

29. 09.2016

French Banking Federation response to EBA consultation paper on guidelines on disclosure requirements under Part Eight of Regulation (EU) 575/2013.

The French Banking Federation (FBF) represents the interests of the banking industry in France. Its membership is composed of all credit institutions authorized as banks and doing business in France, i.e. more than 390 commercial, cooperative and mutual banks. FBF member banks have more than 38,000 permanent branches in France. They employ 370,000 people in France and around the world, and service 48 million customers.

The FBF welcomes the opportunity to respond to the EBA consultation paper on guidelines on disclosure requirements under Part Eight of Regulation (EU) 575/2013. While we appreciate the reconciliation presented by the EBA of the revised Phase 1 Pillar 3 framework with the CRR requirements, we question the level of granularity of data required regarding usefulness of the information provided for users and regarding the costs incurring by banks to develop robust processes to collect and publish the information. We also welcome the initiative of the EBA to use the European supervisory framework – COREP and FINREP - when possible. However, market discipline disclosures refer to regulatory calculations and exposures. Although, we believe that using data based on accounting values might be confusing to users in some instances.

Finally, we are not convinced by the interpretation of the articles of the CRR retained by the EBA for requiring separate disclosure related to non-deducted insurance participation. Thus, we advocate for deleting the separate disclosure.

The paragraphs below detail our general comments, before answering to the questions raised in the Consultation Paper and commenting information required in the templates.

I. General comments

Rationale of the consultation paper should be consistent with the rationale of the CRR requirements.

Banks welcome the approach chosen by the EBA presenting how the guidelines cover the CRR articles. This approach enables to understand what the EBA and European authorities are expecting from banks regarding Pillar 3 disclosures.

However, compared to the BCBS document, the EBA consultation paper has been enriched by 16 new tables and templates. The number of tables and templates has increased by 30% to reach 56 (41 templates + 12 tables + 3 specific guidance).

In addition, in existing tables and templates new data have been required or existing data have been modified or detailed. For example, template CR1 of the BCBS document includes 16 cells to be filled in whereas, in the EBA consultation paper, the same template is split from now on in 5 templates requiring to fill more than thousand cells (among which 585 cells for the CR1-A and 286 cells for the CR1-B). The number of cells of the template CR3 to be filled in has increased from 28 to 423 cells.

Finally, we have noted a number of instances where the **proposed templates go beyond what is required within the CRR** or currently submitted as part of regulatory filings. We wish to ensure disclosures do not front-run requirements and have noted some examples for your consideration. Seven templates take into account additional information not required by the CRR, but only generated by EBA assessment (LI2, CR1A, CR1D, CR1E, CR4, CR6, CCR4).

Granularity of data should be reliable.

The increase by 30% of the number of templates and tables would require new investments in order to make substantial IT changes, to strengthen internal controls to make the disclosures internally coherent and to achieve the reliability of the assessments processes.

Risk of uneven playing field with non EU banks

If non EU banks were to apply only BCBS requirements, they would be less constrained than EU banks, both in terms of number of templates and of granularity in each template.

Format	BCBS	EBA framework aligned with CRR + EBA assessment	Variance	Variance %
Tables (flexible)	11	12	+1	
Templates (fixed)	20	26	+6*	
Templates (flexible)	9	15	+6	
Specific guidance	0	3	+3	
TOTAL	40	56	+16	+30%**

* of which templates in tables for BCBS: 4
 ** after disposal of 4 templates

Information should be meaningful to users.

We support the principle in the consultation paper, which states that disclosures should be meaningful to users. However, we question the usefulness for users (i.e. analysts, investors and other market participants) of all the high level of granularity of the proposals that is required to be disclosed. Such level prevents the readability of the information that should be disclosed to understand major risks undertaken by banks and the RWAs generated. Indeed, comments made by some users (analysts or financial observers) in response to Basel Committee consultation paper on Pillar 3, pointed out that increased granular information would not necessarily result in significant improvement of market information.

Moreover, users, with different financial knowledge might be less specialised than regulators and would not benefit of such granular information. Therefore, we encourage the EBA to provide full transparency on the way it will consider the feedback received from the users regarding their information needs.

Besides, such extended information goes against EDTF recommendations that define a set of principles to present “clear, balanced and understandable” disclosures and “relevant information”. The same five fundamental principles are recalled in the Revised Pillar 3 disclosure requirements of the BCBS, i.e. disclosures should be “clear, comprehensive, meaningful to users, consistent over time and comparable across banks”. They have been included in the EBA’s consultation paper.

Implementation date should be realistic.

We question the feasibility of the implementation dates proposed by the EBA in the guidelines. The consultation paper runs until end of September. Then, feedback received needs to be incorporated before finalising the guidelines at the end of 2016. At final stage, NCAs will need 6 additional months to answer to the question “comply or explain”. As a result, the final guidelines will be released end of June 2017. Six months will not be sufficient to implement the guidelines by the year-end of 2017.

Moreover, banks will face very significant changes in accounting requirements linked to the **IFRS9** from 1.01.2018 (and also linked to IFRS 16 and IFRS 15 under less extent). These changes will have an automatic impact on disclosure for some templates. In order to save a useless pro-forma between 31.12.2017 and 01.01.2018, we think the more reasonable approach is that implementation date for Phase I should be postponed to **December 2018**.

In addition, G-SII are recommended to apply the guidelines at 31.12.2016 on a limited number of topics (risk-weighted assets and capital requirements) representing 11 templates at pages 49-50 of the EBA draft guidelines.

From our perspective, banks should be required to provide the templates only on a **best effort basis**. The granularity of the data to be collected represents a too significant work to undertake in a very short timeframe.

Current regulatory data from COREP/FINREP should be used in an appropriate manner.

We welcome the initiative of the EBA to use the European supervisory reporting framework – COREP and FINREP - when possible. The main advantages we have identified are

- Sharing same definitions and concepts with the regulatory framework.
- Using an already existing production line of reporting which will ensure immediate quality consistency (internal controls are already in place).
- Enhancing transparency as the selected data are extracted from the ones sent to the supervisor and shared with the market.

Nevertheless, each COREP and FINREP reporting framework has its own objectives and characteristics. COREP - Common Reporting - aims to provide an overview of own funds and exposures and covers 5 components – own funds, capital adequacy ratios, credit risk, market risk and operational risk -. FINREP- Financial Reporting - intends to report accounting information based on the IFRS standards and covers balance sheet and income statement data.

Thus, some concerns worth to be raised:

- Using data based on accounting notions and risk notions would make difficult reconciliation of the data. Pillar 3 disclosures do not aim to ensure consistency between two different set of requirements that have their own rationale as mentioned above. For example, are concerned templates CR1 and CRB
- Reference to information already available in COREP or FINREP looks more like cherry picking some information scattered through different templates than using the ITS reporting data. Thus, additional internal controls need to be developed to ensure the quality of the information disclosed.

The separate disclosure related to non-deducted insurance participation should not be required.

The EBA's consultation paper proposes that financial conglomerates benefiting from an exemption decision disclose the carrying amount of their holdings of own fund instruments from insurance companies. Indeed, pursuant to Article 49(1) of the CRR, national competent authorities have granted credit institutions to not deduct their holdings of own fund instruments from insurance companies for the purposes of calculating their capital requirements, but instead risk-weight them.

The EBA refers to article 438(c) and (d) of the CRR to require a separate disclosure of the carrying amount of non-deducted insurance participations. We question whether the interpretation that the EBA retains on article 438 of the CRR is justified. Article 438 of the CRR refers to disclosure of risk-weighted amounts. We believe that article 438 of the CRR must be interpreted in a manner consistent with the other provisions of the CRR so as not to deprive any of them of their effectiveness.

Moreover, Article 437(1)(d) of the CRR provides for an exhaustive list of items that must be subject to a separate disclosure by credit institutions and does not refer to Article 49(1) of the CRR in that list. Thus, a separate disclosure regarding insurance participations which are not deducted as a consequence of using Article 49(1) is not required.

Therefore, we strongly oppose the new disclosure requirements added by the EBA as such requirements are not provided for by Article 437(1) of the CRR and as their legal basis upon which the EBA's proposal is presented (i.e., Article 438 (c) and (d) of the CRR) is inadequate since its only concerns risk-weighted exposure amounts specified in Articles 112 and 147 of the CRR and not the amounts of non-deducted insurance participations. In addition, the EBA does not demonstrate that such additional disclosure is necessary to ensure the effective and consistent application of the CRR.

We advocate for deleting the separate disclosure required related to non-deducted insurance participation.

Market risk templates should be updated after the finalization of the revision of the market risk framework.

New disclosures will be required following the revision of the market risk framework (FRTB: Fundamental review of the trading book) for the Phase 2. It would be more appropriate not to issue new templates for the Phase 1 and to wait for the finalization of the standards as:

- Adequate information on market risk is already currently disclosed
- New templates proposed do not seem to be relevant and they would not be helpful to investors.
- A new version of disclosures will be issued within 3 years. BCBS will publish the final standards for the Phase 2 at the end of 2016, with a probable adaptation deadline at European level mid 2018 aiming the implementation for 2019.

Availability of information under an editable format on institutions' website.

Issuing disclosures on institutions' website makes the process more cumbersome. Indeed, the key issue is to ensure that Pillar 3 data made available in an editable format in addition to the current format of reporting are secured and reliable. Whilst some institutions are already disclosing quantitative disclosure in an editable format, the new channel of information implies that credit institutions would have to deal with issues related to policy, protection of confidential and proprietary information and reliability and security of the data.

Therefore, we believe that banks should be allowed to freely choose the channel (website, annual report) for the public disclosure.

Frequency

Regarding quarterly templates, we question the EBA on the requirement to publish these Pillar 3 templates when the bank does not disclose its financial statements.

II. Questions for consultation

Q1. Do users prefer a comprehensive template providing a breakdown of capital requirements and RWA by exposure classes for credit risk in Template EU OV1-B, or would they prefer to have the detailed breakdown by exposure classes provided in Template EU CR5-B for the Standardised approach and Template EU CR6 for the IRB approach? (Pages 23; 80)

Template EU OV1-B provides a sufficiently comprehensive and useful breakdown of capital requirements and RWA. It is also very similar to disclosures already stipulated by the CRR. It is therefore preferable to provide the comprehensive breakdown in OV1-B than to implement it in both EU CR5-B and EU CR6 which would require significant IT investment.

Q2. Do members prefer a breakdown by exposure classes for Article 442 CRR using the granularity from COREP, the CRR or the Transparency exercise? In case users prefer a combination of the different exposure classes available in these breakdowns, please indicate the combination you would favour.

We favor a unique breakdown applied to all the templates on the basis of the breakdown of the COREP C02 template in order to avoid duplication of various formats that will be burdensome to ensure reliable reporting.

Q3. Do you believe information on the exposure-weighted average maturity by PD grade is useful for understanding of an institution's IRB RWA?

We question the relevance of an « exposure-weighted average » information as in most cases the information would not add value to the analysis of an institution's IRB RWA.

Furthermore, revealing information in a standardised exposure weighted PD vs. maturity matrix could be misleading. This is due to difference in treatment of maturity in contracts in different markets/products and due to that the maturity split between different PD grades can be volatile due to credit mitigation actions. Hence, qualitative and confidential information would be needed to be able to make a fair comparison between the banks. This is a good example when more details would create more questions than answers.

Q4. Would it be feasible to breakdown the value adjustments and provisions by PD grade for the fixed PD grade bands that are provided in the masterscale? Would this information be useful to users?

Such breakdown is feasible but it would be ad-hoc and on top of regular reporting. For some banks it would require additional work to produce this information. Moreover, the definition of the granular data to be provided should be assessed within the implementation of IFRS 9 and the subsequent changes that will be made to the reporting. Until then, no breakdown of value adjustments and provisions by PD grade should be required. As such, any disclosure in this area should be limited to describing processes rather than quantitative data.

Clarification will also be needed regarding the notion « value adjustments » in order to provide relevant information.

Q5. Is information on the sources of counterparty credit risk (breakdown by type of transactions) for exposures measured under the Internal Model Method useful for users? Should this breakdown be expanded to the other methods of computation of the exposure value?

We have concerns over the feasibility of providing this information. IMM is based on the use of probabilistic scenarios for the evolution of risk factors which are combined with pricing model outputs to determine future potential exposures. It is not feasible to attribute scenario outputs to transaction type due to their probabilistic nature and there is no practical solution to creating a meaningful breakdown.

Moreover, we have not been informed that investors have particular interest in the breakdown of sources of counterparty credit risk.

Therefore, we do not support providing information on the sources of counterparty credit risk for exposures measured under the Internal Model Method.

Q6. Is the split of credit derivatives between used for the institution's own credit portfolio and one for credit derivatives used in the institutions' intermediation activities useful or relevant to users? What definitions or policies do you currently use to identify credit derivatives used for your own portfolio, and credit derivatives used for your intermediation activities?

The split of credit derivatives between institution's own credit portfolio and intermediation activities is not required by the BCBS Revised Pillar III guidelines, neither by COREP templates. Such information is burdensome to provide. Therefore, we believe that templates regarding exposures to credit derivatives should be merged.

Q7. Which impediments, if any, including issues of availability of information, currently prevent you from disclosing the information on total (Standardised plus Internal model approaches) capital requirements by types of market risk as required under Article 445 CRR or are likely to render the disclosure of Template EU MR1-A unduly burdensome?

There is no impediment to disclose the information on capital by risk.

However, a breakdown of capital requirements under the internal model approach by market risk types is not useful for users as diversification will lead to the sum of the individual components greater than the aggregate number calculated at portfolio level. This would therefore risk confusing the investors. We ask that template MR1-A be re-designed to split information presented under Standardized approach and Internal model approach. In addition, we question the inclusion of settlement risk and large exposures in this template.

Besides, we suggest not to modify the current disclosures related to market risk until the implementation of the final revision of the market risk capital requirements (FRTB) at 2019 year-end and until its transposition into the European legal framework.

Q8. Is the separate disclosure of end of period and average values for VaR, stressed VaR, IRC and CRM useful for users?

We question the relevance of level of the details of the disclosure. We do not believe that such details to disclose would be meaningful for users, notably as they have not even been required by the recommendations of the Basel Committee.

Q9. Do you agree with the proposed scope of application of the Guidelines?

We agree with the proposed scope of application of the Guidelines. However, we believe that it is necessary to ensure that the Guidelines do not contradict Article 13 CRR that limits the scope of disclosures regarding significant subsidiaries and that enumerates articles of the CRR under which information should be provided. Indeed, article 13 CRR states that “significant subsidiaries of EU parent institutions and those subsidiaries which are of material significance for their local market shall disclose the information specified in articles 437, 438, 440, 442, 450, 451 and 453, on an individual or sub-consolidated basis”.

Regarding differentiated frequency, such as semi-annual and quarterly tables and templates, we consider that an “accompanying narrative” should not be required as it adds to an unnecessary operational burden. Furthermore, the drivers behind significant changes on a Q-o-Q or H-o-H basis could be misleading”.

Finally, as explained in our general comments, we are not convinced by the interpretation of the articles of the CRR retained by the EBA for requiring separate disclosure related to non-deducted insurance participation. Thus, we advocate for deleting the separate disclosure.

Q10. In case you support the development of key risk metric template(s) that would apply to all institutions, which area of risks and metrics would you like to be covered in such template(s)?

We support the development of key risk metric templates as it is a good step towards increased consistency. We believe that key risk metric templates from the BCBS phase 2 consultation on Pillar III or templates provided by significant subsidiaries could be a good basis to assess further metrics to be covered.

However, we note that the Basel template is still to be finalised and to ensure this standard is applied consistently globally, we believe this is something which should be consulted on after the Basel template is finalised. Affected firms would also benefit from an example template to help facilitate discussion as part of a consultation.

Q11. Do you regard making available quantitative disclosures in an editable format as feasible and useful?

Making available quantitative disclosures in an editable format should be seen as a service that institutions are willing to provide. Therefore, they should be able to decide themselves if they want to provide this service to users and to which extent.

Indeed, issuing disclosures on institutions’ website makes the process more cumbersome. The key issue is to ensure that Pillar 3 data made available in an editable format in addition to the current format of reporting are secured and reliable. Appropriate governance and additional controls over these disclosures need to be set up. Whilst some institutions are already disclosing quantitative disclosure in an editable format, the new channel of information implies that credit institutions would have to deal with issues related to policy, protection of confidential and proprietary information and reliability and security of the data.

Besides, concerning the editable format to be used, institutions should be able to freely decide the editable format that they would use to provide information on their websites.

Q12. In case you do not support making available all quantitative information specified in these Guidelines under an editable format, which subset of quantitative information should in your views be made available?

Banks should decide themselves if they want to provide this service to the users.
Please refer to question 11.

Q13. Does an early implementation of a selected set of information specified in these Guidelines appear feasible?

The final guidelines will be probably published at the end of 2016 and will be finalized after further changes will be brought to the final guidelines at the completion of the consultation process. Moreover, by that time, the NCA will not be able to notify to the EBA their compliance with the guidelines.

Banks can only start to implement new requirements once the new requirements have been finalized and once the “comply or explain” has been completed. They need sufficient time to analyze the final templates, assess them and organize themselves internally. Should also be considered the fact that Banks have already launched their works to collect and issue the year end Pillar 3 data.

Besides, we question the relevance of the early implementation of market risk templates as the current disclosures meet the expectations of the market and as the harmonization of the templates can be postponed after the application of the FRTB requirements (due at the end of 2019).

For these reasons, an early publication of the selected templates can only be envisaged on a best effort basis.

Q14. Which amendments, if any, would you bring to the selected set intended to be included in the recommendation for early application?

Banks should be free to select the templates among those proposed by EBA and possibly to adapt them, and thus in a best effort mode.
Please refer to Question 13.

Q15. Do you agree with the content of these Guidelines? In case of disagreement with specific parts of these Guidelines, please outline alternatives regarding these specific part(s) to achieve the implementation of the revised Pillar 3 framework in a fully compliant way with the current CRR requirements.

No comment.

Q16. Do you agree with the impact assessment? In case of disagreement, please identify areas where costs and benefits are misstated or suggest alternative options.

No comment

III. Template specific comments

OVA – Bank risk management approach

- Clarification should be provided to point d)

OV1-A Overview of RWA (quarterly)

OV1-B Overview of Exposure by Class (semi-annually)

- The structure of the template OV1-A and of the template OV1-B also refer to information available in COREP C07 and C08 and not only COREP C02.
- Consistency of rows numbering should be maintained between the template OV1-A and the template OV1-B, i.e. row 10 OV1-A template is missing in OV1-B template.
- Template OV1-B: we suggest that row numbers ease the understanding of the template with logical incrementing (for instance, review of the number for the equity risk lines). We propose to put the line 3c “Other non-credit-obligation assets” after line 3b11.
- Template OV1-A Row 23 : Amounts below the thresholds for deduction (subject to 250% risk-weight). The row is also required in COREP CR-SA. In order to facilitate the reconciliation with COREP template without additional adjustment, a row “of which” should be added. Moreover, we question the usefulness of this row for the users.

INS1 Non deducted participations in insurance undertakings

- As explained in our general comments, we question the justification of such disclosure. Therefore, we advocate for deleting the separate disclosure required related to non-deducted insurance participation.

LI1 Differences between accounting and regulatory scopes of consolidation

- The rows of the balance sheet will change with **IFRS9** from 1.01.2018. In order to save a useless pro-forma between 31.12.2017 and 01.01.2018 for this yearly template, we think the more reasonable approach is to postpone the first implementation to **December 2018**.
- The rows in the balance sheet related to liabilities should be removed from the template. Liabilities may only attract risk requirements where they have been subject to netting or offsetting treatment. As a result, liabilities would substantially be reported in column (g), which would be of minimal value to users.

LI2 Main sources of differences between regulatory exposure amounts and scarring values in financial statements

- The notion « regulatory exposure » is not relevant regarding Market risk and is not reported in the current COREP templates. We suggest to delete the column « Market risk framework »

LI3 Outline of the differences in the scope of consolidation – entity by entity.

- For larger organisations, providing information on every entity in the group is a significant burden in terms of size of disclosure and is disproportionate to the benefits derived by the users. A simplification of the template would be useful.

CR1 (CR1-A, CR1-B, CR1-C,) Credit quality

- The columns of the templates are based on accounting values whereas rows are based on prudential exposure classes. Thus, any reconciliation is impossible to do. We suggest retaining the COREP exposure classes for the rows, and the BCBS format for the columns (exposures of which defaulted, non-defaulted, credit risk adjustments, net values).
- The explanation of the calculation of the column « net value » ($a+a1+b+b1-c-c1-c2-c3$) is wrong and should be modified
- We suggest to delete rows « of which » of the CR1-B template (rows 43, 44, 45) and CR1-C template (row 12, 13, 14) because they are similar to those in the CR1-A template.

CR2-A Changes in stocks of general and specific credit risk adjustments

- The template incorporates broadly the data of FIN12 template and adds the exchange rate effect. Adding this metric prevents from using the FINREP data and requires complex adjustments. Therefore, we suggest deleting the mention “Impact of exchange rate differences”.
- In addition, this template will change with IFRS9 implementation from 1.01.2018. In order to save a useless pro-forma between 31.12.2017 and 01.01.2018, we think the more reasonable approach is to postpone the first implementation to December 2018.

CRB General information

- B – total and average net amount of exposures
- C – by geography
- D – by industry
- E – by maturity

The templates raise several concerns as follows:

- We suggest to reverse the templates C and D so that the same sequence than the CR1 templates is followed.
- We suggest referring to risk or COREP data only. Using the value “net carrying amount” is not appropriate as it is an accounting value and it should be substituted by exposures risk values used for COREP purposes.
- Concerning the detail of the IRBA exposures classes, the row « Other non-credit obligation assets » is missing.
- Clarification is needed concerning the rationale of column (a) template CRB-B compared to column (m) template CR1-A.
- We understand that exposures before substitution effect should be reported, while the above mentioned states require exposures after substitution effect.
- Generally speaking, increasing the number of metrics reported via numerous templates does not facilitate the good understanding of banks’ risks by users. We suggest using the metrics Exposure at Default (EAD), to insure a continuity with the other templates.
- The template CRB-B requires a monthly average information. Such information is operationally burdensome to provide. We suggest that information should be reported on a quarterly average basis to align with current quarterly disclosures required by the CRR.
- We suggest modifying the purpose of the template CRB-D: “provide a breakdown of exposures by industry and exposure classes” instead of “provide a breakdown of exposures by geographical areas and exposure classes”.

CR3 CRM overview

- We do not understand the benefit of the template for users. Besides, columns cannot be reconciled with COREP templates. Therefore we suggest amending the template so that it could be reconciled with COREP templates.

CRD Bank's use of external credit ratings under STD approach

- As cells of the template are highlighted in red, we understand that the information is redundant and therefore should not be provided. Thus, it should be clarified whereas the template is deleted.

CR4 Credit risk exposure and CRM effects

- Clarification is needed regarding linkages across templates under the template (p. 126).

CR6 IRBA – credit risk exposures by exposure class and PD range

- Should be deleted for Retail exposures, number of obligors and notion of average maturity. Maturity should not be required for retail exposures as in the CRR, maturity is not a component of the retail RW formula laid down in Article 154.

CR9 – Backtesting of probability of default (PD) per exposure class

- It needs to be clarified the link between the requirement of a « Geographical breakdown of model parameters » (p.35) with the requirement to provide back testing data. Moreover, geographical breakdown is not always relevant, as some transversal models can integrate some diversification effects between several countries.

CCR1 Counterparty credit risk exposure by approach

- PFE is not an input required for CCR exposure calculation under IMM. It is unclear how and why this should be disclosed for IMM. This is at the risk of confusing users. The breakdown by sources of CCR exposures i.e. rows 5-7 is only for those under IMM. However, this is not reflected in the template. We suggest that rows 5-7 are labelled as 'Of which' under row 4.

CCR5-A Impact of netting and collateral held on exposure values

- The section « Other information on counterparty credit risk » should be named « section C » instead of « section D ».

CCR6-A et CCR6-B Credit derivatives exposures

- The two templates are split between proprietary activities and banking intermediation activities. The data are complicated to provide and are not required in the COREP templates. We suggest merging the two templates.

CCR8 Exposures to central counterparties

- It should be noticed that only the aggregation of the rows 3, 4, 13 and 14 and 5 and 15 could be reconciled with COREP.

MR1-A Market risk own funds requirements

- We question the usefulness of the template for users notably as it is not meaningful or useful for investors to have aggregate values of RWA and capital requirements for the whole market risk portfolio, i.e. both standardized and internal models approach. The sum of individual components at market risk type level under internal model approaches will not reconcile to the total portfolio level calculation due to the recognition of diversification and hedging benefits. In other words, the sum of rows 1 – 6 would not reconcile to row 7 for both 'RWA' and 'Capital requirements'

We suggest to change the titles of the following templates:

OV1-B Overview of Exposure by Class

- New title: Overview of RWA by exposure class.

CR5 Standardised approach -

- New title: Standardised approach –exposure by exposure class and risk weight.

CCR3 Standardised approach – CCR exposure by regulatory portfolio and risk

- New title: Standardised approach – CCR exposure by exposure class and risk weight.

CCR4 IRB – CCR exposure by portfolio and PD scale

- New title: IRBA – CCR exposures by exposure class and PD range.