CAPITAL ADEQUACY INFORMATION OF BNP PARIBAS BANK POLSKA S.A. CAPITAL GROUP AS OF 30 SEPTEMBER 2019

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1. INTRODUCTION

In accordance with the Regulation of the European Parliament and of the Council (EU) No 575/2013 as of 26 June 2013 on prudential requirements for credit institutions and investment firms, amending Regulation (EU) No 648/2012 (Acts. Office. EU. L No. 176, p. 1), hereinafter referred to as "Regulation (EU) No 575/2013", BNP Paribas Bank Polska S.A. with its registered office in Warsaw, hereinafter referred to as "Bank", is obliged to publish in a publicly accessible manner information about the qualitative and quantitative adequacy of the capital excluding irrelevant information, proprietary or confidential.

According to the art. 433 of Regulation (EU) No 575/2013, the Bank publishes at least annually, the disclosures of which is required by virtue of Part Eight of Regulation (EU) No 575/2013. Pursuant to the obligation specified in article 13 of the Regulation (EU) No 575/2013, Bank publicly discloses as defined in art. 437, 438, 440, 442, 450, 451 and 453 the information based on data available at the highest, national level of consolidation for prudential purposes. In addition, Bank discloses information on unencumbered assets based on art. 443 of Regulation (EU) No 575/2013.

In the light of the scale and relevant characteristics of Bank's business and taking into account0020European Banking Authority Guidelines on disclosure requirements under Part Eight of Regulation (EU) No 575/2013 - *EBA/GL/2016/11*, the Bank discloses quarterly some information regarding capital adequacy and pay particular attention to the possible need for more frequent disclosure of items of information laid down in Article 437, and points (c) to (f) of Article 438 of Regulation (EU) No 575/2013, and information on risk exposure and other items prone to rapid change.

This document provides information on the capital adequacy of the BNP Paribas Bank Polska S.A. Capital Group as of 30 September 2019.

OWN FUNDS

Based on the art.437 of the Regulation (EU) No 575/2013 the Bank discloses full reconciliation of own funds items in relation to the financial statements.

Table 1. Full reconciliation of own funds items in relation to the financial statements as of 30 September 2019

					[k. PLN]
POSITIONS OF THE CONSOLIDATED FINANCIAL STATEMENT USED FOR	Positions on 30 September	Correction for companies not subject to prudential		Part of the unrecognized	OWN FUNDS
THE CALCULATION OF OWN FUNDS Assets	2019	consolidation	Filters	annual profit	POSITIONS
Intangible assets	490 969	334	-	-	490 635
Deferred tax assets net of related tax					
liability	1 028 678	15 126	81 298	-	932 254
Liabilities					
Subordinated liabilities	1 920 534	-			1 920 534
- including subordinated loans recognized		-	-	-	
as instruments in Tier II	1 916 291				1 916 291
Core capital					
Common Shares	147 419	-	-	-	147 419
Other capital instruments, including:	10 683 734	-	-	-	10 683 734
- share premium accounts	7 259 316	-	-	-	7 259 316
- general risk fund	627 154	-	-	-	627 154
- reserve capital	2 797 264	-	-	-	2 797 264
revaluation reserve, including:	133 423	-	-	-	133 423
Result of the current year	493 423	15 310		101 898	376 215

Bank discloses own funds structure together with regulatory adjustments to Tier I and Tier II capital.

Table 2. The own funds structure with regulatory adjustments as of 30 September 2019

No.*		AMOUNT AT DISCLOSURE DATE (k. PLN)	REGULATION (EU) No 575/2013 ARTICLE REFERENCE
Comr	non Equity Tier I capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	7 406 735	26 (1), 27, 28, 29, EBA list 26 (3)
	Of which: common shares	147 419	EBA list 26 (3)
2	Retained earnings	- 58 225	26 (1) (c)
3	Accumulated other comprehensive income (and other reserves, to include unrealized gains and losses under the applicable accounting standards)	2 930 686	26 (1)
3a	Funds for general banking risk	627 154	26 (1) (f)
6	Common Equity Tier I (CET1) capital before regulatory adjustments	10 906 350	
Comr	non Equity Tier I (CET1) capital: regulatory adjustments		
28	Total regulatory adjustments to Common Equity Tier I (CET1)	-162 857	
29	Common Equity Tier I (CET1) capital	10 743 493	
44	Additional Tier I (AT1) capital		
45	Tier I capital (T1 = CET1 + AT1)	10 743 493	
Tier II	(T2) capital: instruments and provisions		
58	Tier II (T2) capital	1 916 291	
59	Total capital (TC = T1 + T2)	12 659 783	
60	Total risk weighted assets	84 057 112	
Capit	al ratios and buffers		
61	Common Equity Tier I (as a percentage of risk exposure amount)	12,78%	92 (2) (a)
62	Tier I (as a percentage of risk exposure amount)	12,78%	92 (2) (b)
63	Total capital (as a percentage of risk exposure amount) Institution specific buffer requirement (CET1 requirement in accordance with article 92(1)(a) plus capital conservation and countercyclical buffer	15,06%	92 (2) (c)
64	requirements, plus systematic important institution buffer expressed as a percentage of risk amount)	5,750%	CRD 128, 129, 130
65	of which: capital conservation buffer requirement	2,500%	
66	of which: countercyclical buffer requirement	0,000%	
67	of which: systematic risk buffer requirement	3,000%	
67a	of which: Global Systematically Important Institution (G-SII) or Other Systematically Important Institution (O-SII) buffer	0,250%	CRD 131
68	Common Equity Tier I available to meet buffers (as a percentage of risk exposure amount)	5,75%	CRD 128
Amo	unts below the threshold (before risk weighting)		
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	1 027 899	36 (1) (c), 38, 48, 470, 472 (5)



3. CAPITAL REQUIREMENTS

According to art. 438 of the Regulation (EU) No 575/2013, the Bank is publishing overview of risk weighted assets and amounts representing 8% of the risk-weighted exposure, separately for each exposure class, which are presented in table below.

Table 3. Risk weighted assets overview as of 30 September 2019

Note					Capital
[k. PLN] 2019 2019 2019 1 Credit risk 73 058 432 71 629 085 5 844 675 2 Of which standardised approach 73 058 432 71 629 085 5 844 675 4 Of which advanced IRB approach - - - - 5 Of which equity positions under the simple risk-weighted approach - - - 6 Counterparty Credit Risk 1 689 838 1 366 081 135 187 7 Of which mark-to-market 1 403 169 1 082 631 112 253 10 Of which intermal model method (IMM) - - - - 11 Of which CCP - default fund contributions - 28 670 283 450 22 934 14 Securitisation exposures in the banking book - - - - 15 Of which IRB approach (IRB) - - - - 16 Of which IRB supervisory formula approach (SFA) - - - - 17 Of which standardised approach			RW	'As	requirements
1 Credit risk 73 058 432 71 629 085 5 844 675 2 Of which standardised approach 73 058 432 71 629 085 5 844 675 4 Of which advanced IRB approach - - - 5 Of which equity positions under the simple risk-weighted approach - - - 6 Counterparty Credit Risk 1 689 838 1 366 081 135 187 7 Of which mark-to-market 1 403 169 1 082 631 112 253 10 Of which internal model method (IMM) - - - - 11 Of which CCP - default fund contributions - - - - - 12 Of which CVA 286 670 283 450 22 934 14 Securitisation exposures in the banking book - - - - 15 Of which IRB approach (IRB) - - - - 16 Of which Baspervisory formula approach (SFA) - - - - 16 Of which internal assessmen			30 September	30 June	30 September
2 Of which standardised approach 73 058 432 71 629 085 5 844 675 4 Of which advanced IRB approach - - - - 5 Of which equity positions under the simple risk-weighted approach - - - - 6 Counterparty Credit Risk 1 689 838 1 366 081 135 187 7 Of which mark-to-market 1 403 169 1 082 631 112 253 10 Of which internal model method (IMM) - - - - 10 Of which CCP - default fund contributions - - - - - 12 Of which CVA 286 670 283 450 22 934 44 Securitisation exposures in the banking book - - - - 15 Of which IRB approach (IRB) - - - - 16 Of which IRB supervisory formula approach (SFA) - - - - 16 Of which standardised approach 1 367 333 919 841 109 387 </td <td>[k. F</td> <td>PLNJ</td> <td>2019</td> <td>2019</td> <td>2019</td>	[k. F	PLNJ	2019	2019	2019
4 Of which advanced IRB approach - <td< td=""><td>1</td><td>Credit risk</td><td>73 058 432</td><td>71 629 085</td><td>5 844 675</td></td<>	1	Credit risk	73 058 432	71 629 085	5 844 675
5 Of which equity positions under the simple risk-weighted approach - - - 6 Counterparty Credit Risk 1 689 838 1 366 081 135 187 7 Of which mark-to-market 1 403 169 1 082 631 112 253 10 Of which internal model method (IMM) - - - - 11 Of which CCP - default fund contributions - - - - 12 Of which CVA 286 670 283 450 22 934 44 Securitisation exposures in the banking book - - - - - 15 Of which IRB approach (IRB) - - - - - 16 Of which IRB supervisory formula approach (SFA) - - - - 17 Of which standardised approach 1 367 333 919 841 109 387 18 Of which standardised approach 1 367 333 919 841 109 387 20 Of which IMA - - - -	2	Of which standardised approach	73 058 432	71 629 085	5 844 675
6 Counterparty Credit Risk 1 689 838 1 366 081 135 187 7 Of which mark-to-market 1 403 169 1 082 631 112 253 10 Of which internal model method (IMM)	4		-	-	-
7 Of which mark-to-market 1 403 169 1 082 631 112 253 10 Of which internal model method (IMM) - - - 11 Of which CCP - default fund contributions - - - 12 Of which CVA 286 670 283 450 22 934 14 Securitisation exposures in the banking book - - - - 15 Of which IRB approach (IRB) - - - - 16 Of which IRB supervisory formula approach (SFA) - - - - 17 Of which internal assessment approach (IAA) - - - - 18 Of which standardised approach - - - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - - 23 Operational risk 7 941 509 7 941 509 <td< td=""><td>5</td><td>Of which equity positions under the simple risk-weighted approach</td><td>-</td><td>-</td><td>-</td></td<>	5	Of which equity positions under the simple risk-weighted approach	-	-	-
10 Of which internal model method (IMM)	6	Counterparty Credit Risk	1 689 838	1 366 081	135 187
11 Of which CCP - default fund contributions - - - 12 Of which CVA 286 670 283 450 22 934 14 Securitisation exposures in the banking book 15 Of which IRB approach (IRB) - - - 16 Of which IRB supervisory formula approach (SFA) - - - 17 Of which internal assessment approach (IAA) - - - 18 Of which standardised approach - - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - - Amounts below the thresholds for deduction (subject to	7	Of which mark-to-market	1 403 169	1 082 631	112 253
12 Of which CVA 286 670 283 450 22 934 14 Securitisation exposures in the banking book 15 Of which IRB approach (IRB) - - - 16 Of which IRB supervisory formula approach (SFA) - - - - 17 Of which internal assessment approach (IAA) - - - - - 18 Of which standardised approach -	10	Of which internal model method (IMM)	-	-	-
14 Securitisation exposures in the banking book 15 Of which IRB approach (IRB) - - - 16 Of which IRB supervisory formula approach (SFA) - - - 17 Of which internal assessment approach (IAA) - - - 18 Of which standardised approach - - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% - - - - 27 risk weight) - - - - -	11	Of which CCP - default fund contributions	-	-	-
15 Of which IRB approach (IRB) - - - 16 Of which IRB supervisory formula approach (SFA) - - - 17 Of which internal assessment approach (IAA) - - - 18 Of which standardised approach - - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% - - - - 27 risk weight) - - - - -	12	Of which CVA	286 670	283 450	22 934
16 Of which IRB supervisory formula approach (SFA) - - - 17 Of which internal assessment approach (IAA) - - - 18 Of which standardised approach - - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% 27 risk weight) - - - -	14	Securitisation exposures in the banking book			
17 Of which internal assessment approach (IAA) - - - 18 Of which standardised approach - - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% - - - - 27 risk weight) - - - - - -	15		-	-	-
18 Of which standardised approach - - 19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% 27 risk weight) - - - -	16	Of which IRB supervisory formula approach (SFA)	-	-	-
19 Market risk 1 367 333 919 841 109 387 20 Of which standardised approach 1 367 333 919 841 109 387 21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% - - - - 27 risk weight) - - - - - -	17	Of which internal assessment approach (IAA)	-	-	-
20 Of which standardised approach 21 Of which IMA 22 Operational risk 23 Operational risk 26 Of which basic indicator approach 27 Of which standardised approach 28 Of which standardised approach 29 Of which standardised approach 20 Of which advanced measurement approach (AMA) 20 Of which standardised approach 21 Of which standardised approach 22 Of which standardised approach 23 Of which standardised approach 24 Of which standardised approach 25 Of which advanced measurement approach (AMA) 26 Of which advanced measurement approach (AMA) 27 risk weight) 28 Of which standardised approach 28 Of which standardised approach 38 Of which standardised approach 39 Of which standardised approach 30 Of which standardised approach 30 Of which standardised approach 30 Of which standardised approach 31 Of which standardised approach 32 Of which standardised approach 33 Of which standardised approach 34 Of which standardised approach 35 Of which standardised approach 36 Of which standardised approach 37 Of which standardised approach 38 Of which standardised approach 38 Of which standardised approach 38 Of which standardised approach 39 Of which standardised approach 30 Of which standardised approach 31 Of which standardised approach 32 Of which standardised approach 31 Of which standardised approach 32 Of which standardised approach 33 Of which standardised approach 34 Of which standardised approach 35 Of which standardised approach 36 Of which standardised approach 37 Of which standardised approach 38 Of which standardised approach 38 Of which standardised approach 39 Of which standardised approach 30 Of which standardised	18	Of which standardised approach	-	-	-
21 Of which IMA - - - 23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% 27 risk weight) - - - -	19	Market risk	1 367 333	919 841	109 387
23 Operational risk 7 941 509 7 941 509 635 321 24 Of which basic indicator approach 151 797 151 797 12 144 25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) - - - Amounts below the thresholds for deduction (subject to 250% - - - - 27 risk weight) - - - - -	20	Of which standardised approach	1 367 333	919 841	109 387
24 Of which basic indicator approach 25 Of which standardised approach 26 Of which advanced measurement approach (AMA) 27 Amounts below the thresholds for deduction (subject to 250% 28 risk weight) 29 Tisk weight	21	Of which IMA	-	-	-
25 Of which standardised approach 7 789 712 7 789 712 623 177 26 Of which advanced measurement approach (AMA) Amounts below the thresholds for deduction (subject to 250% 27 risk weight)	23	Operational risk	7 941 509	7 941 509	635 321
26 Of which advanced measurement approach (AMA) Amounts below the thresholds for deduction (subject to 250% 27 risk weight)	24	Of which basic indicator approach	151 797	151 797	12 144
Amounts below the thresholds for deduction (subject to 250% 27 risk weight)	25	Of which standardised approach	7 789 712	7 789 712	623 177
27 risk weight)	26	Of which advanced measurement approach (AMA)	-	-	-
29 TOTAL 84 057 112 81 856 516 6 724 569	27	risk weight)	<u>-</u>	-	-
	29	TOTAL	84 057 112	81 856 516	6 724 569

4. LEVEREGE RISK

The Bank discloses some information on its leverage ratio based on Commission Implementing Regulation (EU) 2016/200 of 15 February 2016 laying down implementing technical standards with regards to disclosure of the leverage ratio of institutions according to art. 451 of the Regulation (EU) No 575/2013 (Acts. Office. EU. Series L No. 39, p. 5) with later D.

The calculation of leverage ratio of the Bank Capital Group as of 30 September 2019 was made under the provisions of Commission Delegated Regulation (EU) 2015/62 as of 10 October 2014 amending Regulation (EU) No 575/2013 in respect of the leverage ratio (Acts. Office. EU. Series L No. 309, p. 5), hereinafter referred to as "Delegated Regulation 2015/62.". According to the Delegated Regulation 2015/62 financial leverage ratio is expressed as a percentage of the value of the quotient of Tier I capital and total exposure measure by the end of the reporting period, while total exposure measure is the sum of the exposure values determined under all of the assets and off-balance items not deducted when determining the capital measure Tier I.

Table 4. Leverage Ratio

Reference date	30 September 2019			
Entity name	BNP Paribas Bank Polska S.A.			
Level of application	consolidated			

Table 5. Summary reconciliation of accounting assets and leverage ratio exposures as of 30 September 2019

Applicable Amount in k. PLN Total assets as per published financial statements 105 637 301 Adjustment for entities which are consolidated for accounting purposes but are outside 2 the scope of regulatory consolidation (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure 3 measure in accordance with Article 429(13) of Regulation (EU) No 575/2013) 2 784 711 4 Adjustments for derivative financial instruments 5 Adjustment for securities financing transactions (SFTs) Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of 6 off-balance sheet exposures) 10 228 284 (Adjustment for intragroup exposures excluded from the leverage ratio total exposure EU-6a measure in accordance with Article 429(7) of Regulation (EU) No 575/2013) (Adjustment for exposures excluded from the leverage ratio total exposure measure in EU-6b accordance with Article 429(14) of Regulation (EU) No 575/2013) Other adjustments 8 Leverage ratio total exposure measure 118 650 296

Table 6. Leverage ratio common disclosure as of 30 September 2019

CRR leverage ratio exposures in k. PLN Capital and total exposure measure 20 Tier I capital 10 743 493 Leverage ratio total exposure measure (sum of lines 3, 11, 16, 19, EU-19a and EU-19b) 118 650 296 Leverage ratio 9.05% Choice on transitional arrangements and amount of derecognised fiduciary items Choice on transitional arrangements for the definition of the capital measure transitional Amount of derecognized fiduciary items in accordance with Article 429(11) of EU-24 Regulation (EU) No 575/2013



5. COMPARISON OF BANK'S OWN FUNDS AND CAPITAL AND LEVERAGE RATIOS WITH AND WITHOUT THE APPLICATION OF TRANSITIONAL ARRANGEMETS FOR IFRS 9 OR ANALOGOUS ECLS

In accordance with the Regulation of the European Parliament and of the Council (EU) No 2017/2395 of 12 December 2017 amending Regulation (EU) No 575/2013 as regards transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds and for the large exposures treatment of certain public sector exposures denominated in the domestic currency of any Member State, the Bank discloses the amounts of own funds, Common Equity Tier 1 capital and Tier 1 capital, the Common Equity Tier 1 capital ratio, the Tier 1 capital ratio, the total capital ratio and the leverage ratio the Bank would have in case the Bank was not to apply the art. 1 of this Regulation.

Table 7. Comparison of Banks' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs as of 30 September 2019

				[k. PLN]	
		30 September	30 June	31 March	
		2019	2019	2019	2018
	Available capital (amounts)				
1	Common Equity Tier I (CET1) capital	10 743 493	10 509 699	10 295 741	10 334 299
	Common Equity Tier I (CET1) capital as if IFRS 9 or				
	analogous ECLs transitional arrangements had not been				
2	applied	10 402 825	10 169 031	9 955 073	9 953 553
3	Tier I capital	10 743 493	10 509 699	10 295 741	10 334 299
	Tier I capital as if IFRS 9 or analogous ECLs transitional				
4	arrangements had not been applied	10 402 825	10 169 031	9 955 073	9 953 553
5	Total capital	12 659 783	12 374 929	12 173 696	12 206 789
	Total capital as if IFRS 9 or analogous ECLs transitional				
6	arrangements had not been applied	12 319 116	12 034 261	11 833 028	11 826 043
	Risk-weighted assets (amounts)				
7	Total risk-weighted assets	84 057 112	81 856 516	83 554 734	83 451 281
	Total risk-weighted assets as if IFRS 9 or analogous ECLs				
8	transitional arrangements had not been applied	83 910 623	81 711 565	83 410 597	83 050 515
	Capital ratios				
9	Tier I (as a percentage of risk exposure amount)	12,78%	12,84%	12,32%	12,38%
	Common Equity Tier I (as a percentage of risk exposure				
	amount) as if IFRS 9 or analogous ECLs transitional				
10	arrangements had not been applied	12,40%	12,45%	11,94%	11,98%
11	Tier I (as a percentage of risk exposure amount)	12,78%	12,84%	12,32%	12,38%
	Tier I (as a percentage of risk exposure amount) as if IFRS 9				
	or analogous ECLs transitional arrangements had not been				
12	11	12,40%	12,45%	11,94%	11,98%
13	Total capital (as a percentage of risk exposure amount)	15,06%	15,12%	14,57%	14,63%
	Total capital (as a percentage of risk exposure amount) as if				
	IFRS 9 or analogous ECLs transitional arrangements had not				
14	been applied	14,68%	14,73%	14,19%	14,24%
	Leverage ratio				
15	Leverage ratio total exposure measure	118 650 296	116 833 282	119 057 168	116 882 561
16	Leverage ratio	9,05%	9,00%	8,65%	8,84%
	Leverage ratio as if IFRS 9 or analogous ECLs transitional				
17	arrangements had not been applied	8,77%	8,70%	8,36%	8,52%