF. Line of business and corporate function control committees oversee the operational risk and control environments of their respective businesses and functions. These committees escalate operational risk issues to the Firmwide Control Committee ("FCC"), as appropriate. The Firmwide Risk Executive for Operational Risk Governance ("ORG"), a direct report to the Chief Risk Officer ("CRO"), is responsible for defining the ORMF and establishing minimum standards for its execution. Operational Risk Officers report to both the line of business CROs and to the Firmwide Risk Executive for ORG, and are independent of the respective businesses or corporate functions they oversee.

The Firm's Operational Risk Governance Policy is approved by the Directors' Risk Policy Committee ("DRPC"). This policy establishes the Operational Risk Management Framework for the Firm. The assessments of operational risk using this framework are reviewed with the DRPC.

#### Risk Assessment

The Firm utilizes several tools to identify, assess, mitigate and manage its operational risk. One such tool is the RCSA program which is executed by LOBs and corporate functions in accordance with the minimum standards established by ORG. As part of the RCSA program, lines of business and corporate functions identify key operational risks inherent in their activities, evaluate the effectiveness of relevant controls in place to mitigate identified risks, and define actions to reduce residual risk. Action plans are developed for identified control issues and businesses are held accountable for tracking and resolving issues in a timely manner. Operational Risk Officers independently challenge the execution of the RCSA program and evaluate the appropriateness of the residual risk results. In addition to the RCSA program, the Firm tracks and monitors events that have or could lead to actual operational risk losses, including litigation-related events. Responsible businesses and corporate functions analyse their losses to evaluate the efficacy of their control environment to assess where controls have failed, and to determine where targeted remediation efforts may be required. Operational Risk Governance (ORG) provides oversight of these activities and may also perform independent assessments of significant operational risk events and areas of concentrated or emerging risk.

#### Measurement

For information related to operational risk measurement refer to Section 4 Capital Requirements.

## Pillar 1

The Pillar 1 assessment of Operational risk is calculated in accordance with the Basel 3 Basic Indicator Approach (BIA).

The following tables detail the operational risk RWAs reported in 2016 (Table 1) split by the method used to calculate operational risk capital requirement for each entity.

Calculation Method	JPMBI \$m
Basic Indicator Approach	224
Fixed Overhead Requirement	-
TOTAL RWA	224

Exhibit 16: Risk weighted assets for operational risk in 2016

## 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.

## Monitoring and Reporting

ORG has established standards for consistent operational risk reporting. The standards also reinforce escalation protocols to senior management and to the Board of Directors. Operational risk reports are produced on a Firmwide basis as well as by line of business and corporate function.

12. Exposure to interest rate risk on positions not included in the trading book (Art.

448)

### Definition

Interest Rate Risk in the Banking Book (IRRBB) is defined as interest rate risk resulting from the firm's traditional banking activities (accrual accounted on and off-balance sheet positions), which includes extension of loans and credit facilities, taking deposits and issuing debt (collectively referred to as 'non-trading' activities), and also the impact from Treasury & Chief Investment Office (TCIO) investment portfolio and other related Treasury and CIO activities. IRR from non-trading activities can occur due to a variety of factors, including but not limited to:

- Difference in the timing of re-pricing of assets, liabilities and off-balance sheet instruments;
- Differences in the balances of assets, liabilities and off-balance sheet instruments that re-price at the same time;
- Differences in the amounts by which short-term and long-term market interest rates change;
- Impact of changes in the duration of various assets, liabilities or off-balance sheet instruments as interest rates change.

## Oversight and Governance

Governance for Firmwide IRR is defined in the IRR Management Policy which is approved by DRPC. The CIO, Treasury and Other Corporate Risk Committee ("CTC RC") is the governing committee with respect to IRRBB.

- Reviews the IRR Management policy;
- 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 to CTC RC, IRR exposures and significant model and/or model assumptions changes are reviewed by the Asset and Liability Committee ("ALCO"). The ALCO provides a framework for overseeing the IRR of LOBs, foreign jurisdictions and key legal entities to appropriate LOB ALCOs, Country ALCOs and other local governance bodies.

The CTC RC also governs the IRR Management Group; an independent dedicated Risk Group within CTC and reports into the CTC Chief Risk Officer. IRR Management is responsible for, but not limited to, the following:

- Creating governance over IRR assumptions and parameter selection/calibration; and
- Identifying and monitoring IRR and establishing limits as appropriate.

## Risk Identification and Measurement

TCIO manages IRRBB exposure on behalf of the firm by identifying, measuring, modelling and monitoring IRR across the firm's balance sheet. TCIO identifies and understands material balance sheet impacts of new initiatives and products and executes market transactions to manage IRR through TCIO investment portfolio's positions. Execution by TCIO will be based on parameters established by senior management, per the TCIO Investment Policy. In certain Legal entities, Treasury manages IRR in partnership with TCIO. Lines of businesses are responsible for developing and reviewing specific LOB IRR modelling assumptions.

Measures to manage IRR include:

#### Earnings-at-Risk (EaR)

Primary measure used to gauge the firm's shorter term IRR exposure which measures the sensitivity of pre-tax income to changes in interest rates over rolling 12 months compared to base scenario (Level 1 Market Risk limit applied).

#### Economic Value Sensitivity (EVS)

EVS is an additional Firmwide metric utilized to determine changes in asset/liability values due to changes in interest rates.

## Sensitivity of the Banking Book to interest rate changes

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.

The impact of 200bps parallel rates increase and decrease on the economic value (EVS) of JPMBI has been estimated as at December 31, 2016; the results are in the tables below:

Scenario	EVS (US\$m)
+200bps	20
-200bps	-20

Exhibit 17: Sensitivity of the Banking Book to interest rate changes

# 13. 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.

# 14. Remuneration policy (Art. 450)

## Background

This section sets out the remuneration disclosures required under Article 450 CRR in relation to JPMBI, and in respect of the performance year ending 31 December 2016.

JPMBI is part of the J.P. Morgan Chase & Co group of companies. In this section, the terms "J.P. Morgan" or "Firm" refers to the J.P. Morgan Chase & Co. group of companies, and each of the entities in that group globally, unless otherwise specified.

This section sets out general principles. Details of specific remuneration programmes are set forth in the relevant plan terms and conditions as in force from time to time.

## Qualitative disclosures

As part of the Firm, JPMBI applies J.P. Morgan's global compensation philosophy and pay practices. The qualitative remuneration disclosures required under Paragraphs 1(a) – (f) of Article 450 CRR for all employees of the Firm's businesses located in EMEA, including staff of JPMBI, is available in the most recent EMEA Remuneration Policy Disclosure at:

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

#### Quantitative disclosures

Having regard to JPMBI's size, internal organisation, and the nature, scope and complexity of its activities, JPMBI has determined that it will not make any quantitative disclosures in this report. In all cases, the information is available to the Regulator on request.

# 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 deleveraging 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.

CRR L	CRR Leverage Ratio  Table LRCom: Leverage ratio common disclosure	
Table I		
	On-balance sheet exposures (excl. derivatives and SFTs)	
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	1,392
2	(Asset amounts deducted in determining Tier 1 capital)	(1)
3	Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)	-
	Derivative exposures	1,392
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	Total derivative exposures (sum of lines 4 to 10)	_

	Securities financing transaction exposures			
12	Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	-		
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-		
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	Total securities financing transaction exposures (sum of lines 12 to 15a)	-		
	Other off-balance sheet exposures			
17	Off-balance sheet exposures at gross notional amount	-		
18	(Adjustments for conversion to credit equivalent amounts)	-		
19	Other off-balance sheet exposures (sum of lines 17 to 18)			
	Exempted exposures in accordance with CRR Article 429 (7) and (14) (on and off balance sheet)			
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))	-		
	Capital and Total Exposure			
20	Tier 1 capital	404		
21	Total leverage ratio exposures (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	-		
	Leverage ratio			
22	Leverage ratio	29.01%		
	Choice on transitional arrangements and amount of derecognised fiduciary items			
EU-23	Choice on transitional arrangements for the definition of the capital measure	Fully phased-in		
EU-24	Amount of derecognised fiduciary items in accordance with Article 429(11) of Regulation (EU) NO 575/2013	-		

Exhibit 18: Leverage ratio common disclosure

# 16. Use of Credit Risk Mitigation techniques (Art. 453)

As part of its management of credit exposures, the firm actively engages in credit risk mitigation techniques to reduce the amount of credit risk it is taking, to spread the concentration of risk across its portfolio and ultimately to ensure capital efficiency in compliance with the applicable regulations. This is carried out for JPMBI through accepting pledges over custody assets and receiving a guarantee from the parent company JPMCB N.A., London Branch. In specific, JPMBI custody clients - apart from Trustee clients - have signed a standard JPMBI Global Custody Agreement ('GCA'). This Agreement contains – in addition to rights of set off over cash balances (this excludes Pension Fund, Insurance and other clients) – a lien with right of sale over the clients' assets which JPMBI would exercise to repay any outstanding amounts in the event of client overdraft default In addition, for clients where JPMBI has no legal rights to access their assets in the event of default, for the purposes of Large Exposure mitigation rules, JPMBI can use a standby letter of credit to the value of \$300m, issued by JPMCB N.A., London Branch.

# 17. Disclosures not applicable to JPMBI for the period ending 31 December 2016

The following Articles of CRR are not applicable as at December 31, 2016:

- Exposure to counterparty credit risk (Art. 439)
- Capital buffers (Art. 440)
- Indicators of global systemic importance (Art. 441)
- Credit risk adjustments (Art. 442)
- Unencumbered assets (Art. 443)
- Exposure to Securitisation Positions (Art. 449)
- Use of the IRB Approach to credit risk (Art. 452)
- Use of the Advanced Measurement Approaches to operational risk (Art. 454)
- Use of Internal Market Risk Models (Art. 455)