MUFG Securities EMEA plc Consolidated Pillar 3 Disclosure

31ST DECEMBER 2019

MUFG Securities EMEA plc
A member of MUFG, a global financial group

MUFG

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1. About MUFG Securities EMEA plc

MUFG Securities EMEA plc ("The Group") is a wholly-owned investment banking subsidiary of Mitsubishi UFJ Securities Holdings Co. Ltd. ("MUSHD"), which is wholly owned by Mitsubishi UFJ Financial Group ("MUFG") and was established in 1983. The Group's Tier 1 capital at 31 December 2019 was £1,894 million and the average number of employees during the year was 695.

MUFG was formed in October 2005 through the merger of Mitsubishi Tokyo Financial Group and UFJ Holdings and is one of the world's largest and most diversified financial groups, with total assets of ¥314 trillion (£2.2 trillion) at 31 December 2019. MUFG's services include commercial banking, trust banking, investment banking, credit cards, consumer finance, asset management, leasing and other financial service activities.

The Group actively trades in fixed income, equity and structured finance products, providing client solutions across primary and secondary markets. The client group includes financial institutions, corporations and central banks. The Group primarily supports this client group from its base in London and additionally operates a branch in the Dubai International Financial Centre.

The Group works in close partnership with MUFG and its corporate bank, MUFG Bank, Ltd. ("MUFG Bank"), to ensure its clients experience seamless product delivery that meets all of their objectives.

Following the UK Referendum on EU Membership ("Brexit"), The Group established a wholly owned subsidiary in The Netherlands, namely MUFG Securities (Europe) N.V. ("MUS(EU)"), as well as a branch of that entity in Paris, to support the continued servicing of clients across Europe.

MUS(EU) was granted a MiFID II Investment Firm Licence in The Netherlands in December 2018 and commenced trading in March 2019. The scope of this document covers MUFG Securities EMEA plc and MUS(EU) on a consolidated basis.

2. Introduction

The Basel II Framework was implemented in the European Union via the Capital Requirements Directive ("CRD") in June 2006. The framework is made up of three pillars:

- Pillar 1 (Minimum capital requirements)
  Pillar 1 sets out 'minimum capital requirements'. It covers the calculation of risk weighted assets ("RWA") and the capital resources requirements for credit risk, market risk and operational risk. Credit risk includes counterparty credit risk and concentration risk.

- Pillar 2 (Supervisory review process)
  Pillar 2 capital framework is intended to ensure that firms have adequate capital to support the relevant risks in their business, and that they have appropriate processes to ensure compliance with CRD IV. It considers whether additional capital is required over and above the Pillar 1 capital requirements. A firm's internal capital adequacy assessment process ("ICAAP") supports this process.

- Pillar 3 (Market discipline)
  Pillar 3 of the Basel framework aims to promote market discipline through regulatory disclosure requirements. It covers external disclosures of capital and risk exposures to increase transparency and improve comparability and consistency of disclosures.

The Basel Committee agreed updates to the Basel framework in July 2009, commonly referred to as Basel 2.5. These seek to better capture risk from securitisation and trading book exposures and were incorporated into European law via amendments to the CRD known as the "Third Capital Requirements Directive" or "CRD III".

Basel III, released in December 2010, builds on Basel 2.5. It sets higher capital and liquidity requirements to be phased in over the coming years. In the EU, Basel III was implemented through the Capital Requirements Regulation ("CRR") and Fourth Capital Requirements Directive ("CRD IV") in January 2014. The UK Prudential Regulation Authority ("PRA") published final rules for implementing CRD IV in its Policy Statement 7/13. Reporting and Disclosure requirements are covered in the Policy Statement.

In February 2019, the Council of the EU endorsed an agreement on a set of revised rules aimed at reducing risks in the EU banking sector. The package agreed by the Council and the Parliament comprises two regulations and two directives, relating to:

- Bank capital requirements (amendments to regulation 575/2013 and directive 2013/36/EU);
- The recovery and resolution of banks in difficulty (amendments to directive 2014/59/EU and regulation 806/2014).

The amendments in the package above to the existing CRR and CRD IV (collectively referred to as "CRR2") include the following:

- A binding leverage ratio ("LR") and changes to the exposure measure
- A binding detailed net stable funding ratio ("NSFR")
- A new Standardised Approach for counterparty credit risk
- Changes to the rules for determining the trading and non-trading book boundary and the methodologies for calculating market risk capital charges

The CRR2 changes were finalised in 2019 and will apply from 28th June 2021 though certain elements have a slightly different timeframe. These changes will need to be considered alongside the implications arising from the UK leaving the European Union. The Group is monitoring and preparing for these changes to ensure any upcoming regulatory requirements are met.

The Pillar 3 disclosures are prepared in accordance with the CRR and CRD IV as well as the European Banking Authority ("EBA") guidelines (EBA/GL/2016/11) on disclosure requirements issued in December 2016. The disclosures are available on the Group's corporate website (www.mufgemea.com). Disclosure in respect of remuneration as required under Article 450 of the CRR is separately published on the same website and forms part of the Pillar 3 disclosure for the Group.

The Pillar 3 disclosures were verified and approved internally, including a review by the Board of Directors to ensure that the external disclosures convey the Group's capital and risk profile comprehensively, subject to materiality and proprietary confidentiality. There is no requirement for external auditing of these disclosures.

3. Regulatory Approach

The Group is regulated by the UK PRA and Financial Conduct Authority (“FCA”) and is subject to minimum capital adequacy standards. The Group calculates appropriate capital requirements for each of its material risks.

METHODOLOGIES FOR CAPITAL CALCULATIONS

Pillar 1 Credit Risk

The Group’s credit risk requirement is measured under the Standardised Approach in accordance with Title 2 of Part Three within CRR.

Pillar 1 Market Risk

The calculation of the Group’s market risk capital requirements is primarily based on its internal Value at Risk (“VaR”) model which has been approved by the PRA. Market risk capital requirements for a small number of positions are calculated using the Standardised Approach.

Pillar 1 Operational Risk

The Group calculates its operational risk using the Standardised Approach in accordance with Title 3 of Part Three within CRR.

Basis of consolidation

In this disclosure, the Group is presented on a consolidated basis and there is no difference between the financial accounting consolidation and the regulatory consolidation used for regulatory reporting purposes.

4. Risk Management Structure

COMMITTEE AND CORPORATE STRUCTURE

The Group has a strong risk management culture with principles, processes and frameworks to identify, measure and manage its risks and capital effectively.

Board

Responsibility for the oversight of risk management resides with the Board, with support from the Board Risk Committee ("BRC"). As part of the Group's business strategy, the Board considers the risks to which the Group is exposed, and specifies an appetite and management strategy for each of these risks. The primary financial, operational and reputational risks are defined and discussed in further detail in the following sections.

The Board has approved an enterprise-wide risk management framework for the Group which describes the Group's approach to risk appetite, strategy, governance, reporting and controls to ensure that risks taken are appropriately measured, monitored, reported, controlled and limited to the confines of the Group's risk appetite. The Board is ultimately responsible for reviewing the adequacy of the enterprise-wide risk management framework. The Directors consider that the framework currently in place is adequate.

Board Risk Committee

The objective of the BRC is to exercise oversight on behalf of the Board over the top and emerging risks facing the Group and to review and make recommendations to the Board on the Group's risk appetite and risk strategy, risk management framework (incorporating principles, policies, methodologies, systems, processes, procedures and people), and risk culture to ensure that it supports the Group's risk appetite.

As at 31 December 2019, the BRC comprised of the Independent Non-Executive Directors, including the Chair of the Board. The BRC is supported by the regular attendance of the Chief Risk Officer ("CRO").

Remuneration Committee

The objective of the Remuneration Committee is to assist the Board of Directors to exercise independent judgement in approving remuneration proposals and recommending a remuneration policy to the Board on an annual basis. The Committee shall make decisions which are consistent with the Group's current and future financial status.

Nomination Committee

The objective of the Nomination Committee is to advise the Board of Directors on the criteria for and selection of new directors. It shall keep the composition of the Board under review, including maintaining succession plans, and lead the appointment process for nominations to the Board.

Audit Committee

The objective of the Audit Committee is to assist the Board of Directors in its oversight of (i) the integrity of the Group's financial statements and other financial information provided by the Group to its shareholders, creditors, regulators or other third parties; (ii) the Group's internal controls and risk management systems; (iii) the performance of the Group's internal and external auditors and (iv) the Group's auditing, accounting and financial reporting processes generally. The Committee is responsible, among other matters, for determining whether the Group's internal controls over financial reporting are appropriate to the risks they are designed to monitor.

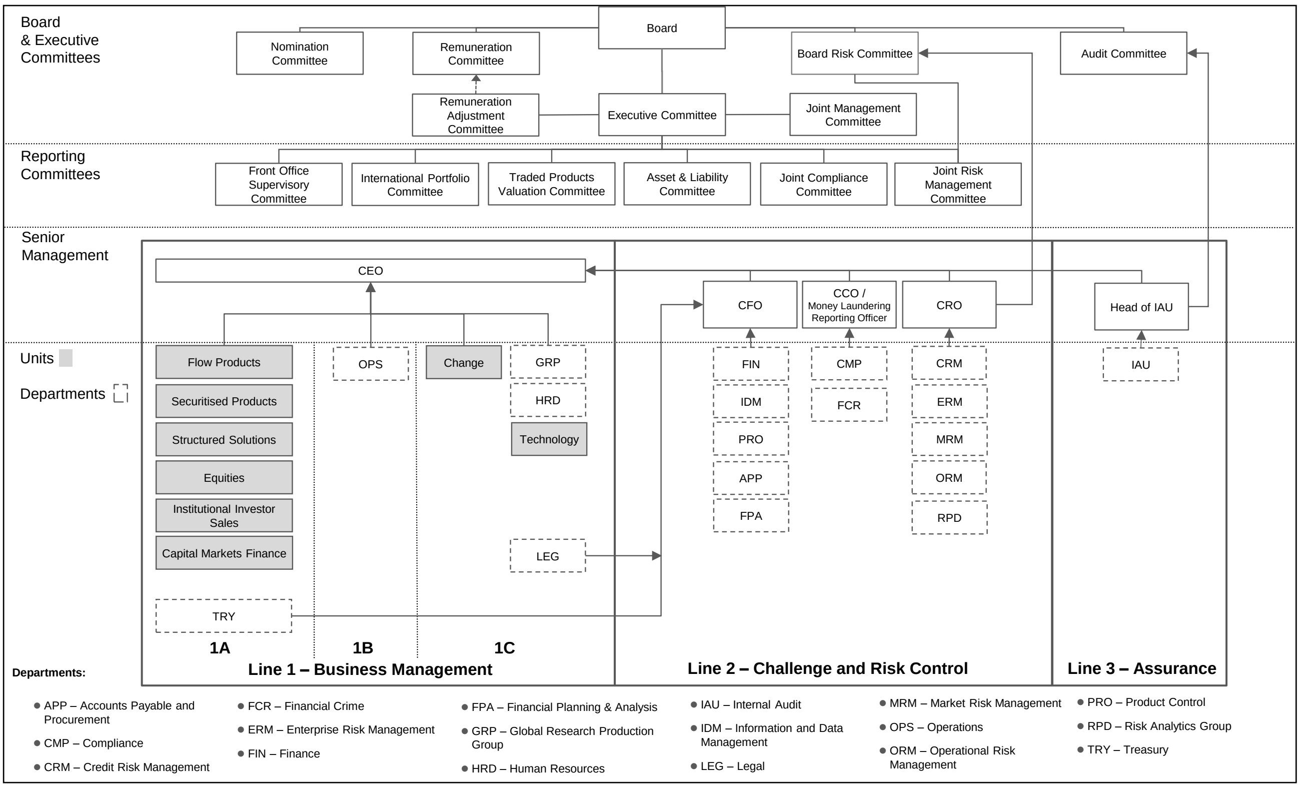
Risk structure and other committees

Day-to-day risk management is the responsibility of all employees of the Group. Accountability for second line risk management, with the exception of compliance and conduct risk, resides with the CRO, who reports directly to the Chief Executive Officer ("CEO") and the BRC. Market, credit, operational, model and reputational risk are overseen by the Joint Risk Management Committee ("JRMC") supported by its underlying sub-committees.

Valuation risk is overseen by the Traded Products Valuation Committee ("TPVC"). Liquidity and capital risk is overseen by the Asset and Liability Committee ("ALCO"), which is chaired by the Chief Financial Officer ("CFO"). Compliance, conduct and legal risk are overseen by the Joint Compliance Committee ("JCC"). Second line risk management of compliance risk and conduct risk resides with Chief Compliance Officer ("CCO"), who reports directly to the CEO.

Each of these executive sub-committees reports to the Executive Committee, which reports directly to the Board. In addition, the JRMC reports to the BRC, via the CRO.

The Group's risk committee and corporate structure as at 31st December 2019 is illustrated below:



THREE LINES OF DEFENCE

The Group's governance of risk is based on the "Three Lines of Defence" approach:

Line 1 – Business Management – Front Office and functional support departments

Department Heads and all Front Office staff are responsible for:

- Managing the risks inherent in their business activities
- Supervision, ensuring competence and training of their staff
- Escalating risk issues to the Executive Committee, Joint Management Committee, JRMC, and ALCO.

Line 2 – Challenge and Risk Control – Risk Departments, Compliance and other control support departments

- Independent of Front Office, led by the CRO, CFO and the CCO
- Enable the Group to maintain a system of checks and balances
- Escalate risk issues to the JRMC, TPVC, ALCO and where appropriate to the Executive Committee
- The Risk function and the JRMC have a reporting line to the BRC, independent of the CEO.

Line 3 – Assurance – Internal Audit

- Assurance role carried out by Internal Audit
- Independent opinion to Senior Management and the Audit Committee of the Board
- Objective appraisal of the adequacy and effectiveness of the internal control systems designed and installed by Senior Management and their remediation
- Reports to Senior Management on whether the control systems are fulfilling, or are likely to fulfil, the control objectives of the Group
- Independent reporting line to the Chair of the Audit Committee of the Board.

SENIOR MANAGEMENT

Board members as of 31 December 2019 are listed in the table below.

Table 1: Board Members

William Fall Chairman/ Independent Non-Executive Director	Mr. Fall has been a director since 2015, during which time he was the Senior Independent Director and Chair of the Board Risk Committee and became the Chairman of the Board in October 2015. His most recent role was Co-Head of the Institutional Bank, at Royal Bank of Scotland. Prior to this, Mr Fall was the CEO, International, at Bank of America. He has also held senior positions at Kleinwort Benson, Westpac Banking Corporation and Straumur-Burdaras and also sits on several charitable Boards. He is a non-executive director for Ambac (UK) Ltd, a wholly-owned subsidiary of Ambac Financial group, a NYSE-listed US company and is expected to become Chairman in March 2020.
Eileen Taylor Independent Non-Executive Director	Ms. Taylor has been a director since 2019; She is a seasoned investment banker with 38 years of experience in global leadership roles based in the UK, US and Asia. Ms. Taylor has strong working knowledge of Supervisory Review and Evaluation Process, non-financial risk, recovery and resolution planning and corporate governance. She has previously served as Chief Executive Officer of Deutsche Bank's UK bank, with significant regulatory interaction. Ms Taylor brings experience of managing large, global transformation programmes, as well as significant experience of designing and implementing strategy and running front to back business processes. Ms Taylor is an experienced operational, market and credit risk manager through various Risk and CEO roles. She is a Non-executive director of NHS East London Foundation Trust.
Stephen Jack Independent Non-Executive Director	Mr. Jack has been a director since September 2015 and is Chair of the Audit Committee. He is a Chartered Accountant who has held senior management positions in a number of international investment banking and broking organisations including being Global CFO of ING Barings, Group Finance Director of Collins Stewart Tullett plc and Group CFO of Compagnie Financiere Tradition SA. As a Non-Executive director he has gained experience across other sectors. He is currently Vice Chair of Anchor Hanover Group, England's largest not for profit provider of care and housing for older people, and Vice chair of the Cambridge Building Society. In May 2014 he also became a trustee of the Royal Mencap Society and in January 2014 was awarded an OBE for services to disabled people. In December 2016, he became a trustee of Golden Lane Housing.
Gordon Sangster Independent Non-Executive Director	Mr Sangster has been a Director since September 2017 and is Chair of the Board Risk Committee. Prior to joining MUSE Mr Sangster was International Treasurer at Bank of America NA and prior to this appointment held a number of positions in Bank of America NA in both the Corporate Bank and Finance in a career spanning 35 years. In addition Mr Sangster has held a number of INED appointments which included CLS both as a Board member and Chair of the Audit Committee. Mr Sangster has an

	honours degree in Physics from Edinburgh University and is FCCA, ACMA and ACIS qualified.
Masamichi Yasuda Group Non-Executive Director	Mr. Yasuda has been a director since 2014. He is the Senior Managing Executive Officer and Global Head of Sales and Trading for Mitsubishi UFJ Securities Holding Co., Ltd. He is a member of the Board of Directors and Deputy President as well as the CEO of the Global Markets Business for Mitsubishi UFJ Morgan Stanley Securities Co., Ltd. Since joining the Bank in 1983, he held a variety of positions in the Global Markets, Global Corporates, Finance and Risk Management areas. Mr Yasuda holds a bachelor's degree in law from the University of Hitotsubashi.
Takanori Sazaki Group Non-Executive Director	Mr. Sazaki has been a director to the Group since 2019. He has held a number of positions gaining extensive global banking experience including 10 years of experience in Investment Banking and 7 years of experience in Strategic Planning in Tokyo, New York, Bangkok and London. He is currently the Regional Executive for Europe, Middle East and Africa assuming responsibility for the overall leadership of the MUFG Bank in the EMEA region.
Yasutaka Suehiro Group Non-Executive Director	Mr. Suehiro was an Executive Director of the Group between 2007-2012 and was appointed Non-Executive Director in 2018. He is currently Deputy Chief Operational Officer – International of Mitsubishi UFJ Securities Holdings Co., Ltd. He has been working for MUFG's international securities business in London, New York, and Hong Kong for more than 20 years. His most recent role was the CEO of MUFG Securities (Asia).
John Winter Executive Director	Mr. Winter joined the Group as Chief Executive Officer and Head of MUFG Bank's EMEA Global Corporate Investment Banking in April 2019. He was appointed to Head of London Branch for MUFG Bank in May 2019 and to Executive Officer in June 2019. Mr Winter has over 30 years of experience in financial services, including senior roles at some of the world's largest banks including Barclays, Deutsche and Merrill Lynch. Prior to joining MUFG in 2019, Mr Winter was CEO for Barclays Corporate Banking business for six years, having already spent eight years at the organisation as Head of its European Investment Banking and Debt Capital Markets business for EMEA. Mr Winter is also a trustee for Richard House Children's Hospice.
Chris Kyle Executive Director	Mr. Kyle has been a director since 2014. He is currently Chief Financial Officer at the Group and the London branch of MUFG Bank, having experience in various senior roles such as CFO and Chief Operating Officer of the Global Banking & Markets Division at RBS, Barclays, and Dresdner Kleinwort Benson. He is a Qualified Accountant.
Nicola Wickes Chief Risk Officer	Nicola Wickes has over 30 years of experience working with the financial sector, largely in the risk environment. She joined MUFG in 2019, where previously she held the position of Board Director of CIBC World Markets plc. and CRO for CIBC in Europe, Asia and Australia. She currently holds a Non-Executive Directorship at the Global Risk Institution in Toronto, Canada, and has worked extensively across all risk disciplines, specialising in Credit Risk at CIBC, UBS and Mellon Bank.

Diversity

Inclusion & Diversity continues to be a key area of focus for the Group.

Over the past 12 months, the Group has continued to work towards its external commitments under the HM Treasury Women in Finance Charter. As of July 2019, MUFG has increased the proportion of female Managing Directors to 15%. The Group continues to focus on its gender strategy which has also been put in place to support senior leaders with the Inclusion & Diversity plans they are required to make for their business units.

In addition to gender, key strategies for 2019 have included Agile & Flexible working and Mental Health Awareness and wellbeing. MUFG now has 48 trained Mental Health First Aiders throughout its London offices that are trained and accredited in pointing employees to various available resources both within

MUFG and beyond. An Agile Working Strategy is in place to ensure MUFG is competitive with its peers in the market. This is essential to enhancing MUFG's brand, by having the agile working offering that is necessary to attract and retain talented employees.

The above strategies are embedded into senior management's Inclusion & Diversity objective to ensure the Group's leaders are held accountable to creating and shaping a culture of inclusion.
A new mandatory training for all UK employees has been launched focusing on "Equality at MUFG". The training has been designed to enable employees to understand the importance of MUFG championing a fair and inclusive culture that provides equal opportunities for all and to support employees in being able to recognise discrimination and what to do about it.

The five employee networks which are active across the EMEA region continue to focus on raising awareness. These are: Family Matters (all aspects of family, including carers), Pride Alliance (LGBT & Allies), Mosaic (Multiculturalism), Balance (Gender Diversity) and disABILITY WORKS (Disability, including Mental Health). A total of 55 network events have been held throughout EMEA during 2019.

Risk appetite

Central to the Group's risk management is a clear risk appetite, consistent with its business profile and plans, as well as a strong and independent review and challenge structure. This facilitates optimisation of risk/return and assists Senior Management to effectively control and coordinate risk taking across the business. The Group's risk appetite is specified by the Board through a number of metrics including capital, liquidity, earnings volatility, market, operational and credit risk. It is reviewed at regular meetings of the Board and recalibrated annually as part of the Group's budget and planning process. The risk appetite is cascaded through the Group via the allocation of limits to front office departments and individual traders.

Risk limits impose an upper constraint on the level of exposure to a particular factor or a combination of factors. Limits are imposed to express the Board and Senior Management's appetite for certain risk types and to facilitate prudent allocation of such risk appetite to individual risk takers or group of risk takers, taking client needs and revenue targets into consideration. These are set at the Group, business unit, department, and trader level and risk limits are monitored daily.

The establishment of the risk appetite is largely a top down process and is supplemented and reinforced by a bottom up approach to risk identification, the results of which are maintained in the Group's risk register.

The Group establishes and is subject to risk management policies. These policies formalise the behaviours and standards expected in support of the risk culture. Policies are established across each primary risk type to formalise the processes by which business activities should fall within the appetite for each risk. Additionally, risk policies are established to ensure quality of risk measurement, risk monitoring, and appropriate avenues for escalation to occur.

The Group has established formal processes governing new activities (i.e. new business, complex transactions and new product mandates) which support the identification of any additional risk to the Group, and ensure that the risks related to the proposal are within the risk appetite of the Group and has the support of the Group's risk management functions.

Risk monitoring

The Chief Risk Officer has risk reporting lines from relevant support business functions to aid identification of risks. Risks and issues are escalated to JRMC and the Executive Committee. The BRC has delegated responsibility from the Board for independent oversight, review and challenge of the Group's risk profile against the agreed risk appetite under both normal and stressed conditions.

The risk profile is monitored and reported at the Executive Committee and JRMC as well as to the Board and BRC and is escalated outside the regular meeting framework if daily monitoring reveals any issues.

New products and complex transactions

The Group subjects all new business and complex transactions to the scrutiny of the New Business and Complex Transaction Committee, which reports to the JRMC and provides updates to the Board and BRC. The New Business and Complex Transaction Committee is comprised of representatives from all the relevant support functions. All new products go through the New Products Approval process which identifies the risks of the proposed product and considers the range of mitigation techniques, including hedging. Once all issues are resolved, the new products are approved by the CRO.

Complex transactions are subject to a similar approval process as new products. The CRO is responsible for determining whether any complex transaction is within the Group's risk appetite and the final approval of all complex transactions.

Stress testing

The Group has a stress testing framework that includes scenario stress testing (comprising macroeconomic and event stress testing based upon forward looking, historical and reverse stress testing), as well as single risk factor stress tests (which are designed to identify and quantify risk concentrations to particular risk factors). Results of stress testing are calculated at the Group level and also by department and business line, and reported regularly to Senior Management.

The Group undertakes stress testing across each of its businesses using stressed market moves across the market risk factors of relevance for each of those businesses.

Leverage ratio

The Group assesses the leverage ratio to mitigate the risk of excessive leverage. The Group performs regular analysis of the leverage ratio to understand drivers and sensitivities. The Group's leverage ratio exposure measure is mainly driven by securities financing transactions, derivatives and inventory which includes mainly trading securities and available-for-sale securities. In addition, Tier 1 capital resources and any applicable deductions impact on the leverage ratio. Leverage ratio is reported to the ALCO and BRC.

At present the Group is not subject to a binding regulatory minimum leverage ratio requirement. ALCO monitors the leverage ratio against the expected level and timing of a regulatory minimum to ensure action plans are in place to meet this regulatory minimum. In addition, balance sheet limits are in place for key exposure types which mitigate significant increase in leverage ratio exposure measure.

The disclosure of the leverage ratio below is based on the end point CRR definition of Tier 1 capital and the CRR definition of leverage exposure. The Group's leverage ratio is not affected by the exemption of qualifying central bank claims. Hence, there is no difference between the UK leverage ratio and the CRR leverage ratio.

Disclosures on the leverage ratio follow the EBA disclosure templates are presented below.

Table 2: Summary Reconciliation of Accounting Assets and Leverage Ratio Exposures

		At 31 Dec 2019	At 31 Dec 2018
		£m	£m
1	Total assets as per published financial statements	72,443	60,919
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-	-
3	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio exposure measure in accordance with Article 429(13) of Regulation (EU) No 575/2013 "CRR")	-	-
4	Adjustments for derivative financial instruments	(6,133)	(6,307)
5	Adjustments for securities financing transactions "SFTs"	2,241	1,305
6	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	201	127
EU-6a	(Adjustment for intragroup exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (7) of Regulation (EU) No 575/2013)	-	-
EU-6b	(Adjustment for exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (14) of Regulation (EU) No 575/2013)	-	-
7	Other adjustments	(564)	(153)
8	**Total leverage ratio exposure**	68,188	55,891

Table 3: Leverage Ratio Common Disclosure

CRR Leverage Ratio Exposures		At 31 Dec 2019 £m	At 31 Dec 2018 £m
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	16,462	12,509
2	(Asset amounts deducted in determining Tier 1 capital)	(147)	(146)
3	Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)	16,315	12,363
Derivative exposures			
4	Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	494	197
5	Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)	9,908	9,843
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	2,212	2,550
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(2,059)	(2,480)
8	(Exempted CCP leg of client-cleared trade exposures)	-	-
9	Adjusted effective notional amount of written credit derivatives	19,430	13,427
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	(17,892)	(11,914)
11	Total derivative exposures (sum of lines 4 to 10)	12,093	11,623
Securities financing transaction exposures			
12	Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	49,201	42,337
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(11,864)	(11,864)
14	Counterparty credit risk exposure for SFT assets	2,241	1,305
15	Agent transaction exposures	-	-
16	Total securities financing transaction exposures (sum of lines 12 to 15a)	39,579	31,778
Other off-balance sheet exposures			
17	Off-balance sheet exposures at gross notional amount	201	127
18	(Adjustments for conversion to credit equivalent amounts)	-	-
19	Other off-balance sheet exposures (sum of lines 17 to 18)	201	127
Capital and total exposures			
20	Tier 1 capital	1,893	1,421
21	Total leverage ratio exposures (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	68,188	55,891
Leverage ratio			
22	Leverage ratio	2.78%	2.54%
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	Fully Phased In

Table 4: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

The table shows a breakdown of the on-balance sheet exposures excluding derivatives, SFTs and exempted exposures, by asset class.

CRR Leverage Ratio Exposures		At 31 Dec 2019 £m	At 31 Dec 2018 £m
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	16,462	12,509
EU-2	Trading book exposures	14,023	11,222
EU-3	Banking book exposures, of which:	2,439	1,287
EU-4	Covered bonds	-	-
EU-5	Exposures treated as sovereigns	1,252	641
EU-6	Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns	91	22
EU-7	Institutions	466	385
EU-8	Secured by mortgages of immovable properties	-	-
EU-9	Retail exposures	-	-
EU-10	Corporate	356	35
EU-11	Exposures in default	-	-
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	275	204

5. Capital Resources

The Group's regulatory capital resources are assessed under the CRR and CRDIV. The Group's capital consists of Tier 1 – share capital, retained earnings and Additional Tier 1, and Tier 2 – subordinated debt which is fixed term and denominated in Japanese yen.

The Group enhanced its capital base this year with the objective of primarily meeting demands from the business. Post PRA approval the following capital injections took place during the year:

- In Q1 2019, the Group issued total GBP 157 million (Euro 180 million equivalent) common shares to MUSHD which qualifies as Common Equity Tier 1 Capital.
- In October 2019, the Group issued GBP 98 million (USD 125 million equivalent) common shares to MUSHD which qualifies as Common Equity Tier 1 Capital.
- In November 2019, the Group issued further GBP 157 million (USD 200 million equivalent) Subordinated Perpetual Contingent Conversion Security to MUSHD which qualifies as Additional Tier 1 Capital.

The Group manages its risk profile and its capital resources with the objective of maintaining a capital ratio in excess of the Capital Resources Requirement for its risk profile at all times. The management of the Group's capital is carried out under the principle that it should not unexpectedly need to raise new capital or significantly reduce its risk taking in order to meet its capital management objectives.

MUSHD and the Group's affiliate MUFG Bank provide support arrangements to the Group, including a 'Keep Well Agreement'. The Group is not aware of any material impediments to the transfer of capital resources from its parent or affiliate.

The Group has fulfilled its capital requirements at all times during the year. The breakdown of year-end capital for 2019 and 2018 is shown below. Further detail on capital instruments, including the terms and conditions of capital instruments in EBA templates, is provided in the Appendix (Table 30) to this document.

Table 5: Capital Resources

Capital Resources	At 31 Dec 2019 £m	At 31 Dec 2018 £m
Common Equity Tier 1 capital after deductions	1,430	1,114
Additional Tier 1 capital after deductions	464	307
Tier 2 capital after deductions	305	314
Total capital resources	2,199	1,735

Table 6: Capital Ratios

Capital Resources	At 31 Dec 2019 %	At 31 Dec 2018 %
Common Equity Tier 1 Ratio	16.3	14.0
Tier 1 Ratio	21.5	17.9
Total Capital Ratio	25.0	21.8

6. Capital Requirements

The Pillar 1 framework provides the basis for capital requirements arising from credit, market and operational risk. It covers the calculation of risk weighted assets (RWA) and the capital requirements. The Pillar 2 framework requires firms to hold capital for all risks not sufficiently covered in the Pillar 1 framework and ensures that firms have adequate capital to support the relevant risks in their business.

In the table below, the Group's Pillar 1 capital requirements set out the minimum capital required under the CRD IV.

Table 7: Capital Requirements

Pillar 1 Capital Requirements	At 31 Dec 2019 £m	2019 Average £m	At 31 Dec 2018 £m	2018 Average £m
Credit Risk (Including Concentration Risk)	433	360	327	363
Market Risk	218	241	261	259
Operational Risk	53	53	47	47
Total	703	654	635	669
Pillar 2A	378		303	
Total Capital Requirements [1]	1,081		938	

1 The term 'Total Capital Requirements' is defined in the Policy Statement 30/17 issued by the PRA

The capital requirements increased from the end of 2018 to 2019 across credit risk. A detailed description in respect of each risk type is provided in the following sections.

Internal Capital Adequacy Assessment Process (ICAAP)

The Group monitors its capital adequacy on an ongoing basis and conducts a formal annual ICAAP through which it assesses its risks, controls and capital.

The Board is involved in all the key elements of the ICAAP and approves the business and capital plans, Risk Appetite Statement, stress testing framework and oversees the preparation of the ICAAP document. The ICAAP process is closely aligned with the Group's strategy setting and business planning process as well as the process for identification, measurement and control of its risks.

Stress testing is used to assess the impact of severe but plausible financial stresses on either individual or multiple risk factors and to determine appropriate capital buffers. The Group manages its risk and capital resources with the objective of maintaining a regulatory ratio comfortably in excess of the minimum capital resources required by the regulators.

Capital Buffers

A number of capital buffers were introduced under CRD IV. The current UK countercyclical capital buffer ("CCyB") rate is set at 1%. The Financial Policy Committee (FPC) is raising the level of the UK CCyB rate to 2% with binding effect from 16 December 2020. Outside the UK, the following table shows all the relevant CCyB rates on foreign exposures for UK firms in specific countries at 31 December 2019.

Table 8: CCyB Rates on Foreign Exposures

Country	At 31 Dec 2019 CCyB rate	Implementation Date
Belgium	0.00%	01 Jan 2016
Bulgaria	0.50%	01 Oct 2019
Czech Republic	1.50%	01 Jul 2019
Denmark	1.00%	30 Sep 2019
France	0.25%	01 Jul 2019
Germany	0.00%	01 Jan 2016
Hong Kong	2.00%	14 Oct 2019
Iceland	1.75%	15 May 2019
Ireland	1.00%	05 Jul 2019
Lithuania	1.00%	30 Jun 2019
Luxembourg	0.00%	01 Jan 2016
Norway	2.50%	31 Dec 2019
Slovakia	1.50%	01 Aug 2019
Sweden	2.50%	19 Sep 2019
United States	0.00%	24 Oct 2016

7. Credit Risk

Credit risk is the risk of loss resulting from client, issuer or counterparty default and arises on credit exposure in all forms, including settlement risk. The Group measures credit risk capital requirements using the Standardised Approach.

Methodology

The Group takes counterparty and/or issuer credit risk through most of its business activities. Counterparty credit risk arises from derivatives and securities financing transactions (SFT). It is calculated in both the trading and non-trading books. Under CRD IV, four methods may be used to calculate exposure values for counterparty credit risk. These four methods are Mark-to-Market, Original Exposure, Standardised and Internal Models Method. The Group uses the mark-to-market method to determine the exposure value which is the sum of current replacement cost and potential future credit exposure.

Per Article 113 of CRR, the Group is required to use rating agencies' credit assessments for the determination of risk weights under the standardised approach to credit risk. The credit assessment should be produced by an eligible External Credit Assessment Institution ("ECAI") and used in a consistent manner over time. For regulatory purposes, the Group has selected Moody's Rating Agency as its nominated ECAI, with the exception of securitisation exposures where DBRS, a global credit rating agency, has been selected. ECAI ratings are used to determine risk weightings for all the relevant exposure classes. Tables below provide details of the Group's credit risk capital requirements:

Table 9: Credit Risk Capital Requirements[1]

Capital Requirements	At 31 Dec 2019 £m	At 31 Dec 2018 £m
Counterparty credit risk	260	216
Concentration risk	13	0
Non-Trading book credit risk[2]	79	38
Credit valuation adjustment	81	73
Total credit risk capital requirement	433	327

1 Derivatives, securities financing transactions (SFTs), and exposures to central counterparties are included.

2 Non-trading book credit risk includes both on and off balance sheet items including fixed assets and non-trading book issuer exposures.

Table 10: Counterparty Credit Risk Summary

	At 31 Dec 2019			At 31 Dec 2018		
	Exposure Value £m	RWAs[1] £m	Capital Required £m	Exposure Value £m	RWAs[1] £m	Capital Required £m
Central Government and Central Banks	515	0	0	529	7	1
Institutions (Excluding CCP)	5,195	1,263	101	2,622	725	58
Institutions (CCP)	7,406	351	28	7,558	397	32
Corporates	1,667	1,527	122	2,085	1,559	125
Multilateral Development Banks	10	-	-	38	-	-
Regional Government and Local Authority	56	11	1	17	3	0
International Organisations	117	-	-	43	-	-
Public Sector Entity	227	98	8	25	7	1
Total	15,193	3,250	260	12,916	2,698	216

1 Risk weighted asset

Table 11: Non Trading Book Issuer Exposure

	At 31 Dec 2019			At 31 Dec 2018		
	Exposure Value £m	RWAs £m	Capital Required £m	Exposure Value £m	RWAs £m	Capital Required £m
Central Government and Central Banks	610	-	-	192	-	-
Institutions (Excluding CCP)	15	3	-	27	5	-
Corporates	-	-	-	11	-	-
Multilateral Development Banks	444	-	-	341	-	-
Regional Government and Local Authority	28	-	-	28	-	-
International Organisations	115	-	-	40	-	-
Public Sector Entities	119	-	-	49	-	-
Grand Total	1,331	3	-	688	5	-

The Group has exposures to intragroup entities which exceed the large exposure limits defined in the CRR and the Group holds capital against these exposures. The Group monitors large exposures to third parties on the daily basis.

Credit Risk Management

The Group manages its credit risk in accordance with policies originated and approved within the Group and endorsed by its parent company. Counterparty exposure is managed through a process of credit risk assessment, limit setting, exposure monitoring and exception reporting.

The Group assesses the default probabilities of individual counterparties by using a rating methodology incorporating external ratings, the market price of credit risk and internal fundamental analysis.

Day–to-day responsibility for the management of credit risk resides with the front office departments and responsibility for second line review, challenge and oversight is with the Credit Risk Management department. The Credit Risk Management department is organisationally independent from the front office departments, and the Risk Analytics Group which is responsible for the design of new credit risk management models. Daily credit risk reports are prepared for Senior Management and trading departments using the Group's in house and vendor systems. Their objective is to:

- Identify, quantify, monitor and control credit risk exposure
- Provide sufficient, timely and relevant data of credit risk exposure by counterparty across all product classes and against each respective approved credit limit
- Maintain static data for all counterparties
- Produce timely credit risk reports as appropriate
- Mitigate credit risk by receiving collateral in accordance with the Group's Collateral Policy
- Provide credit portfolio monitoring and analysis.

On a monthly basis, Credit Risk Management reports the Group's total credit risk exposure to the Joint Credit Risk Management Committee ("JCRMC"), which is a sub-committee of the JRMC. Monthly reporting includes a review of large exposures, exposures to lower rated issuers and counterparties, and exposure to higher risk industry and country sectors. The JCRMC escalates material matters to the JRMC. The JRMC is also the forum where credit policies are reviewed and finally approved.

In addition to the JRMC, a summary of the Group's credit risk exposure is also reported monthly to the BRC.

Credit exposure is normally measured on a net basis i.e. by taking account of received collateral and aggregating trades with both positive and negative values provided that a legally enforceable master netting agreement has been executed that permits close-out netting. To mitigate derivative counterparty credit risk, the Group has Credit Support Annexes in place with the majority of its counterparties (this includes the exchange of initial margin with certain non-centrally cleared, over-the-counter derivatives counterparties for in-scope products) and guarantee arrangements in place with members of MUFG. Risk is managed net of these guarantees.

Credit Limits for Counterparty Credit Exposures

Credit limits for counterparty credit exposures are assigned within the overall credit process. The credit limits are assigned taking into account various factors, such as credit worthiness of the counterparty, type of transactions undertaken with the counterparty, contractual terms, credit risk mitigants and overall risk appetite within the Group. The risk appetite is a key consideration and the credit limits are established to ensure that exposure remains within risk appetite. In addition, specific credit limits are assessed and allocated to third parties based on the estimated exposure measure.

The Group expresses its aggregate appetite for credit risk, including counterparty risk, by allocating an amount of capital to credit risk, that is approved by the Board. Limits for individual counterparties and groups are allocated within this capital allocation taking into account the credit assessment of the counterparty and group as well as the nature of the business relationship with that counterparty.

The tables below show breakdowns of regulatory counterparty credit exposures by geography, industry, credit quality and residual maturity. Details of derivatives exposures and exposures to Credit Default Swaps are also included.

Table 12: Counterparty Exposure by Exposure Class and Geography

At 31 December 2019	UK £m	Europe ex. UK £m	Japan £m	Asia ex Japan £m	North America £m	Other £m	Total £m
Central government and central banks	67	448	-	-	-	-	515
Institutions (Excluding CCP)	507	1,316	622	33	2,594	123	5,195
Institutions (CCP)	4,092	347	1,192	-	1,775	-	7,406
Corporates	149	330	81	95	659	353	1,667
Multilateral development banks	-	3	-	-	7	-	10
Regional government and local authority	-	-	-	37	6	13	56
International Organisations	-	117	-	-	-	-	117
Public sector entities	-	161	-	-	-	66	227
Total	4,815	2,722	1,895	165	5,041	555	15,193

At 31 December 2018	UK £m	Europe ex. UK £m	Japan £m	Asia ex Japan £m	North America £m	Other £m	Total £m
Central government and central banks	44	484	-	-	-	-	529
Institutions (Excluding CCP)	781	852	319	20	487	163	2,622
Institutions (CCP)	4,190	527	682	-	2,158	-	7,558
Corporates	132	147	78	11	1,502	214	2,085
Multilateral development banks	-	2	-	-	35	-	38
Regional government and local authority	-	-	-	2	2	13	17
International Organisations	-	43	-	-	-	-	43
Public sector entities	-	14	-	-	-	11	25
Total	5,147	2,070	1,080	34	4,185	401	12,916

Table 13: Corporate Counterparty Exposure by Industry

	At 31 Dec 2019 £m	At 31 Dec 2018 £m
Financial and insurance activities[1]	1,375	1,920
Mining and quarrying	95	39
Manufacturing	80	43
Information and communication	41	10
Transporting and storage	40	-
Other services activities	13	67
Administrative and support service activities	11	-
Electricity, gas, steam and air conditioning supply	9	1
Real estate activities	2	2
Professional, scientific and technical activities	1	1
Total	1,667	2,085

1 'Financial and insurance activities' category contains Insurance, Other financial firms, and Special purpose entities among others

Table 14: Counterparty Exposure by Credit Quality Step

At 31 December 2019	CQS 1 £m	CQS 2 £m	CQS 3 £m	CQS 4 £m	Unrated £m	Total £m
Central government and central banks	-	-	-	-	515	515
Institutions (Excluding CCP)	645	2,505	105	-	1,940	5,195
Institutions (CCP)	-	-	-	-	7,406	7,406
Corporates	116	17	35	-	1,499	1,667
Multilateral development banks	10	-	-	-	-	10
Regional government and local authority	-	-	-	-	56	56
International Organisations	-	-	-	-	117	117
Public sector entities	3	-	-	-	224	227
Total	773	2,522	140	-	11,758	15,193

At 31 December 2018	CQS 1 £m	CQS 2 £m	CQS 3 £m	CQS 4 £m	Unrated £m	Total £m
Central government and central banks	-	-	-	-	529	529
Institutions (Excluding CCP)	657	700	124	-	1,141	2,622
Institutions (CCP)	-	-	-	-	7,558	7,558
Corporates	61	953	2	36	1,034	2,085
Multilateral development banks	38	-	-	-	-	38
Regional government and local authority	-	-	-	-	17	17
International Organisations	-	-	-	-	43	43
Public sector entities	13	-	-	-	12	25
Total	769	1,652	126	36	10,333	12,916

Table 15: Counterparty Exposure by Residual Maturity

At 31 December 2019	Less than 1 year £m	1-5 years £m	More than 5 years £m	Total £m
Central government and central banks	515	-	-	515
Institutions (Excluding CCP)	3,594	189	1,412	5,195
Institutions (CCP)	400	1,240	5,766	7,406
Corporates	948	589	130	1,667
Multilateral development banks	2	-	8	10
Regional government and local authority	56	-	-	56
International Organisations	117	-	-	117
Public sector entities	224	-	3	227
Total	5,857	2,018	7,319	15,193

At 31 December 2018	Less than 1 year £m	1-5 years £m	More than 5 years £m	Total £m
Central government and central banks	529	-	-	529
Institutions (Excluding CCP)	1,056	131	1,434	2,622
Institutions (CCP)	433	1,820	5,305	7,558
Corporates	1,840	200	45	2,085
Multilateral development banks	-	26	11	38
Regional government and local authority	15	-	2	17
International Organisations	43	-	-	43
Public sector entities	12	2	12	25
Total	3,928	2,179	6,808	12,916

Table 16: Derivatives Exposure and Collateral Summary

At 31 December 2019	Excluding CCP £m	CCP £m	Total £m
Gross exposure of derivatives contracts	25,780	53,090	78,869
of which: positive fair value of derivative contracts	17,516	39,064	56,580
Less: netting benefits	15,732	45,058	60,790
Net exposure after netting benefits	10,047	8,032	18,079
Less: collateral held	7,868	821	8,689
Net exposure after credit mitigation	2,179	7,211	9,390

At 31 December 2018	Excluding CCP £m	CCP £m	Total £m
Gross exposure of derivatives contracts	25,772	34,932	60,704
of which: positive fair value of derivative contracts	17,009	22,675	39,684
Less: netting benefits	15,382	26,416	41,798
Net exposure after netting benefits	10,390	8,516	18,906
Less: collateral held	8,305	1,290	9,595
Net exposure after credit mitigation	2,085	7,226	9,311

Table 17: Credit Default Swap

Notional Amount	At 31 Dec 2019 £m	At 31 Dec 2018 £m
Protection bought	18,925	13,030
Protection sold	19,430	13,427

Note: Credit derivative products are principally used for intermediations only. This is to enable our clients to take a position (or positions) in the underlying securities.

Residual Credit Risk

Residual credit risks are those that are not captured by standard credit risk models. The Group's residual credit risk is made up of issuer positions in the Banking Book and wrong way risk from reverse repo, bought CDS or certain cross currency swaps.

The Group uses a combination of pre-trade approval, large haircuts, Credit Support Annexes ("CSAs") and correlated credit provisions to mitigate residual credit risk.

Credit Concentration Risk

Credit concentration risk is the risk arising from an uneven distribution of exposures, through single name, sector or geographical concentration. The Group analyses the credit concentrations through its daily credit exposure reports. The Group's exposures are concentrated on government bonds, the financial sector and exposures to Japanese markets and counterparties. In addition, the Group carries out stress testing and scenario analysis on its largest credit exposures.

Credit Risk Mitigation

Credit mitigation is encouraged to reduce credit risk and can be achieved through:

- Risk reducing trades – these do not need approval
- Collateral arrangements – which must be legally enforceable to be recognised as mitigation
- Guarantee arrangements – through which exposure may be transferred to the guarantor

Securities financing transactions involving the use of bonds/debt securities as collateral are considered on the basis of the rating of the counterparty and the rating and haircut of the collateral. The combination of these two factors determines the standard terms and level of pre-approval required. Securities financing transactions involving the use of equities as collateral are considered on the basis of the rating of the counterparty and the haircut. Credit Risk Management (CRM) may restrict the types of collateral available for trades with a specific counterparty. Collateral should be daily tradable assets having firm price available in the markets or trading platforms. Reference assets, which are not marked to market or not readily tradable in the market have to be pre-approved by the CRO or their delegate and are considered structured securities. Asset Backed Securities are considered acceptable reference assets, not requiring specific pre-approval.

The Group provides derivative products for MUFG Bank clients as a core business. Most of these transactions are covered by a guarantee from MUFG Bank that transfers credit risk to MUFG Bank. Collateral is generally cash collateral for derivatives and high quality government bonds. Concentrations of collateral received through securities financing are reported to Senior Management.

Collateral Management

Collateral & credit reserves

The Group has Credit Support Annexes and/or Contractual Margining Agreements in place which cover the majority of its non-MUFG Bank guaranteed derivative exposures. The majority of these have low or zero thresholds and are not dependent upon the Group's or other MUFG members' credit rating. For MUFG Bank guaranteed exposures, they are collateralised on the daily basis. For derivative transactions, the collateral provided is predominantly cash denominated in Japanese yen. For SFTs, the collateral is mainly securities issued by European and Japanese governments. For structured financing, the collateral is assessed on a case-by-case basis to ensure adequate collateral is provided for exposures taken by the Group. The Group applies regulatory volatility adjustments to collateral for the capital calculation in line with CRR.

Documentation requirements depend on the type of product and level of credit risk. Market-Standard Master Agreements are required for market traded instruments. Any agreement that is used should also have a clean legal opinion for enforceability, close out netting and collateral set off, as appropriate, or else the exposure measure reflects the lack of such legal arrangements. For most counterparties, trading is subject to a market-standard Credit Support Annex with daily margining and zero threshold. Non-standard agreements need to be individually approved. The Group makes adjustments to P&L in respect of expected losses by counterparty using a Credit Valuation Adjustment.

Since September 2016 the Group has been obliged to exchange initial margin and variation margin with certain non-centrally cleared over-the-counter derivatives counterparties and has received approval from the National Futures Association to allow it to use an internal model for the calculation of initial margin under the Commodity Futures Trading Commission's rules. It uses the Standardized Initial Margin Model developed by the International Securities Dealers Association to calculate initial margin in accordance with those rules.

Collateral downgrade

The Group manages its exposure to collateral downgrades. Executive Committee approval is required for legal agreements with counterparties which contain clauses pertaining to the Group's downgrade (i.e. require extra collateral in the event of a downgrade).

In addition, the Group monitors daily the idiosyncratic stress scenario which reflects a firm specific stress event triggered by market wide concerns about the Group's capacity to meet liabilities as they fall due and this takes into account the impact of the amount of collateral the Group would have to provide given a downgrade in its credit rating.

Wrong Way Risk Policy

Wrong way risk is the risk that counterparty exposures increase at the same time as the probability of counterparty failure to pay also increases. This can result in a wrong way risk or legal dependence between: (i) the counterparty and collateral held, and/or (ii) the counterparty and the performance/ market exposure of its' derivative contracts. As part of the credit review process, each counterparty is normally assessed and measured for wrong-way risk. If material wrong way risk is identified the collateral/underlying asset is deemed ineligible for regulatory risk calculations and risk is measured on an uncollateralised basis. The Group undertakes daily and monthly monitoring of the Group's wrong way risk positions.

Settlement and Delivery Risk

Settlement risk is the risk of loss when a counterparty fails to meet its reciprocal obligation to exchange cash or securities on the due date. Failure to perform may result from the counterparty's default due to solvency or liquidity problems, operational problems, market liquidity constraints, or other factors. Non-reciprocal risk, i.e. pre-settlement credit risk is captured as part of the main credit risk measure.

On–the-day settlement risk arises when the Group initiates payment or delivery to the counterparty and continues until the reciprocal payment or delivery is received. With Delivery Versus Payment (DVP) settlement, the risk of credit loss on the principal is effectively eliminated, but may give rise to other risks in the case of non-delivery. Free of Payment (FOP) transactions represent a certain level of credit risk as the Group will be exposed to the credit loss of the full principal amount as well as the market risk during settlement until a replacement transaction is completed. The Group's key controls include:

- FOP Delivery Risk credit limits reflecting the Group's assessment of the counterparty's credit worthiness.
- Delivery Risk is monitored daily to ensure that settlements are performed within the approved FOP limits.

Securitisation

The securitisation regulatory framework defined by the CRR specifies two methods for calculating credit risk requirement for securitisation positions in the non-trading book: the Standardised approach and the IRB approach. The Group uses the Standardised approach.

Currently the Group's securitisation exposures are limited to CLO warehouse businesses where the Group provides liquidity to the warehouse. Under this structure, the Group is considered a sponsor to the structure and the exposures to the CLO warehouse businesses are risk-weighted as non-trading book securitisation exposures for regulatory purposes.

At 31 December 2019, the Group had securitisation exposures which are shown in the table below.

Table 18: Securitisation Exposure

	At 31 Dec 2019			At 31 Dec 2018		
	Exposure Value £m	RWAs £m	Capital Required £m	Exposure Value £m	RWAs £m	Capital Required £m
As sponsor						
Loans to corporates	161	235	19	123	161	13

8. Market Risk

Market risk is the risk of losses from movements in market prices in the trading portfolio. The Group uses a variety of risk measures to quantify and control this risk, with the overall objective of ensuring that potential losses arising from market risk remain within the appetite set by the Board:

- Value at Risk ("VaR"), Stressed Value at Risk ("SVaR"), and Incremental Risk Charge ("IRC") measures provide aggregate indicators of potential losses, subject to stated confidence levels and holding periods
- Risk factor sensitivities measure the impact of moves in each risk factor, allowing concentrations of risk to be identified and controlled
- Stress testing is used to monitor and control the exposure of the portfolio to extreme moves in market rates and prices. A range of stress tests is run, covering exposures to relevant market factors and scenarios in various market conditions
- Stop loss and drawdown limits monitor actual losses at the Group, business unit, department, and trader level.

Day–to-day responsibility for the management of market risk resides with the front office departments and responsibility for second line review, challenge and oversight is with the Market Risk Management department. The Risk Analytics Group is responsible for the design of new market risk management models. Daily market risk reports are prepared for senior management and trading departments using the Group's in house and vendor systems.

The market risk capital requirement is measured using internal market risk models, where approved by the PRA, or under the Standardised Approach. The Group's internal market risk models comprise VaR, SVaR, IRC, and Risks Not In VaR ("RNIV") which covers all major asset classes traded by the Group.

The table below shows the market risk capital requirements.

Table 19: Market Risk Capital Requirements

Capital Requirements	At 31 Dec 2019 £m	At 31 Dec 2018 £m
VaR	31	34
Stressed VaR	83	108
Incremental Risk Charge (IRC)	60	73
Risks Not In VaR (RNIV)	38	40
Other Market Risk	6	7
Total Market Risk Capital Requirements	218	261

VaR Modelling

The VaR of a trading book is an estimate of the potential loss on risk positions as a result of movements in market rates and prices over a specific time horizon and to a given confidence level.

The Group uses VaR methodologies to monitor the price risks arising from different trading books across portfolios. This is measured based on a 99% confidence level and a 1-day holding period.

Actual profit and loss outcomes are also monitored to test the validity of the assumptions made in the calculation of VaR. The VaR outputs are based on a full revaluation historical simulation model and a 2-year data window.

The Group additionally calculates SVaR using an appropriately stressed 1-year lookback period as required by regulatory rules.

The following table shows VaR figures for 2019 and 2018. The "Close" column shows the VaR at the year-end date. The "Average" column shows the average VaR measurement from each trading day in the year and the "Maximum" and "Minimum" columns show the highest and lowest VaR value in the year respectively. "Diversification benefit" is the difference between the simple sum of the VaRs for each risk factor, and the Group's overall VaR, which is based on the simultaneous modelling of all risk factors.

Table 20: Breakdown of VaR

	At 31 Dec 2019 Close £m	2019 Average £m	2019 Maximum £m	2019 Minimum £m
Interest Rate Curve Risk	1.0	1.0	2.7	0.4
Interest Rate Vega Risk	1.0	1.2	2.1	0.6
Asset Spread Risk	1.0	2.0	4.6	1.0
Currency Risk	0.3	0.3	0.7	0.1
Equity Price Risk	0.2	0.2	0.7	-
Equity Vega Risk	0.3	0.5	1.1	0.1
Inflation Risk	0.1	0.1	0.1	-
Basis Risk	1.2	1.3	1.9	0.9
Diversification benefit	-3.0	n/a	n/a	n/a
Total VaR	**2.0**	**2.8**	**5.1**	**1.6**

	At 31 Dec 2018 Close £m	2018 Average £m	2018 Maximum £m	2018 Minimum £m
Interest Rate Curve Risk	1.8	1.6	4.2	0.5
Interest Rate Vega Risk	1.7	2.2	3.2	1.1
Asset Spread Risk	2.4	3.1	3.9	1.9
Currency Risk	0.6	0.5	1.1	0.1
Equity Price Risk	0.4	0.3	1.5	-
Equity Vega Risk	0.6	0.5	1.2	0.1
Inflation Risk	0.1	0.1	0.1	0.1
Basis Risk	1.3	1.9	3.6	1.1
Diversification benefit	-5.5	n/a	n/a	n/a
Total VaR	**3.4**	**4.2**	**5.8**	**2.4**

VaR Backtesting

The Group carries out a daily comparison of end of day VaR measures to the 1-day change of the portfolio's actual value and hypothetical value on the day the profit and loss figures are produced. In 2019 the number of occasions on which actual trading book outcomes or hypothetical trading book outcomes exceeded the previous day's VaR was within the acceptable tolerances of the model. In addition to the VaR backtesting at the aggregate Group level, the Group conducts backtesting on a number of sub-portfolios across the different business units.

Stressed VaR

The Group calculates Stressed VaR based on inputs calibrated to historical data from a continuous twelve-month period of significant financial stress relevant to the Group's portfolio.

The table below shows the highest, the lowest, the mean and at 31 December 2019 and 2018 the stressed VaR measures over the reporting period and as per the period end.

Table 21: Stressed VaR (One-day Equivalent)

	2019 £m	2018 £m
At 31 December	8.7	10.6
Maximum	14.7	17.6
Minimum	5.6	4.1
Average	8.5	9.4

Risks Not In VaR

The Group calculates additional capital under its RNIV framework for certain risk factors that are not fully captured in VaR.

Incremental Risk Charge

The Group calculates IRC which captures risk from the default and rating migration of non-securitised credit exposures in the trading book. The IRC is calculated at least weekly and is included in regulatory capital calculations. IRC is calculated using a Monte Carlo model of portfolio rating migration and default. Risk is measured over a 1-year horizon to a confidence level of 99.9% and is calculated on current positions assuming that risk will be at similar levels throughout the year.

Liquidity horizon is calculated taking various factors into account, such as size of positions, type of issuer, concentration versus total issue, liquidity of pricing source etc. The Group portfolio weighted average liquidity horizon is 3.04 months.

The table below shows the highest, the lowest, the mean and at 31 December 2019 and 2018 the Incremental Risk Charge over the reporting period and as per the period end

Table 22: Incremental Risk Charge

	2019 £m	2018 £m
At 31 December	52.0	70.0
Maximum	98.0	84.5
Minimum	51.9	54.6
Average	65.1	69.4

Other Market Risk

Other market risk consists of positions not captured in the VaR model. Exclusion from the VaR model may be due to the VaR model not being able to adequately capture the risk or not having regulatory permission to include a position in the VaR model. The Group currently does not have permission to include MUS(EU)'s exposures in its VaR model and these are captured under the Standardised Approach.

The table below shows the market risk capital requirements under the Standardised Approach.

Table 23: Market Risk Capital Requirement – Standardised Approach

Capital Requirements	At 31 Dec 2019 £m	At 31 Dec 2018 £m
Equity position risk	0.8	2.0
Foreign exchange position risk	3.8	2.0
Interest rate position risk	1.4	2.9
Total	6.0	6.9

Inclusion in the Trading Book

Trading intent is a crucial element in deciding whether a position should be treated as a trading or banking book exposure. For regulatory purposes, the trading book covers all positions in CRD financial instruments which are held with trading intent. Positions in the trading book are subject to market risk capital, computed using models where the Group has the regulatory approval mentioned above. Otherwise the market risk capital requirement is calculated using the Standardised Approach as defined in the CRR.

Prudent Valuation Adjustment

Where there are a range of plausible alternative valuations, the Prudent Valuation Adjustment (PVA) is applied to accounting fair values. All trading book positions are subject to PVA which is calculated in accordance with Article 105 of the CRR. Refer to row 7 of Table 31 in the Appendix for details.

9. Interest Rate Risk in Banking Book

The Group's interest rate risk in the banking book remains relatively small. The Group calculates VaR internally on these positions on a daily basis as part of its monitoring process. In addition, the Group periodically carries out stress testing which includes these positions.

10. Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events, including legal risk.

The Group manages and controls its exposure to operational risk through its policies and procedures, which are designed to ensure that it:

- Mitigates the risk of exposure to fraud
- Processes transactions correctly, accurately and on a timely basis
- Protects the integrity and availability of information processing facilities, infrastructure and data
- Maintains the confidentiality of its client information
- Employs appropriate numbers of skilled staff and complies with relevant employment laws and regulations
- Establishes workplace environments that are safe for both employees and visitors
- Reduces both the likelihood of an event occurring and the impact should an event occur.

The Group employs The Standardised Approach ("TSA") for calculating its Pillar 1 operational risk capital requirement. The Group is committed to adopting leading industry practices for managing and measuring operational risk, and has also developed a primarily scenario based capital model to determine whether it should hold any additional capital for operational risk.

In order to facilitate the management of operational risk, the Group sub-divides its Risk Taxonomy into the seven Basel II categories, i.e.:

1. Execution, delivery and process management
2. Clients, products and business practices
3. Internal fraud risks
4. External fraud risks
5. Employment practices and workplace safety events
6. Business disruption and systems failures
7. Damage to physical assets.

Operational Risk Management Framework

The Operational Risk Management Framework is defined within the Group's policies and detailed standards, and comprises of the following key elements:

- Governance: The Operational Risk Governance Structure outlines the committees and meetings through which key risk and control concerns and events are escalated, risk management action is driven and risk management decisions are made
- Risk appetite: The Group has defined its Operational Risk Appetite in both quantitative and qualitative terms, reflecting both the financial and non-financial impacts that can arise from operational risk
- Risk and Control Self-Assessments (RCSAs): Departments within the Group assess the operational risks they face, and the effectiveness of their controls at mitigating that mitigate those key operational risks, relative to the Group's appetite
- Self-Identified Issues (SIIs): Departments identify, record and manage the remediation of deficiencies and/or weaknesses in their risk and control environments
- Key control attestations: Managers confirm regularly that their key controls have operated correctly
- Scenario analysis: The Group uses scenario analysis to assess the risks of extreme but plausible events
- Key risk & control indicators: The Group uses metrics to monitor its operational risk profile and to alert management when risk levels exceed acceptable ranges
- Internal Operational Risk Events: The Group systematically collects details of both operational risk losses (or gains) above a certain threshold and details of incidents, even if they have not led to losses (or gains) and root cause analysis where applicable
- External Operational Risk Events: Business and support departments use information obtained from external events to assess their own risk profile, understand "lessons learned" and evaluate and adapt their current control environment from events which have impacted similar firms' business processes
- Remedial actions: Progress in completing remedial actions is tracked and reported
- Reporting: The operational risk department and management uses reports to understand, monitor, manage and control operational risks
- Insurance policies: As part of its risk management approach, the Group uses insurance to mitigate the impact of some operational risks
- Training: Staff are required to undertake annually mandatory on-line operational risk awareness training.

The Group has a dedicated Operational Risk Management department. Issues of significance are escalated to the Joint Operational Risk and Controls Committee ("JORCC"), which reports to the JRMC and meets on a monthly basis.

Technology and Cyber Risk

The Technology and Cyber Risk team in the Operational Risk Management Department is responsible for second line oversight and challenge for technology and cyber. Technology and Cyber risk management information ("MI") is presented to the JORCC and any material matters are escalated to the JRMC.

The Company has a dedicated Technology Risk and Control function in the first line with responsibility for the technology and cyber risk. Areas of focus include the top risks and threats related to: network security; malware and firewall threats; access management; data backups; security patching; user awareness training; monitoring and reporting service and security events. It also delivers testing and mitigation activities to identify any potential security vulnerabilities in the infrastructure platforms and business applications. The Company has an ongoing programme of work that continually invests in improving controls to manage and reduce the threat from technology and cyber risk.

11. Liquidity Risk

Liquidity risk is the risk that the Group has insufficient resources to meet its financial obligations as they fall due. This risk could arise from both institution-specific and market-wide events.

Oversight

The ultimate responsibility for liquidity risk management sits with the Board who sets the Group's liquidity risk appetite, which expresses the level of risk the Group chooses to take in pursuit of its strategic objectives. The Board mandate to the Executive Committee in respect of liquidity risk includes specification of liquidity stress testing, approval of business line unsecured funding limits, transfer pricing rates/policy and the contingency funding plan.

The Executive Committee has determined the powers and discretions delegated to the ALCO which meets monthly or on an ad-hoc basis (as appropriate) to:

- Review and define the funding and liquidity risk policy
- Monitor the Group's liquidity risk profile and review compliance with the Board approved liquidity risk appetite
- Oversee and review stress testing
- Measure, monitor and mitigate liquidity risk exposures for the Group
- Ensure that appropriate business incentives are maintained that reflect the cost and availability of liquidity through the Group's Funds Transfer Pricing ("FTP") process and unsecured funding limit allocation process
- Review critical liquidity risk factors and prioritise issues arising
- Determine the Group's funding plans and funding diversification strategy in light of business projections and objectives.

The Group uses a variety of quantitative and qualitative measures to monitor the adequacy of the Group's liquidity resources and to ensure an integrated approach to liquidity risk management. This framework incorporates a range of tools described below:

Internal Stress Testing

The Group's primary liquidity stress testing tool is the Maximum Cumulative Outflow model, which is designed to capture all material drivers of liquidity risk (both on and off balance sheet) under different scenarios, and to determine the size of liquidity resources needed to navigate the stress event. The model has been developed as a synthesis of market practice, regulatory requirements and past experience in stressed market conditions. The scenarios modelled are categorised as baseline (reflective of normal business conditions), systemic (refers to a market-wide liquidity event) and combined (analogous of a combined market and the Group specific stress event). Stress testing is conducted on both an aggregated currency basis and by material individual currency.

Funds Transfer Pricing

The Group seeks to align its liquidity risk appetite with the strategic objectives of the business through regulating the demand for liquidity and allocating the cost of liquidity on the basis of unsecured funding usage and underlying liquidity requirements. The ALCO is responsible for the FTP policy framework, and

Treasury is responsible for the day to day application of the FTP framework. The cost of funding is allocated to businesses on the basis of the funding requirements to finance current inventory positions and ongoing business activities. The cost of liquidity reserved to cover contingent liquidity outflows is also allocated to the business – this includes liquidity reserved to cover regulatory liquidity requirements.

Funding Plan

The balance sheet projection process balances aggregate business line requests for unsecured funding against Treasury's assessment of the projected balance sheet, funding requirements and capacity for the Group to raise unsecured financing. The ALCO will review and approve funding plans including allocation of funding limits to business lines. This ensures that business activities do not impose an unknown strain on the Group's ability to source adequate liquidity in normal business conditions, and allows Treasury to plan and sustain appropriate levels of liquidity in anticipation of business line funding usage. As part of funding liquidity risk monitoring, Treasury looks at the short and long term currency mismatch horizons in accordance with the Board's guideline.

Liquid Asset Buffer

The Group holds its liquidity portfolio in a stock of high quality government bonds and bonds issued by multi-lateral development banks, local government and agency issuers, as well as central bank deposits (where applicable). The size of the liquidity buffer is calibrated using both the Group's internal stress testing framework and applicable regulatory requirements. The liquidity portfolio is held on an unencumbered basis without restrictions on rehypothecation and with full Group legal ownership. The investment criteria for the liquidity portfolio are approved by ALCO with risk limits imposed and monitored by Market Risk Management.

Contingency Funding Plan

The Contingency Funding Plan ("CFP") allows senior management to identify internal and external triggers indicative of a stress event, and initiate the most effective response for stabilising and mitigating liquidity risk exposures through clear operational plans, clearly defined decision making responsibilities and effective communication with both internal and external stakeholders. The CFP also specifies the means through which additional funding should be sourced during a period of heightened liquidity concern.

The Group also maintains detailed recovery plans which consider actions to facilitate recovery or an orderly resolution from a severe stress.

Liquidity Stage Assessment

The principal assessment framework within the Funding Liquidity Risk Management Policy is the liquidity stage assessment. This is a formal assessment of the external environment affecting the Group and other companies within the MUSHD Group.

The liquidity stage is determined by an evaluation of the availability of funding and is monitored through a combination of early warning indicators, the Group's internal stress testing and compliance with regulatory liquidity requirements. Elevation of the liquidity stage is specifically linked to activation of the CFP, which provides a range of mitigating actions to be taken. Such actions are taken following consideration of any relevant market, economic or client impact. In the event the liquidity stage is elevated, formal approval is required from the ALCO, which will in turn escalate and sanction actions as appropriate. Monitoring of the liquidity stage is conducted at the Group and MUSHD level on an on-going basis. Any elevation of liquidity stage risk at the MUSHD level is deemed to represent a worsening of conditions that would impact the

Group too. The Funding Liquidity Risk Policy identifies general contingency actions to be taken by departments at each stage.

Disclosures on the Liquidity Coverage Ratio are presented below.

Table 24: LCR Disclosure Template

Scope of consolidation : solo		Total weighted value			
Currency and units (GBP million)					
Quarter ending on		29 Mar 2019	28 Jun 2019	30 Sep 2019	31 Dec 2019
Number of data points used in the calculation of averages		1	3	3	3
		Total adjusted value			
		£m	**£m**	**£m**	**£m**
21	Liquidity buffer	4,383	4,970	5,377	5,404
22	Total net cash outflows	1,615	1,818	2,031	2,809
23	Liquidity coverage ratio (%)	271%	275%	265%	193%

Scope of consolidation : solo		Total weighted value			
Currency and units (GBP million)					
Quarter ending on		29 Mar 2018	29 Jun 2018	28 Sep 2018	31 Dec 2018
Number of data points used in the calculation of averages		3	3	3	3
		Total adjusted value			
		£m	**£m**	**£m**	**£m**
21	Liquidity buffer	4,344	4,560	4,070	4,612
22	Total net cash outflows	2,266	2,183	2,166	1,996
23	Liquidity coverage ratio (%)	192%	209%	188%	231%

Table 25: Liquidity Risk Management

	Comment
Strategies and processes in the management of the liquidity risk	The Group employs a number of tools and policies to manage liquidity risk. These include: (i) Board approved liquidity risk appetite. This specifies the amount of liquidity risk deemed acceptable in the pursuit of its strategic goals. The Board requires there are sufficient liquidity resources (in the form of a portfolio of unencumbered High Quality Liquid assets (HQLA) Level 1, credit quality step (CQS) 1 plus JGBs and central bank deposits (where applicable)) such that all funding requirements and unsecured debt obligations falling due within two separately defined stress scenarios can be met without the need to roll unsecured funding or the forced liquidation of assets. The two scenarios envisage a 90 day market stress, as well as a 30 day combined market and MUFG stress. In addition the Firm requires sufficient liquidity resources are available to ensure regulatory liquidity compliance (Pillar 1 and Pillar 2 add-ons). (ii) Control of unsecured funding usage. The Group allocates unsecured funding limits to business lines and monitors compliance against these limits on a daily basis, with breaches highlighted and mitigating actions taken. (iii) The Funds Transfer Pricing process is designed to allocate the cost of liquidity to the users of liquidity. (iv) Currency stress testing. The Group's framework envisages a 2 week FX market lockout. This drives the currency composition of the liquidity buffer (v) The Contingency Funding Plan outlines early warning indicators (both internal and external) used to indicate a potential liquidity crisis, internal triggers to determine the severity of any potential liquidity stress event as well as escalation and activation procedures. The CFP outlines potential steps to be taken in the event the CFP is activated, as well as the means to determine whether the stress has passed and process for deactivating the CFP. (vi) Liquidity prediction – this is a regular assessment of available resources and their capacity to meet potential changes in balance sheet composition over the business planning horizon.

	Comment
Structure and organisation of the liquidity risk management function (authority, statute, other arrangements)	The overall liquidity risk appetite is set by the Group's Board and cascaded throughout the firm. The Board delegates responsibility over the day to day management of liquidity risk to the Executive Committee who in turn empower the Asset & Liability Committee with responsibility for the day to day management of liquidity risk. The Group employs the "3 lines of defence" model in the management of liquidity risk. The primary responsibility for monitoring and managing the Group's liquidity risk profile sits with Treasury function. Treasury is independent of business lines and forms part of the support functions reporting to the CFO. Treasury owns the overall stress testing framework and ensures there is sufficient liquidity available to both support business activities and to ensure compliance with the Board approved liquidity risk appetite as well as regulatory requirements. The second line of defence is provided by the Liquidity Risk Management function who ensures that liquidity risk is appropriately measured, assessed and reported. This function provides review and challenge of all components of the liquidity risk management framework. The Information & Data Management function (as a second line reporting function) is responsible for reporting the Group's liquidity position against both internal and external regulatory metrics on a regular basis. Internal audit (as third line) provides independent review and assurance to the Board.
Scope and nature of liquidity risk reporting and measurement systems	Regulatory reporting and monitoring compliance conforms with the Prudential Regulation Authority's requirements. The firm has robust systems and procedures in place to be able to meet these requirements.
Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants	Policies for managing liquidity risks include: (i) Internal stress testing. The underlying assumptions and methodology are approved by the Board. The stress models are calculated on a daily basis by the Information and Data Management function and circulated to senior management. Clear escalation processes with clear linkages to the Contingency Funding Plan in the event triggers are breached. (ii) Wholesale refinancing mismatch limits will limit the term mismatch inherent in the Firm. Limits are in place and monitored on a daily basis with clear escalation points in the event of limit breaches. (iii) The size of the liquidity buffer is quantified with respect to both the internal stress tests and regulatory tolerances. Governance surrounding the investment of the liquidity buffer ensures compliance with senior management approved risk limits. The Market Risk Management function monitors compliance against such limits on a daily basis. (iv) The Funds Transfer Pricing framework allocates liquidity costs to business lines on the basis of their unsecured funding usage and underlying liquidity requirements. (v) Allocation of the firm's unsecured funding capacity is based on both the firm's business plans as well as an assessment of the availability of funding. This ensures that limits can be supported without reliance on short term financing. (vi) FX limits. The Group conducts liquidity stress tests for all material currencies assuming a 2 week FX market lockout. In addition the Board has set limits on longer term structural currency imbalances. Both the currency stress tests and longer cross currency limits are monitored on a daily basis. (vii) The Contingency Funding Plan is regularly tested and ensures that a template exists for timely and consistent decision making in the event of a stress. It provides criteria for the invocation of the CFP by identifying triggers, clear operational plans with clearly defined decision making responsibilities in order to effectively navigate a potential stress event as well as the framework for the deactivation of the CFP once the crisis is deemed to have passed.
A declaration approved by the management body on the adequacy of liquidity risk management arrangements of the institution providing assurance that the liquidity risk management systems put in place are adequate with regard to the institution's profile and strategy	The Group's Board approved the Firm's ILAAP in April 2019. The ILAAP (Internal Liquidity Adequacy Assessment Process) is a regulatory requirement requiring the firms to "identify, measure, manage and monitor liquidity and funding risks across different time horizons and stress scenarios, consistent with the risk appetite established by the firm's management body". In approving the ILAAP, the Board documents that the firm's liquidity risk profile and systems used to manage liquidity risks are consistent with the risk appetite approved by the Board. The ILAAP demonstrates the Group's overall liquidity adequacy through its stress testing results, regulatory liquidity compliance, elaboration of key liquidity risks and material mitigants.

	Comment
A concise liquidity risk statement approved by the management body succinctly describing the institution's overall liquidity risk profile associated with the business strategy. This statement shall include key ratios and figures (other than those already covered in Annex II of these guidelines) providing external stakeholders with a comprehensive view of the institution's management of liquidity risk, including how the liquidity risk profile of the institution interacts with the risk tolerance set by the management body	Liquidity risk is the risk that the Group is unable to meet liabilities as they become due without significant cost or that the Group is unable to meet the minimum regulatory requirements. Liquid assets are required to protect the business from risks arising from its risk appetite. The risk appetite is to manage the balance sheet so as to withstand severe but plausible stresses without the need to significantly alter our business. Therefore the Group will seek to: (i) maintain appropriate levels of liquidity to ensure the firm manages its liquidity risk (ii) ensure that balance sheet usage is diversified by tenor and liquidity (iii) maintain a liquidity profile that allows a stress test survival period of either 30 days (combined) or 90 days (market) to be met by LAB and available liquid assets. (iv) maintain an appropriate trigger above ILG minimum to ensure sufficient time for management actions.

Asset Encumbrance

Asset encumbrance arises from collateral pledged against secured funding and other collateralised obligations. Due to the nature of its business the Group funds a portion of debt securities via repurchase agreements and other similar secured borrowing. Additionally debt securities and cash are provided to meet initial and variation margin requirements from central clearing counterparts and margin requirements arising from derivative and repurchase agreements.

The Group monitors the mix of secured and unsecured funding sources and seeks to efficiently utilise collateral to raise secured funding and meet other collateralised obligations. Disclosures on the asset encumbrance are shown in the tables below.

Table 26: Encumbered and Unencumbered Assets

At 31 December 2019		Encumbered assets				Unencumbered assets			
Assets		Carrying amount		Fair value		Carrying amount		Fair value	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	070	090	100
		£m	**£m**	**£m**	**£m**	**£m**	**£m**	**£m**	**£m**
010	**Assets of the reporting institution**	**12,228**				**55,568**			
020	Loans on demand								
030	Equity instruments	5,084				3,380			
040	Debt securities	3,680		3,680		1,307		1,307	
050	of which: covered bonds	-		-		-		-	
060	of which: asset-backed securities	-		-		-		-	
070	of which: issued by general governments	3,040		3,040		905		905	
080	of which: issued by financial corporations	234		234		292		292	
090	of which: issued by non- financial corporations	330		330		162		162	
100	Loans and advances other than loans on demand								
120	Other assets	3,364				50,806			
121	of which…	-				-			

At 31 December 2018		Encumbered assets				Unencumbered assets			
Assets		Carrying amount		Fair value		Carrying amount		Fair value	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	070	090	100
		£m	**£m**	**£m**	**£m**	**£m**	**£m**	**£m**	**£m**
010	**Assets of the reporting institution**	**10,483**				**49,372**			
020	Loans on demand								
030	Equity instruments	3,351				2,445			
040	Debt securities	3,655		3,655		1,344		1,344	
050	of which: covered bonds	-		-		-		-	
060	of which: asset-backed securities	-		-		380		380	
070	of which: issued by general governments	3,049		3,049		633		633	
080	of which: issued by financial corporations	408		408		298		298	
090	of which: issued by non- financial corporations	198		198		90		90	
100	Loans and advances other than loans on demand								
120	Other assets	3,536				45,149			
121	of which…	-				-			

Table 27: Collateral Received

At 31 December 2019		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
		£m	£m	£m	£m
130	**Collateral received by the reporting institution**	**48,206**		**7,253**	
140	Loans on demand	-		-	
150	Equity instruments	7,342		374	
160	Debt securities	40,864		6,873	
170	of which: covered bonds	6		0	
180	of which: asset-backed securities	1,177		827	
190	of which: issued by general governments	34,599		4,835	
200	of which: issued by financial corporations	3,564		768	
210	of which: issued by non-financial corporations	926		316	
220	Loans and advances other than loans on demand	-		-	
230	Other collateral received	-		-	
231	of which: …	-		-	
240	**Own debt securities issued other than own covered bonds or asset-backed securities**	-		-	
241	**Own covered bonds and asset-backed securities issued and not yet pledged**			-	
250	**Total assets, collateral received and own debt securities issued**	**60,434**			

At 31 December 2018		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
		£m	£m	£m	£m
130	**Collateral received by the reporting institution**	**48,648**		**6,122**	
140	Loans on demand	-		-	
150	Equity instruments	4,374		147	
160	Debt securities	41,671		5,958	
170	of which: covered bonds	29		6	
180	of which: asset-backed securities	1,121		981	
190	of which: issued by general governments	36,903		3,946	
200	of which: issued by financial corporations	2,991		618	
210	of which: issued by non-financial corporations	801		301	
220	Loans and advances other than loans on demand	-		-	
230	Other collateral received	-		-	
231	of which: …	-		-	
240	**Own debt securities issued other than own covered bonds or asset-backed securities**	-		-	
241	**Own covered bonds and asset-backed securities issued and not yet pledged**			-	
250	**Total assets, collateral received and own debt securities issued**	**59,300**			

Table 28: Encumbered Assets/Collateral Received and Associated Liabilities

At 31 December 2019		Matching liabilities, contingent liabilities or securities lent £m	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered £m
		010	030
010	Carrying amount of selected financial liabilities	50,672	39,655

At 31 December 2018		Matching liabilities, contingent liabilities or securities lent £m	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered £m
		010	030
010	Carrying amount of selected financial liabilities	49,144	41,632

Table 29: Information on Importance of Encumbrance

D - Information on importance of encumbrance
Encumbered and unencumbered assets for the Group as at 31 December 2019 are disclosed using median values. The median values are calculated as the annual median of the end-of-period values for each of the four quarters in a year. Due to the nature of business the Group sources its funds from secured market. The Group funds a significant portion of trading portfolio assets and other securities via repurchase agreements and other secured borrowing. Collateral in asset form are pledged to counterparties to support their credit exposures to the Group and to clearing brokers/houses to meet derivative initial margin requirements. The Group monitors the mix of secured and unsecured funding sources and seeks to utilise available collateral to raise funding to meet its needs. Similarly a portion of unencumbered assets may be monetised in a stress under the contingency funding plan to generate liquidity through use as collateral for secured funding or through outright sale.

Regulation

The Group assesses liquidity adequacy as part of its Internal Liquidity Adequacy Assessment Process that it submits to the PRA. The Group's compliance with prevailing regulatory liquidity requirements including the Liquidity Coverage Ratio are complemented by the internal stress testing framework. The Group manages its liquidity prudently, holding its Liquid Asset Buffer well in excess of the regulatory requirement.

12. Other Risks

Pension Risk

Pension risk is the risk that there is a shortfall in the value of the assets of the defined benefit pension scheme relative to its liabilities. The main risk is that the assets that the pension scheme holds decline significantly and there is no offsetting change in liabilities or the liabilities increase with no offsetting increase in the assets.

The Group's defined benefit pension scheme was closed to new members on 2 July 1999. The assets held are not an exact match to the liabilities. A mandatory actuarial valuation of the fund is carried out every three years for the pension trustees. The Statement of Funding Principles of the scheme requires a recovery plan to eliminate any funding deficit over the next 10 years or sooner. The scheme was closed to future accrual on 31 January 2011. This action limited the future growth of the estimated liabilities of the defined benefit scheme. The Group calculates its pension risk on an annual basis as part of its ICAAP process and holds capital to mitigate against the possibility of a material deficit in its pension fund.

Further details on the Group's pension scheme can be found in the Group's financial statements.

Business Risk

Business risk is the sensitivity between expected revenues and expected costs. It is a measure of how easily the cost base can be managed in relation to lower than expected revenues. The risk of doing business is categorised as the volatility of the business planning forecast compared to the realised revenue which is dependent on the market environment. The breadth of the business plan has increased to accommodate for Brexit.

Strategic Risk

Strategic risk is the risk of loss that may arise from the pursuit of an unsuccessful business plan including insufficient diversification of revenue sources. Strategic risk is a necessary consequence of doing business and covers a number of financial risk types. Strategic risks are generally longer term risks whereas shorter term risks will usually be captured as part of business risk. The Group's primary approach to the management of strategic risk is through its business planning processes which highlight the key dependencies of its strategy, which allows for the assessment of strategic risk at the point that the strategy is devised and agreed. The Group's programme of qualitative reverse stress testing is intended to focus on key strategic risks, identifying scenarios that could lead to their realisation as well as contingent actions that could be taken to address their emergence and mitigate the impact of the strategic risk being realised.

The Group's strategic risks also include potential impacts arising from the Group's relationship with its stakeholders and its relationship with MUFG. These risks include but are not limited to ongoing group support, maintenance of satisfactory relationships with key regulators, continued ability to meet core client demands, and the ability to attract and retain high quality staff.

Financial Risks Arising from Climate Change

Climate Change presents both risks and opportunities for the Group across its customers, business operations and wider stakeholders. The Group recognises climate change risk covers both physical risks (the impact of acute weather events and chronic changes to the climate) and transitional risks (the impact of shifts to a low-carbon economy).

The Board is responsible for the governance of risks arising from climate change with oversight delegated to the BRC. The CRO is the Senior Manager responsible for managing the risks arising from climate change, specifically through the design and implementation of the risk management framework. Given the breadth of climate change and the potential impact across the business all senior managers are responsible for managing risks arising from climate change pertinent to their part of business. The JRMC receives regular updates on the development of the broader approach to climate change risk across MUFG.

The Group's Risk Management Framework is evolving to identify measure, manage and report on financial risks arising from climate change with particular focus on governance, risk management, scenario analysis and disclosure. The Group is working with the MUFG group to develop consistent application of the disclosure recommendations from MUFG's participation in the Task-force for Climate-related Financial Disclosure (TCFD).

Model Risk

Model risk is the potential for loss arising from decisions based on incorrect or misused model outputs and reports.

The Company manages model risk by having a segregation of duties between model development and validation of the model. There are governance sub-committees and working groups that oversee the models used by the Company. In the case of risk models, the Joint Model Oversight Committee ("JMOC"), which reports to the JRMC, is responsible for reviewing the output of ongoing validation and for model performance. The Valuations Working Group ("VWG") oversees the use of pricing models. The independent validation of risk models is performed by the Model Risk Management function which is part of the Company's Enterprise Risk Management department and has membership on the JMOC and the VWG.

Compliance Risk

Compliance risk, including Financial Crime, is the risk of financial, reputational or other damage to the Group through failing to comply with regulations, rules, guidelines, professional ethics and governance standards, codes of conduct and other similar standards.

The Group maintains a governance structure designed to ensure appropriate management, oversight and second-line assurance of significant risks and associated mitigants, including, in respect of Compliance risk, a Compliance function with sufficient authority, stature, independence, resources and access to the Board. Accountability for compliance rests with functional units across the Group which own their respective compliance risks. The Compliance function is accountable for several controls and mitigants, including monitoring, testing, advising on regulatory change and compliance matters, and escalation of issues arising. The Group's compliance and internal control infrastructures evolve with changes to its risk profile, including its growth, and to the external regulatory landscape.

Conduct Risk

Conduct risk is the risk that the actions of the Group have a negative impact on customers, competition in the marketplace or market integrity and reputation. This risk can crystallise for many reasons, including compliance failures, conflicts of interest, poor culture and individual behaviour. It may negatively impact the Group's reputation leading to loss of business, or lead to regulatory sanctions.

Effective identification and management of Conduct Risk is a key aspect of the Group's future success. The Group has implemented a Conduct Risk Management Framework which identifies and manages conduct risk within a robust framework, including:

- Compliance policies and front office desk procedures
- A conduct risk operational framework supporting the continuous process of conduct risk identification and assessment
- Measures of risk appetite for the amount and type of Conduct risk that the Board are willing to accept in achieving the Group's strategic objectives and business plan
- A formal compliance monitoring programme to review the effectiveness of key controls to mitigate potential conduct risk exposure
- Production and analysis of Conduct risk management information
- Company-wide Conduct risk training and awareness programme.

Legal Risk

Legal risk is the risk of loss or damage to the firm by failing to comply with any laws, regulations or contractual obligations applicable to its business activities or failure to take appropriate steps to manage legal claims or actions.

The Group manages legal risk by compliance with all applicable laws and regulations and promoting honesty and integrity by all staff. It seeks to promote prudent business growth and profitability through the rigorous control of legal and regulatory risks in support of the wider objectives of the Group. The Group has an established permanent Legal function that is independent of business activities and has sufficient resources to carry out its role including:

- Identification of the main legal and regulatory risk issues affecting the business, recommending how these will be managed and, where appropriate, elevating residual risks to the relevant front office department, risk management department or the Board and its sub-committees.
- Identifying and advising on legal and regulatory change and its impact on the business and assisting with scoping and implementation of mitigating systems, controls and infrastructure.
- Managing legal and regulatory risk through due diligence, review of contracts and transactions including establishing legal enforceability of collateral arrangements for the Group to liquidate or take possession of collateral in a timely manner in the event of the default, insolvency, bankruptcy or other credit event of obligors, negotiation of transaction documentation and the management of all legal and regulatory actions.

Reputational Risk

Reputational risk is the risk of loss arising from reputational damage in the event that the business activities deviate substantially from the expectations and confidence of customers, shareholders, investors, society and other wide-ranging stakeholders. It is usually a secondary risk which exacerbates the loss from another risk type. The Group's business is dependent on its reputation and it will impact its performance should it deteriorate. The Group has a Reputational Risk Management policy and controls to mitigate the impact and reduce the likelihood of reputational incidents.

Such incidents can occur in any type of risk from market through to operational, or from external risks over which the Group has no direct control. The Reputational Risk Management Policy sets out how the risk of reputational events is managed.

Challenges and Uncertainties

The UK has stopped being a member of the European Union (effective 11pm, 31 January 2020) and it is clear that the political situation and hence the market outlook is somewhat uncertain. Management has been, and continues to, actively consider the impact of Brexit on the business and will manage this accordingly. Business planning has been updated to include the split of operations across the UK and European locations reflecting the expanded corporate structure. The updates to the business planning did not highlight any new key risks to be considered by the Group though this conclusion is continuously monitored. The renegotiation of legal contracts across a priority counterparty set is complete and is not considered to be a material risk area. Management is not aware of any specific issues faced by the Group that are not faced by the rest of the financial services sector within the United Kingdom as a whole, and is maintaining communication with market peers in this regard.

The London Interbank Offered Rate ("LIBOR") is expected to be phased out of use by the end of 2021. Before the end of 2021, financial services firms including MUFG will need to transition its LIBOR global business to suitable alternative rates with respect to all of its impacted client base. The transition to new products requires a significant review of transaction data, contract data and systems in order to ensure complete and effective transition of client contract arrangements. This transition process poses a number of challenges, including the development of new systems to capture new rates in the relevant timeframe and the significant work required to review and amend legal agreements. Transitioning from one benchmark rate to another may also have a significant impact on a company's financial accounting and reporting. MUFG is taking steps to migrate away from LIBOR to alternative replacement rates. MUFG has set up internal working groups, is assessing impacts and actively managing the LIBOR transition while mitigating associated risks.

The Group is exposed to fluctuations in the Japanese market through its debt issuance programme and its investment in high quality Japanese Government securities. The business activities of the ultimate parent company, MUFG, whilst carried out on a global level, are focused on the Japanese market. The downgrade of Japanese debt, interest rate volatility and associated monetary and fiscal policy decisions could impact the results of the Group. Management are fully aware of these risks and monitor them on an ongoing basis as well as ensuring appropriate levels of high quality liquid asset holdings.

13. Valuation and Accounting Policies

The financial statements of the Group as prepared in accordance with applicable International Financial Reporting Standards ("IFRS") as adopted by the European Union should be read in conjunction with this document. See footnotes to the financial statements for details of accounting and valuation principals applicable to these positions.

Trading portfolio financial assets, reverse repurchase agreements, derivative financial instruments and financial instruments measured at fair value through other comprehensive income or fair value through profit or loss are stated at fair value. The fair value of these financial instruments is the price that would be received to sell an asset or paid to transfer a liability (i.e. the exit price) in an orderly transaction between market participants at the measurement date.

The fair values of financial instruments are determined by reference to observable market prices where these are available and the market is active. Where market prices are not available or are unreliable because of poor liquidity, fair values are determined using valuation models, which where possible, use observable market parameters. The process of calculating the fair value using valuation techniques may necessitate the estimation of certain pricing parameters, assumptions or model characteristics.

The Group maintains systems and controls sufficient to provide reliable valuation estimates, including documented policies, clearly defined roles and responsibilities and departments accountable for verification that are independent of the front office. The Group makes use of various policies in the control framework for the valuation of financial instruments including but not limited to those in respect of model validation, independent price verification, provisions and valuation adjustments, P&L reporting, mark to market pricing and new products implementation.

14. Disclosures Made Available in the Financial Statements

- The definitions for accounting purposes of past due and impaired.
- Policy for hedge accounting.

15. Immaterial Disclosure Points

The following is a list of disclosure requirements that deem to be immaterial for the Group to disclose:

- Disclosures in relation to retail banking, commercial banking because the Group does not conduct those businesses.
- Indicators of global systemic importance, because the Group is not identified as Global Systemically Important Institution (G-SII).
- Non-trading book exposures in equities, because there is no equity exposure in the non-trading book other than the equity held in MUS(EU).

16. Appendix

OWN FUNDS DISCLOSURE

Table 30: Main Features of Capital Instruments

#	Features	Common Equity	Additional Tier 1 (2016 Issuance)	Additional Tier 1 (2019 Issuance)	Subordinated Loan
1	Issuer	MUFG Securities EMEA plc	MUFG Securities EMEA plc	MUFG Securities EMEA plc	MUFG Securities EMEA plc
2	Unique identifier (e.g. CUSIP, ISIN, or Bloomberg identifier for private placement)	BBG000D8HBY7	N/A	N/A	N/A
3	Governing law(s) of the instrument	English Law	English Law	English Law	English Law
	Regulatory treatment				
4	Transitional CRR III rules	Common Equity Tier 1	Tier 1	Tier 1	Tier 2
5	Post-transitional CRR rules	Common Equity Tier 1	Tier 1	Tier 1	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Common shares	Other Tier1 Instruments	Other Tier1 Instruments	Other Tier 2 Instruments
8	Amount recognised in regulatory capital (Currency in millions, as of most recent reporting date)	GBP 1,283 million	GBP 307 million	GBP 157 million	GBP 305 million
9	Nominal amount of instrument	N/A	GBP 307 million	GBP 157 million	JPY 44 billion
10	Accounting classification	Shareholders' equity	Liability	Liability	Liability
11	Original date of issuance	N/A	15/12/2016	29/11/2019	15/12/2016
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	15/12/2026
13	Original maturity date	N/A	N/A	N/A	N/A

#	Features	Common Equity	Additional Tier 1 (2016 Issuance)	Additional Tier 1 (2019 Issuance)	Subordinated Loan
14	Issuer call subject to prior supervisory approval	No	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A
	Coupons / dividends				
17	Fixed or floating dividend/coupon	N/A	Floating	Floating	Floating
18	Coupon rate and any related index	N/A	6 month GBP LIBOR + 2.3625% pa	6 month GBP LIBOR + 2.026% pa	6 month JPY LIBOR + 80bp
19	Existence of a dividend stopper	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No
22	Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-convertible	Convertible	Convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	Common Equity Tier 1 Capital Ratio falls below 7.00%	Common Equity Tier 1 Capital Ratio falls below 7.00%	N/A
25	If convertible, fully or partially	N/A	Fully	Fully	N/A
26	If convertible, conversion rate	N/A	Ordinary shares equal to aggregate principal amount divided by £1.00	Ordinary shares equal to aggregate principal amount divided by £1.00	N/A
27	If convertible, mandatory or optional conversion	N/A	Mandatory	Mandatory	N/A
28	If convertible, specify instrument type convertible into	N/A	Ordinary Shares	Ordinary Shares	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	MUFG Securities EMEA plc	MUFG Securities EMEA plc	N/A
30	Write-down feature	No	No	No	No

#	Features	Common Equity	Additional Tier 1 (2016 Issuance)	Additional Tier 1 (2019 Issuance)	Subordinated Loan
31	If write-down, write-down trigger (s)	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-down mechanism	N/A	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	The most subordinated claim	Subordinated to the claims of all senior creditors	Subordinated to the claims of all senior creditors	Subordinated to the claims of all senior creditors
36	Non-compliant transitioned features	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A

Table 31: Own Funds Disclosure Template

Own Funds		At 31 Dec 2019 £m	At 31 Dec 2018 £m
Common Equity Tier 1 capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	1,283	1,028
	of which: Instrument type 1	-	-
	of which: Instrument type 2	-	-
	of which: Instrument type 3	-	-
2	Retained earnings	296	231
3	Accumulated other comprehensive income (and any other reserves)	(2)	1
3a	Funds for general banking risk	-	-
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	-
	Public sector capital injections grandfathered until 1 January 2018	-	-
5	Minority interests (amount allowed in consolidated CET1)	-	-
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	-
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	1,577	1,260
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(57)	(61)
8	Intangible assets (net of related tax liability) (negative amount)	(77)	(55)
9	Empty set in the EU		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary difference (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	(1)	(5)
11	Fair value reserves related to gains or losses on cash flow hedges	-	-
12	Negative amounts resulting from the calculation of expected loss amounts	-	-
13	Any increase in equity that results from securitised assets (negative amount)	-	-
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	-
15	Defined-benefit pension fund assets (negative amount)	(12)	(25)
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	-	-
17	Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-
18	Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-
19	Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-
20	Empty set in the EU	-	-
20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	-
20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-
20c	of which: securitisation positions (negative amount)	-	-
20d	of which: free deliveries (negative amount)	-	-
21	Deferred tax assets arising from temporary difference (amount above 10 % threshold , net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	-
22	Amount exceeding the 15% threshold (negative amount)	-	-

Own Funds		At 31 Dec 2019 £m	At 31 Dec 2018 £m
23	of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	-
24	Empty set in the EU	-	-
25	of which: deferred tax assets arising from temporary difference	-	-
25a	Losses for the current financial year (negative amount)	-	-
25b	Foreseeable tax charges relating to CET1 items (negative amount)	-	-
26	Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment	-	-
26a	Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468	-	-
26b	Amount to be deducted from or added to Common Equity Tier 1 capital with regard to additional filters and deductions required pre CRR	-	-
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)	-	-
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(127)	(146)
29	Common Equity Tier 1 (CET1) capital	1,430	1,114
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	464	307
31	of which: classified as equity under applicable accounting standards	464	307
32	of which: classified as liabilities under applicable accounting standards	-	-
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-	-
	Public sector capital injections grandfathered until 1 January 2018	-	-
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interest not included in row 5) issued by subsidiaries and held by third parties	-	-
35	of which: instruments issued by subsidiaries subject to phase-out	-	-
36	Additional Tier 1 (AT1) capital before regulatory adjustments	464	307
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-	-
38	Holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-
40	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-
41	Regulatory adjustments applied to Additional Tier 1 capital in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase-out as prescribed in Regulation (EU) No 585/2013 (i.e. CRR residual amounts)	-	-
41a	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013	-	-
41b	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Tier 2 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013	-	-
41c	Amounts to be deducted from added to Additional Tier 1 capital with regard to additional filters and deductions required pre- CRR	-	-

Own Funds		At 31 Dec 2019 £m	At 31 Dec 2018 £m
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)	-	-
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-
44	Additional Tier 1 (AT1) capital	464	307
45	Tier 1 capital (T1 = CET1 + AT1)	1,894	1,421
Tier 2 (T2) capital: instruments and provisions			
46	Capital instruments and the related share premium accounts	305	314
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2	-	-
	Public sector capital injections grandfathered until 1 January 2018	-	-
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interest and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third party	-	-
49	of which: instruments issued by subsidiaries subject to phase-out	-	-
50	Credit risk adjustments	-	-
51	Tier 2 (T2) capital before regulatory adjustment	305	314
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	-
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institutions designed to inflate artificially the own funds of the institution (negative amount)	-	-
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10 % threshold and net of eligible short positions) (negative amount)	-	-
54a	Of which new holdings not subject to transitional arrangements	-	-
54b	Of which holdings existing before 1 January 2013 and subject to transitional arrangements	-	-
55	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amounts)	-	-
56	Regulatory adjustments applied to tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)	-	-
56a	Residual amounts deducted from Tier 2 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013	-	-
56b	Residual amounts deducted from Tier 2 capital with regard to deduction from Additional Tier 1 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013	-	-
56c	Amounts to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre- CRR	-	-
57	Total regulatory adjustments to Tier 2 (T2) capital	-	-
58	Tier 2 (T2) capital	305	314
59	Total capital (TC = T1 + T2)	2,199	1,735
59a	Risk weighted assets in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amount)	-	-
	Of which:… items not deducted from CET1 (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Deferred tax assets that rely on future profitability net of related tax liability, indirect holdings of own CET1, etc.)	-	-

Own Funds		At 31 Dec 2019 £m	At 31 Dec 2018 £m
	Of which:…items not deducted from AT1 items (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Reciprocal cross holdings in T2 instruments, direct holdings of non-significant investments in the capital of other financial sector entities, etc.)	-	-
	Items not deducted from T2 items (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Indirect holdings of own T2 instruments, indirect holdings of non-significant investments in the capital of other financial sector entities, indirect holdings of significant investments in the capital of other financial sector entities etc.)	-	-
60	Total risk-weighted assets	8,793	7,946
Capital ratios and buffers			
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	16.3%	14.0%
62	Tier 1 (as a percentage of total risk exposure amount)	21.5%	17.9%
63	Total capital (as a percentage of total risk exposure amount)	25.0%	21.8%
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements plus a systemic risk buffer, plus systemically important institution buffer expressed as a percentage of total risk exposure amount)	7.2%	6.5%
65	of which: capital conservation buffer requirement	2.500%	1.875%
66	of which: countercyclical buffer requirement	0.204%	0.105%
67	of which: systemic risk buffer requirement	n/a	n/a
67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	n/a	n/a
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	11.8%	9.5%
69	[non-relevant in EU regulation]	n/a	n/a
70	[non-relevant in EU regulation]	n/a	n/a
71	[non-relevant in EU regulation]	n/a	n/a
Amounts below the thresholds for deduction (before risk-weighting)			
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions	95	78
73	Direct and indirect holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions	-	-
74	Empty set in the EU		
75	Deferred tax assets arising from temporary difference (amount below 10 % threshold , net of related tax liability where the conditions in Article 38 (3) are met)	10	8
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	-
78	Credit risk adjustments included in T2 in respect of exposures subject to internal rating-based approach (prior to the application of the cap)	-	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase-out arrangements	-	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-
82	Current cap on AT1 instruments subject to phase-out arrangements	-	-

Own Funds		At 31 Dec 2019 £m	At 31 Dec 2018 £m
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-
84	Current cap on T2 instruments subject to phase-out arrangements	-	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-

Note: The Group has adopted the EU's regulatory transitional arrangements for IFRS 9 (Article 473a of the CRR). The own funds above have reflected the IFRS 9 transitional arrangements. The difference in own funds with and without IFRS 9 transitional arrangements is immaterial, so the own funds without the transitional arrangement are not disclosed separately.

Countercyclical capital buffer (‘CCyB’) disclosure

Table 32: Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

Level of application: Individual

At 31 December 2019		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
		010	020	030	040	050	060	070	080	090	100	110	120
Row	Country	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		
010	Australia	24.7	-	8.3	-	-	-	2.0	0.7	-	2.6	0.01	0.000%
010	Austria	-	-	4.3	-	-	-	-	0.3	-	0.3	0.00	0.000%
010	Bahrain	-	-	0.1	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Belgium	1.9	-	26.4	-	-	-	0.2	2.1	-	2.3	0.01	0.000%
010	Bermuda	25.9	-	2.0	-	-	-	2.1	0.2	-	2.2	0.01	0.000%
010	Brazil	-	-	0.2	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Canada	1.2	-	43.1	-	-	-	0.1	3.4	-	3.5	0.01	0.000%
010	Cayman Islands	140.5	-	29.4	-	-	-	11.2	2.4	-	13.6	0.04	0.000%
010	China	-	-	14.3	-	-	-	-	1.1	-	1.1	0.00	0.000%
010	Czech Republic	11.2	-	-	-	-	-	0.9	-	-	0.9	0.00	1.500%
010	Denmark	-	-	0.0	-	-	-	-	0.0	-	0.0	0.00	1.000%
010	Ecuador	-	-	5.8	-	-	-	-	0.5	-	0.5	0.00	0.000%
010	Egypt	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Finland	-	-	5.2	-	-	-	-	0.4	-	0.4	0.00	0.000%
010	France	15.3	-	170.0	-	-	-	1.2	13.6	-	14.8	0.05	0.250%
010	Germany	3.1	-	115.9	-	-	-	0.2	9.3	-	9.5	0.03	0.000%
010	Hong Kong	0.0	-	56.7	-	-	-	0.0	4.5	-	4.5	0.01	2.000%
010	Hungary	-	-	82.2	-	-	-	-	6.6	-	6.6	0.02	0.000%
010	India	77.3	-	77.7	-	-	-	6.2	6.2	-	12.4	0.04	0.000%

At 31 December 2019		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
Row	Country	010	020	030	040	050	060	070	080	090	100	110	120
		£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		
010	Ireland	165.4	-	3.8	-	-	-	13.2	0.3	-	13.5	0.04	1.000%
010	Israel	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Italy	0.0	-	5.8	-	-	-	0.0	0.5	-	0.5	0.00	0.000%
010	Japan	144.1	-	32.1	-	-	-	11.4	2.6	-	14.0	0.05	0.000%
010	Jersey	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Jordan	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	South Korea	8.3	-	9.9	-	-	-	0.7	0.8	-	1.5	0.00	0.000%
010	Luxembourg	112.7	-	24.4	-	-	-	9.0	2.0	-	11.0	0.04	0.000%
010	Malaysia	-	-	0.8	-	-	-	-	0.1	-	0.1	0.00	0.000%
010	Mauritius	24.7	-	-	-	-	-	2.0	-	-	2.0	0.01	0.000%
010	Mexico	-	-	0.2	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Netherlands	80.9	-	142.4	-	160.5	-	3.7	11.4	18.8	33.9	0.11	0.000%
010	Norway	-	-	0.9	-	-	-	-	0.1	-	0.1	0.00	2.500%
010	Oman	-	-	5.2	-	-	-	-	0.4	-	0.4	0.00	0.000%
010	Panama	-	-	1.6	-	-	-	-	0.1	-	0.1	0.00	0.000%
010	Philippines	2.6	-	-	-	-	-	0.2	-	-	0.2	0.00	0.000%
010	Portugal	-	-	0.1	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Qatar	6.0	-	3.0	-	-	-	0.2	0.2	-	0.5	0.00	0.000%

At 31 December 2019		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
Row	Country	010	020	030	040	050	060	070	080	090	100	110	120
		£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		
010	Singapore	0.3	-	0.5	-	-	-	0.0	0.0	-	0.1	0.00	0.000%
010	Spain	0.2	-	8.7	-	-	-	0.0	0.7	-	0.7	0.00	0.000%
010	Sweden	-	-	12.7	-	-	-	-	1.0	-	1.0	0.00	2.500%
010	Switzerland	0.1	-	6.8	-	-	-	0.0	0.5	-	0.5	0.00	0.000%
010	Taiwan	14.7	-	-	-	-	-	1.2	-	-	1.2	0.00	0.000%
010	Thailand	-	-	7.2	-	-	-	-	0.6	-	0.6	0.00	0.000%
010	United Arab Emirates	51.1	-	6.3	-	-	-	1.0	0.5	-	1.5	0.00	0.000%
010	United Kingdom	293.0	-	68.8	-	-	-	26.6	5.5	-	32.1	0.10	1.000%
010	United States of America	1,111.8	-	304.9	-	-	-	83.5	24.4	-	107.9	0.35	0.000%
010	Virgin Islands (British)	56.3	-	33.1	-	-	-	4.5	2.6	-	7.2	0.02	0.000%
020	Total	2,373.4	-	1,320.7	-	160.5	-	181.4	105.7	18.8	305.8	1.00	

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At 31 December 2018		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
		010	020	030	040	050	060	070	080	090	100	110	120
Row	Country	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		
010	Andorra	0.0	-	-	-	-	-	0.0	-	-	0.0	0.00	0.000%
010	Australia	0.9	-	15.2	-	-	-	0.1	1.2	-	1.3	0.01	0.000%
010	Austria	0.0	-	8.1	-	-	-	0.0	0.6	-	0.6	0.00	0.000%
010	Bahrain	-	-	0.7	-	-	-	-	0.1	-	0.1	0.00	0.000%
010	Belgium	1.9	-	92.2	-	-	-	0.2	7.4	-	7.5	0.03	0.000%
010	Bermuda	8.0	-	0.2	-	-	-	0.4	0.0	-	0.4	0.00	0.000%
010	Brazil	-	-	0.2	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Canada	2.8	-	123.6	-	-	-	0.2	9.9	-	10.1	0.04	0.000%
010	Cayman Islands	141.2	-	13.0	-	-	-	11.3	1.0	-	12.3	0.05	0.000%
010	China	-	-	6.0	-	-	-	-	0.5	-	0.5	0.00	0.000%
010	Czech Republic	-	-	1.5	-	-	-	-	0.1	-	0.1	0.00	1.000%
010	Denmark	-	-	1.2	-	-	-	-	0.1	-	0.1	0.00	0.000%
010	Finland	-	-	3.6	-	-	-	-	0.3	-	0.3	0.00	0.000%
010	France	15.0	-	127.2	-	-	-	1.2	10.2	-	11.4	0.04	0.000%
010	Germany	1.0	-	83.7	-	-	-	0.1	6.7	-	6.8	0.03	0.000%
010	Gibraltar	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Guernsey	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Hong Kong	0.2	-	4.8	-	-	-	0.0	0.4	-	0.4	0.00	1.875%
010	Hungary	-	-	45.6	-	-	-	-	3.6	-	3.6	0.01	0.000%
010	India	-	-	3.8	-	-	-	-	0.3	-	0.3	0.00	0.000%
010	Indonesia	-	-	2.0	-	-	-	-	0.2	-	0.2	0.00	0.000%

At 31 December 2018		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
Row	Country	010	020	030	040	050	060	070	080	090	100	110	120
		£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		
010	Ireland	133.4	-	52.5	-	-	-	10.7	4.2	-	14.9	0.06	0.000%
010	Italy	0.0	-	22.4	-	-	-	0.0	1.8	-	1.8	0.01	0.000%
010	Japan	113.9	-	20.3	-	-	-	8.8	1.6	-	10.5	0.04	0.000%
010	Kuwait	-	-	0.8	-	-	-	-	0.1	-	0.1	0.00	0.000%
010	Liberia	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Luxembourg	8.0	-	32.5	-	-	-	0.6	2.6	-	3.2	0.01	0.000%
010	Malaysia	-	-	5.5	-	-	-	-	0.4	-	0.4	0.00	0.000%
010	Marshall Islands	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Mauritius	10.0	-	-	-	-	-	0.8	-	-	0.8	0.00	0.000%
010	Mexico	-	-	0.0	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Morocco	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Netherlands	62.6	-	142.7	-	-	-	3.3	11.4	-	14.7	0.06	0.000%
010	New Zealand	-	-	19.5	-	-	-	-	1.6	-	1.6	0.01	0.000%
010	Norway	-	-	2.5	-	-	-	-	0.2	-	0.2	0.00	2.000%
010	Oman	-	-	0.1	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Pakistan	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Philippines	2.0	-	0.5	-	-	-	0.2	0.0	-	0.2	0.00	0.000%
010	Poland	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Portugal	-	-	0.1	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Qatar	6.5	-	-	-	-	-	0.3	-	-	0.3	0.00	0.000%
010	Saudi Arabia	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	Singapore	0.0	-	-	-	-	-	0.0	-	-	0.0	0.00	0.000%
010	South Korea	3.0	-	22.5	-	-	-	0.2	1.8	-	2.0	0.01	0.000%
010	Spain	0.0	-	18.4	-	-	-	-	1.5	-	1.5	0.01	0.000%

At 31 December 2018		General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
		Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
Row	Country	010	020	030	040	050	060	070	080	090	100	110	120
		£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		
010	Sweden	-	-	1.6	-	-	-	-	0.1	-	0.1	0.00	2.000%
010	Switzerland	0.0	-	11.1	-	-	-	0.0	0.9	-	0.9	0.00	0.000%
010	Taiwan	9.2	-	-	-	-	-	0.7	-	-	0.7	0.00	0.000%
010	Thailand	-	-	0.6	-	-	-	-	0.0	-	0.0	0.00	0.000%
010	Turkey	-	-	-	-	-	-	-	-	-	-	-	0.000%
010	United Arab Emirates	2.4	-	3.8	-	-	-	0.1	0.3	-	0.4	0.00	0.000%
010	United Kingdom	250.6	-	61.4	-	-	-	20.1	4.9	-	25.0	0.10	1.000%
010	United States of America	1,515.2	-	283.0	-	122.5	-	81.3	22.6	12.9	116.8	0.46	0.000%
010	Virgin Islands (British)	2.8	-	17.3	-	-	-	0.2	1.4	-	1.6	0.01	0.000%
020	Total	2,290.5	-	1,251.9	-	122.5	-	140.7	100.1	12.9	253.7	1.00	

Table 33: Amount of institution-specific countercyclical capital buffer

		At 31 December 2019	At 31 December 2018
		Column	Column
		010	010
Row		£m	£m
010	Total risk exposure amount	8,793	7,946
020	Institution specific countercyclical buffer rate	0.20%	0.10%
030	Institution specific countercyclical buffer requirement	18.0	8.3