



**Dell Bank International d.a.c.**

**Pillar III Disclosures**

**31 December 2017**

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## 1. Overview

### 1.1 Principal Activities

Dell Bank International d.a.c. (“the Bank”, “Dell Bank”) was incorporated on 15 August 2011. The Bank’s immediate parent undertaking is DFS BV (“DFS BV”), a company incorporated in the Netherlands, and the Bank’s ultimate parent undertaking is Dell Technologies Inc. (formerly Denali Holdings Inc.) (“Dell Inc.”), a private company incorporated in the United States of America. On 18 October 2017, Dell Inc. purchased 100% ownership (capital and voting rights) of DFS BV, the immediate parent of Dell Bank from Dell Global B.V. As a result of this transaction Dell Inc. became the 100% direct shareholder and owner of capital and voting rights of DFS BV. Dell Inc. continues to be an indirect shareholder of Dell Bank and continues to own (indirectly) 100% capital and voting rights in Dell Bank.

The principal activity of the Bank is the provision of financing solutions to end users of products and services sold by Dell / EMC and all by VMWare entities in Europe. This includes lease and loan arrangements, rentals and asset management facilities to all Dell business segments and to third party providers.

The Bank is regulated by the Central Bank of Ireland (“CBI”) and has an Irish banking licence under the Central Bank of Ireland Act 1971 (as amended). The Bank is subject to the CBI’s Corporate Governance Code for Credit Institutions and Insurance Undertakings 2015 which imposes minimum core standards on all credit institutions licensed by the CBI. The Bank is not required to comply with the additional Corporate Governance Code requirements for High Impact designated institutions.

On the 7 September 2016 Dell Inc. completed the acquisition of EMC Corporation forming a new entity named Dell Technologies Inc. The transaction also comprised EMC’s wholly and partially owned subsidiaries including VMWare. The Bank began offering financing solutions in relation to EMC assets from September 2016.

During the year ended 31 December 2016 the Bank executed legal contracts for a securitisation transaction. A Special Purpose Vehicle, Dell Receivables Financing 2016 Designated Activity Company (d.a.c) (the “SPV”) was incorporated on 9 September 2016 as part of this securitization structure. The SPV is a “qualifying company” as defined in Section 110 of the Taxes Consolidation Act 1997. The Bank began selling eligible receivables to the SPV from the 1 January 2017 and will continue to do so on a revolving basis. The SPV is funded by a senior loan facility provided by a number of external banks and by a junior loan facility provided by the Bank. Operationally the Bank remains responsible for the credit management, servicing, collection, and administration of these assets (including receivables) under a Servicing Agreement between the Bank and the SPV. The Bank retains the credit risk associated with the receivables.

In addition the bank completed a number of syndicated receivable transactions during the year.

The Bank continues to closely monitor any impacts arising from the UK’s decision to trigger Article 50 and withdraw from the EU (“Brexit”), including foreign exchange rates and interest rates. The Bank has contingency plans in place to continue to operate in the UK post Brexit and stands ready to implement its contingency plans to ensure minimal disruption to its UK operations.

## 1.2 Capital Requirements Regulation & European Directives

The Capital Requirements Directive (CRD) and the Capital Requirements Regulation (CRR) were published by the European Banking Authority (EBA) on 27 June 2013 (Collectively known as “CRD IV”). The CRR had direct effect in EU member states and CRD was required to be implemented through national legislation in EU member states by 31 December 2013. The CRD IV legislation is being implemented on a phased basis from 1 January 2014. While the majority of transitional provisions will be fully implemented from 1 January 2019, the provisions in relation to the grandfathering of capital items and the deduction of deferred tax assets will not be fully implemented until 1 January 2022, and 1 January 2024 respectively.

CRD and CRR effectively transposed the Basel III accord into law. The Basel III accord is made up of three Pillars.

- *Pillar I* (“minimum capital requirements”) sets out the regulatory prescribed rules for calculating the minimum capital requirements covering credit risk, operational risk and market risk along with set criteria for calculating the minimum Liquid Assets and Stable Funding requirements based on inflow/outflows and maturity mismatches.
- *Pillar II* (“supervisory review”) requires banks to have in place an Internal Capital Adequacy Assessment Process (“ICAAP”), under which banks calculate their own estimate of the capital requirements to cover all material risks and an Internal Liquidity Adequacy Assessment Process (“ILAAP”), under which banks calculate their own estimate of short term liquidity requirements and longer term funding requirements to achieve strategic objectives. The ICAAP and ILAAP are forward looking and assess capital and liquidity adequacy under base and stress scenarios. The institution’s ICAAP and ILAAP are subject to the Supervisory Review and Evaluation Process (SREP).
- *Pillar III* (“market discipline”) requires disclosure to the market of certain qualitative and quantitative information relating to an institution’s risk profile and risk management processes.

This document presents the Bank’s Pillar III disclosures as at 31 December 2017 as required by Article 13 of the Capital Requirements Regulation (“CRR”).

## 1.3 Distinction between IFRS and Pillar III Quantitative Disclosures

It should be noted that there are fundamental differences in the basis of calculation between financial statement information based on IFRS accounting standards and Basel Pillar I information based on regulatory capital adequacy concepts and rules. While some of the Pillar 3 quantitative disclosures based on Basel methodologies may be comparable with quantitative disclosures in the Annual Report 31 December 2017 in terms of disclosure topic covered, any comparison should bear the differences relating to the scope of application and calculations in mind.

The disclosures contained in this document have not been subject to external audit.

## 1.4 Scope of Application

The Bank's regulatory banking licence requires both Dell Bank International d.a.c (solo basis<sup>1</sup>) and the Parent Company, DFS BV, (Consolidated basis) to file regulatory returns with the Central Bank for the purpose of assessing, inter alia, their capital adequacy and balance sheets. In line with CRR requirements under Article 13(2), the risk based figures provided in the tables contained within the document are derived from the year end consolidated COREP returns that were submitted to the Central Bank of Ireland.

The audited consolidated Financial Statements are presented for Dell Bank International d.a.c (solo basis) and therefore the scope of application differs to the Pillar III requirements.

DFS BV's sole purpose is to act as a holding company for the Bank. Therefore to reflect the risk profile of the Bank the qualitative information below has been presented on a solo basis.

On 14 December 2016, EBA published Guidelines on disclosure requirements under Part Eight of Regulation (EU) No 575/2013. These guidelines have set out prescriptive requirements for disclosing both qualitative and quantitative data. While these guidelines apply to all Global Systemically Important Institutions (G-SII's) and Other Systemically Important Institutions (O-SII's), the Central Bank of Ireland has requested that all Less Significant Institutions also comply in full with the requirements. As a result of this directive, changes have been made to both content and format of this document. The EBA prescriptive templates for quantitative data can be found in the Appendices while the pertinent data is contained within the body of the document. Where possible, comparatives to 2016 have also been included.

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<sup>1</sup> For regulatory purposes, the solo basis includes Dell Receivables Financing 2016 d.a.c.

## 2. Own funds and capital management

### 2.1 Capital Resources

During 2017 the Bank was predominantly funded by capital (comprising share capital, capital contribution, subordinated debt and reserves), a collateralised loan facility, a securitised senior loan facility and an intercompany loan from Dell Global BV (DGBV) a fellow subsidiary of Dell Inc. Dell Inc. has provided and will continue to provide, funding to the Bank (subject to any legal or regulatory requirements), to the extent that the Bank:

- Is not otherwise able to comply with the capital and/or liquidity requirements of CRD IV or the requirements set out by the Central Bank of Ireland, or,
- Requires funding to meet any business or lending commitment as and when they fall due.

The Bank received a capital contribution of €25million from Dell Inc. in November 2017.

The following table sets out the Own Funds of the Bank (see Appendix 1 for EBA disclosure templates including nature and amounts of the prudential filters<sup>2</sup> and Appendix 3 for a reconciliation of the own funds).

| <b>Regulatory Capital</b><br><i>In thousands of Euro</i> | <b>2017</b>      | <b>2016</b>      |
|--|------------------|------------------|
| <b>Tier 1 Capital</b>                                    |                  |                  |
| Share Capital  | 50,018           | 50,018           |
| Capital Contribution                                     | 342,500          | 317,500          |
| Goodwill   | (13,226)         | (13,226)         |
| Intangible Assets  | (10,611)         | (14,836)         |
| Deferred Taxation Assets <sup>3</sup>                    | (3,250)          | (3,658)          |
| Reserves   | (66,505)         | (71,935)         |
| <b>Common Equity Tier 1</b>                              | <b>298,926</b>   | <b>263,863</b>   |
| <b>Additional Tier 1</b>                                 | -                | -                |
| <b>Total Tier 1 Capital</b>                              | <b>298,926</b>   | <b>263,863</b>   |
| <b>Tier 2</b>  |                  |                  |
| Subordinated Debt  | 65,000           | 65,000           |
| IBNR Provisions  | 1,142            | 1,282            |
| <b>Total Tier 2 Capital</b>                              | <b>66,142</b>    | <b>66,282</b>    |
| <b>Total Own Funds</b>                                   | <b>365,068</b>   | <b>330,145</b>   |
| <b>Risk Weighted Assets</b>                              | <b>1,471,868</b> | <b>1,015,732</b> |
| <b>Total Capital Ratio</b>                               | <b>24.80%</b>    | <b>32.50%</b>    |

<sup>2</sup> Prudential Filters under article 36 of the CRR are; losses for the current year, intangible assets and goodwill.

<sup>3</sup> Under the CBI 'Implementation of Competent Authority Discretions and Options in CRD IV and CRR', Section 2 Transitional Arrangements, Deferred Taxation Assets that do not rely on temporary differences are being phased in as deductions from Own Funds.

## 2.2 Capital Instruments

The subordinated Loan entered into in June 2013 bears interest at rates fixed in advance for periods of three months. The Bank's dated subordinated notes are repayable in 2023 in full. The Bank has not had any defaults of principal, interest or other breaches with respect to its liabilities during the year. The loan is subordinated to other debt held. The Bank's subordinated debt is issued to DGBV, a fellow subsidiary of Dell Inc.

The following table details the main terms and conditions of the Group's capital instruments. A full description of the main features of the capital instruments is located in Appendix 2

| <i>In thousands of Euro</i>           | Reference rate  | Funding Date | Maturity | 31-Dec-17     | 31-Dec-16     |
|---------------------------------------|-----------------|--------------|----------|---------------|---------------|
|                                       | %               |              |          |               |               |
| Subordinated Loan                     | 3mth Euro Libor | Jun 2013     | Jun 2023 | 65,000        | 65,000        |
| Accrued interest payable              |                 |              |          | 65            | 68            |
| <b>Total Subordinated Liabilities</b> |                 |              |          | <b>65,065</b> | <b>65,068</b> |

## 2.3 Minimum Capital Requirements

The Bank uses the Standardised Approach for the calculation of its Pillar I capital requirements for credit risk. The capital requirements for market risk are calculated in accordance with the Standardised Measurement Method. Operational Risk capital is determined using the Basic Indicator Approach. The following table sets out the minimum capital required of the Bank under CRD IV.

### Own Funds Requirement - Risk Capital Held as at 31 December 2017

| <i>In thousands of Euro</i>                | Pillar I 2017  | Pillar I 2016 |
|--|----------------|---------------|
| <b>Credit Risk Exposure Classes</b>        |                |               |
| Central Governments and Central Banks      | 7              | 5             |
| Regional Governments                       | 4              | 87            |
| Institutions                               | 7,188          | 1,731         |
| Corporates                                 | 81,840         | 55,323        |
| Default                                    | 3,180          | 3,649         |
| Other Items                                | 14,326         | 11,046        |
| <b>Market Risk</b>                         |                |               |
| Foreign Exchange Risk                      | 316            | 159           |
| <b>Operational Risk</b>                    |                |               |
|  | 10,371         | 8,965         |
| <b>Credit Valuation Adjustment</b>         |                |               |
|  | 517            | 294           |
| <b>Total Pillar I Capital Requirements</b> | <b>117,749</b> | <b>81,259</b> |



The Bank assesses its capital adequacy on a Pillar I basis through the COREP<sup>4</sup> process. The Bank also has in place an Internal Capital Adequacy Assessment Process (ICAAP) to assess the adequacy of the Bank's capital in light of supporting current and future activities. The Bank's Asset and Liability Committee ("ALCO") is the primary management committee responsible for the ICAAP which is reviewed by the Risk Committee and approved by the Board. The Risk Committee and the Board review and assess the capital needs of the Bank on a regular basis. A key objective of the Bank's Risk Appetite Framework is to meet its minimum regulatory requirements at all times.

### Capital Buffers

As per Article 440 of the CRR, the Bank began reporting on additional CRD IV capital buffers<sup>5</sup> from January 2016. The capital conservation buffer is set at 2.5% of CET 1 capital and is a requirement for all banks. This requirement is under transition and being phased in from 1 January 2016 to 1 January 2019. The requirement as at 31 December 2017 is 1.25% (as at 31 December 2016 it was 0.625%).

The CRD IV countercyclical capital buffer is calculated as the weighted average of the buffers in effect in the jurisdictions to which banks have a credit exposure. It is calculated based on risk weighted assets excluding those for Covered Bonds, Central Governments or Central Banks, Regional Governments and Institutions and is implemented as an extension of the capital conservation buffer.

Systemic buffer requirements under CRD IV currently do not apply to the Bank due to its relative small size, non-complexity, and low risk profile.

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<sup>4</sup> Common Reporting (COREP) is a standardised reporting framework issued by the European Banking Authority for Capital Requirements Regulation reporting.

<sup>5</sup> Article 128 of CRDIV

## Countercyclical Capital Buffers

### Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

|     |                      | 2017                    |                                    |                               |                                     |
|-----|----------------------|-------------------------|------------------------------------|-------------------------------|-------------------------------------|
|     |                      | General Credit Exposure | Own Fund Requirements              | Own funds requirement weights | Countercyclical capital buffer rate |
|     |                      | Exposure Value for SA   | of which: General credit exposures |                               |                                     |
|     |                      | 010                     | 070                                | 110                           | 120                                 |
| 010 | Breakdown by country |                         |                                    |                               |                                     |
|     | Czech Republic       | 2,230,405               | 0                                  | 0.00%                         | 0.50%                               |
|     | Norway               | 9,808,919               | 633,627                            | 0.64%                         | 2.00%                               |
|     | Sweden               | 79,238,247              | 5,205,058                          | 5.24%                         | 2.00%                               |
|     | Iceland              | 1,222,568               | 91,401                             | 0.09%                         | 1.25%                               |
|     | Other                | 1,517,404,624           | 93,416,281                         | 94.03%                        | 0.00%                               |
| 020 | <b>Total</b>         | 1,609,904,763           | 99,346,367                         | 100.00%                       |                                     |

|  |  | 2016                    |                                    |                               |                                     |
|--|--|-------------------------|------------------------------------|-------------------------------|-------------------------------------|
|  |  | General Credit Exposure | Own Fund Requirements              | Own funds requirement weights | Countercyclical capital buffer rate |
|  |  | Exposure Value for SA   | of which: General credit exposures |                               |                                     |
|  |  | 010                     | 070                                | 110                           | 120                                 |
|  |  |                         |                                    |                               |                                     |
|  |  |                         |                                    |                               |                                     |
|  |  | 8,650,350               | 599,345                            | 0.86%                         | 1.50%                               |
|  |  | 77,165,825              | 5,572,731                          | 7.96%                         | 1.50%                               |
|  |  |                         |                                    |                               |                                     |
|  |  | 1,026,137,353           | 63,817,407                         | 91.18%                        | 0.00%                               |
|  |  | 1,111,953,529           | 69,989,483                         | 100.00%                       |                                     |

### Amount of institution-specific countercyclical capital buffer

|     |   | 2017          |
|-----|---|---------------|
| Row |   | Column        |
|     |   | 010           |
| 010 | Total Risk Exposure Amount                                      | 1,471,868,329 |
| 020 | Institution specific countercyclical capital buffer rate        | 0.1187%       |
| 030 | Institution specific countercyclical capital buffer requirement | 1,746,990     |

|  |  | 2016          |
|--|--|---------------|
|  |  | 010           |
|  |  | 1,015,732,485 |
|  |  | 0.1323%       |
|  |  | 1,343,597     |

## 2.4 Capital Management

The Bank's key objectives with regard to managing capital are:

- to comply with the capital requirements set by the Central Bank of Ireland;
- to safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns to shareholders and benefits for other stakeholders;
- to maintain a strong capital base to support the development of its business.

Capital adequacy and the use of regulatory capital are monitored weekly by the Bank's Regulatory function. The Bank holds own funds in the form of capital which will always be more than or equal to the higher of capital requirements calculated under Pillar I or Pillar II (ICAAP).

## 2.5 Capital Planning

A number of different modelling tools are used in the financial and capital planning process. Modifications may be made to models based upon the requirements of the relevant planning or forecast cycle including new regulatory requirements. Refinements in forecasting methodologies as well as changing business dynamics may also result in adjustments to existing and/or creation of new planning models. Once all the inputs have been finalised a financial plan is reviewed and approved by senior management, ALCO and the Board. Updated forecasts are produced during the year taking account of latest developments and up to date outlook.

The capital plan is based on the Bank's approved financial plan which is sufficiently detailed in terms of asset class, industry sectors, currency breakdowns, and impairments and provisioning to enable a comprehensive view of the capital requirements projections. All key components of the Bank's Pillar I capital adequacy ratio are included in the plan. The Bank's Pillar I capital adequacy position is monitored on a continuous basis and reported to management weekly.

The ICAAP is aligned with the financial planning process. ALCO reviews the Internal Capital Adequacy Assessment Report (ICAAP Report) and recommends it to the Risk Committee who in turn review and recommend it to the Board. The Board review and approve the ICAAP Report.

## 3. Risk management

### 3.1 Introduction

The Bank's operations involve the evaluation, acceptance and management of risk in accordance with its risk appetite. The Bank has in place an appropriate Risk Management Framework to identify, assess, manage, monitor, mitigate and report on the risks it faces. The Risk Management Framework establishes the high level principles, culture, appetite and approach to risk management in the Bank including roles & responsibilities, governance arrangements, and reporting requirements. The Risk Management Framework is reviewed and approved by the Board on an annual basis or as required.

Senior management are responsible for the management of risk on a day-to-day basis, under the oversight of the Board. The Bank has implemented a risk culture which promotes transparency and has established a risk governance structure that is supported by an appropriate Risk Management Framework, Risk Appetite Framework, and other policies, which reflect the size, complexity, and risk profile of the Bank.

### 3.2 Risk Framework

The Board and senior management have designed the Bank's Risk Management Framework and the Internal Control Framework to ensure the Bank manages risks appropriately in pursuit of its strategic objectives. All key Bank policies have appropriate regard to risk as an essential part of successfully operating the Bank. Senior Management continually reviews the operations of the Bank and assess the level of risk in line with the Bank's Risk Appetite, its policies and procedures, changes in its products and services, and changes in the market place in which it operates.

The Bank has in place a Risk Appetite Framework which sets out the Bank's approach to all material risks expressed in both qualitative and quantitative terms. Material risks are deemed to be those risks which may impact the Bank's ability to deliver on its business plan, service its customers, operate in a legal and compliant manner, impact the Bank's brand and reputation or cause financial loss exceeding Risk Appetite tolerances. Non-material risks are deemed to be those risks which do not impact the Bank's ability to deliver on its business plan, service its customers, operate in a legal and compliant manner, impact the Bank's reputation and brand.

The Board, as supported by Senior Management, is responsible for setting the Bank's Risk Appetite and risk tolerance at a level which is commensurate with its business plan, the expectations and requirements of its parent and the Central Bank of Ireland. The key material risks that have been identified are as follows:

- Credit Risk (including Credit Concentration Risk)
- Counterparty Credit Risk
- Market Risk
- Interest Rate Risk in the Banking Book
- Funding & Liquidity Risk
- Operational Risk
- Residual Asset Value Risk
- Capital Adequacy Risk
- Regulatory Compliance Risk
- Reputational Risk
- Business & Strategy Risk
- Group Risk

For each material risk the Bank has defined risk tolerance levels, monitoring and reporting metrics and a comprehensive framework for managing each risk which includes policies, internal controls and management information. The Bank also monitors other risks which have been determined to be non-material.

### **Three lines of defence model**

The Bank utilises a ‘three lines of defence’ approach to ensure that appropriate responsibility is allocated for monitoring, management, reporting and escalation where appropriate.

A key aspect of implementing a strong Internal Control Framework is the allocation of primary responsibility for identifying and managing risks to first line of defence i.e. the functional business areas and management who are responsible for day-to-day management of the Bank’s material risks. The Board and Senior Management of the Bank recognise the responsibility of the first line of defence in identifying and managing the risks inherent in the Bank’s products, services, activities, processes and systems for which it is accountable. In accordance with the Bank’s Risk and Control Self-Assessment framework, functional business areas have primary responsibility for assessing and testing the operational effectiveness of the Bank’s controls applicable to the risks inherent in their processes.

The second line of defence comprises the Risk Management Function and the Compliance Function. The second line of defence provides independent oversight of the appropriateness and effectiveness of the risk management systems, processes and controls in the first line of defence; prudent conduct of business; reliability of financial and non-financial information reported or disclosed (both internally and externally); and compliance with laws, regulations, supervisory requirements and the Bank’s internal policies and procedures. It is also responsible for formulating these policies and procedures and communicating them to the first line of defence. The Bank’s second line of defence covers the whole organisation and the activities of all business areas, support and control units, including any outsourced activities. The Risk Management Framework and Compliance Framework underpin the second line of defence oversight processes.

The third line of defence is Internal Audit Function, which provides independent assurance to management, the Audit Committee, the Board and external stakeholders (including the Central Bank of Ireland). It ensures that controls are in place for identified risks, that the controls are appropriately designed and operating effectively, and that the risks are being managed in accordance with applicable laws and regulations, including compliance with internal policies and procedures. The third line of defence reviews the effectiveness of the first and second lines of defence and makes recommendations for improvement as required.

### 3.3 Risk Governance

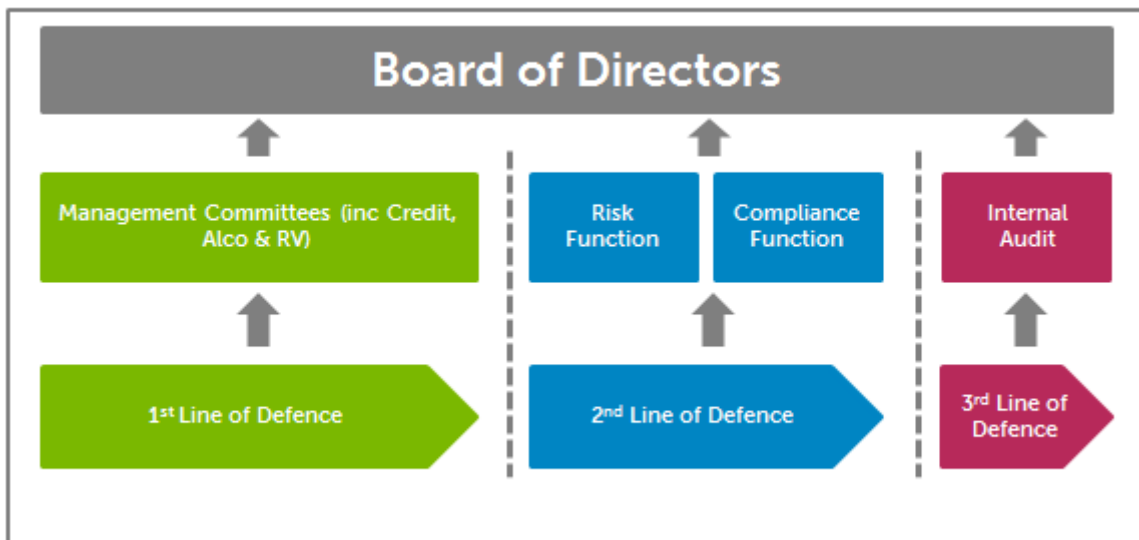
The Bank's organisational structure is designed to promote prudent and effective risk management of the Bank's activities. The mechanisms through which this is achieved include:

- a documented Board Charter which sets out the matters reserved for the Board and through a Delegated Authority Matrix, matters it has delegated to Board Sub Committees and to Management
- terms of references for all Board Committees\* which set out the decision making authorities and responsibilities of each committee
- Management Committee Terms of References which set out the responsibilities and reporting lines for each of the Management Committees

**Diagram: Oversight and Information flow – Management Committees**



The chart below displays the Bank's three lines of defence model.



\* The Board Sub Committees are: Audit Committee, Risk Committee and Remunerations and Nominations Committee as shown in the graph above

## Board Committees

The Audit Committee has been delegated responsibility by the Board to provide oversight in respect of the financial reporting process; the quality and integrity of the Bank's financial statements and Pillar III disclosures; internal control framework of the Bank; and oversight of the Bank's external auditors. The Internal Audit Function reports to the Audit Committee.

The Risk Committee of the Bank is responsible for oversight and advice to the Board on the significant risk exposures of the Bank and future risk strategy. The Risk Committee advises and makes recommendations to the Board on risk matters, including risk appetite, financial performance, capital adequacy, liquidity adequacy, recovery plans and policy. The Risk Committee also oversees the Bank's Risk Management Function. The Bank's Risk Management Function supports the Risk Committee in carrying out its duties and responsibilities by providing appropriate reporting of the risks in the business. Responsibility for risk management policies and risk tolerances lies with the Board of Directors. The Board of Directors has delegated authority to the Risk Committee to take all actions necessary to perform its duties and responsibilities in overseeing risk.

The Remuneration and Nomination Committee is responsible for determining the remuneration policy and framework in compliance with Central Bank of Ireland and European Banking Authority requirements. This includes identifying categories of staff with material risk-taking responsibilities and ensuring that fully compliant variable remuneration structures are in place. The Remuneration and Nomination Committee has oversight for recruitment of suitable candidates to fill the board and senior management vacancies. The Remuneration and Nomination Committee is also responsible for reviewing and approving performance-based remuneration in accordance with regulatory requirements.

## Management Committees

The Management Committee is responsible for the overall management of the Bank in accordance with the Board Charter and its Terms of Reference. The Management Committee is charged with identifying and managing the core operations of the Bank.

The Asset and Liability Committee (ALCO) is responsible for the management of the balance sheet of the Bank, including capital adequacy in accordance with the risk appetite approved by the Board, the Bank's Internal Capital Adequacy Assessment Process ("ICAAP") and the Bank's Internal Liquidity Adequacy Assessment Process ("ILAAP"). ALCO is also responsible for leading the development of the Bank's Recovery Plan. ALCO oversees the establishment and maintenance of appropriate procedures for the management of liquidity risk, market risk and contingency funding that are consistent with the strategy and policy approved by the Board.

The Credit Committee has been delegated responsibility by the Board to implement the credit policies and ensure procedures are in place, to oversee the Credit Function and associated credit risk management. The responsibilities of the Credit Committee include approval of credit proposals within its delegated authority, credit portfolio performance monitoring, and considering reviews of the internal credit controls. The Credit Committee is responsible for the overall management of credit exposures of the Bank. Credit exposures include both transactional and commercial credit. The responsibilities of the Credit Committee include establishing and developing the Credit Policy and recommending it to the Risk Committee for approval; implementing the credit authorities' matrix, manual grading/rating methodologies and automated scoring thresholds approved by the Risk Committee.

The Residual Asset Risk Committee of the Bank is responsible for the setting, validating and monitoring of residual asset risk in the Bank. The responsibilities include monitoring adherence to residual asset risk appetite and reviewing strategies and policies regarding setting of Residual Values.

In addition, the Management Committee is supported by a number of Councils and Committees such as the Risk Management Council, Compliance Council and Outsourcing Committee etc.

The Risk Management Council supports the Management Committee in understanding the risks faced by the business and taking appropriate decisions to mitigate the risks. The Compliance Council ensures compliance with laws and regulations and considers the impact of future legal and regulatory changes. The Outsourcing Committee oversees the management of the risks arising from the outsourcing of certain activities.

As required for specific projects, such as IFRS 9, specific steering committees are put in place to monitor the implementation of significant changes arising from new accounting policies, regulatory changes or business initiatives. These committees report to the Management Committee and to the Board or a Board Sub Committee as appropriate.

### 3.4 Board of Directors

#### **Appointments to the Board**

In assessing a candidate for a Board position with Dell Bank International d.a.c., the Board will bear in mind the predefined criteria which illustrate the skills and attributes desired of candidates for the Board per the various regulatory requirements. This information will also be considered in light of the criteria to assess the knowledge, skills and experience of potential candidates as part of the process for considering whether the candidate is suitable for the role in question in a pan- European, regulated credit institution.

#### **Composition of the Board**

At close of business on 31 December 2017, the Board was comprised of eight Directors.

#### **Cormac Costelloe**

Cormac Costelloe serves as Managing Director of the Company. In this role, he is responsible for providing Dell Technologies' customers with financing products that represent an integral part of Dell Technologies customer focused end to end technology offerings.

Before joining Dell, Cormac was Managing Director of CIT Vendor Finance Europe. Over his 20 year career, Cormac's experience is based around leadership roles in credit and business development at a number of leading financial institutions such as ABN-AMRO, ING Barings, Danske Bank and Hewlett-Packard's captive finance bank. Cormac holds a Master's Degree (Hon) In Banking and Finance from the Smurfit Business School and a Bachelor of Commerce from UCD.

Cormac holds two other directorship positions within the Dell Technologies Group.

#### **Hugh O'Donnell**

Hugh O'Donnell serves as Chief Financial Officer ("CFO") of the Company. Hugh joined the Company in July 2017 and was appointed to the Board on 13 September 2017. In his current capacity, he has responsibility for all financial functions of the Bank including accounting, financial planning, pricing, treasury, tax, and regulatory reporting.

Before joining Dell, Hugh held the position of Executive Director and CFO for Allied Irish Bank plc's (AIB) UK Division, a UK regulated retail and business Bank. Over his 20 year career, Hugh's experience centred on finance leadership roles in the Capital Markets, UK and Group Divisions of AIB and prior to that in corporate finance and auditing with Price Waterhouse Coopers. Hugh is a Chartered Accountant and a member of the Institute of Chartered Accountants in Ireland and also holds a Master's Degree in Accounting from the Smurfit Business School and a Bachelor of Commerce degree from UCD.

Hugh holds one other directorship position.



### **William Wavro**

William Wavro joined Dell in 2005 and is currently the President of Dell Financial Services (“DFS”). Prior to DFS, William served as CFO for the Global Commercial Business and also led the finance teams for the CSMB and SMB business units. He also spent 3 years based in Singapore and was CFO for Dell’s APJ business. He joined Dell as Vice President of Product Group Finance where he provided financial support to Dell’s R&D, product marketing, and operations organizations.

After graduating from The University of Texas with a degree in Accounting, William started his career with Price Waterhouse Coopers in September of 1985. He planned and executed worldwide external and internal audit plans for Fortune 500 clients in a variety of industries with a particular emphasis in Technology. Bill also spent 4 years in Europe with PwC servicing the needs of international clients on US GAAP accounting, statutory reporting, and international tax planning along with audit and consulting services. William joined Compaq in 1997 as a controller to help start up and lead Compaq Financial services to what would eventually become a \$2B Financial Services organization. Through a progression of finance roles within Compaq and then HP, he took over the role as CFO of the Personal Systems division of HP in 2003 before joining Dell in 2005. Bill is a Certified Public Accountant in the State of Texas.

William holds five other directorship positions within the Dell Technologies Group.

### **Tyler Johnson**

Tyler Johnson is currently Senior Vice President and Treasurer of Dell Technologies where his global responsibilities include debt financing and interest rate risk management, capital markets, insurance, liquidity management, cash and investment management, and customer and supplier financing solutions. Tyler worked at Dell from 1995 to 2008 and again rejoined in 2013 where he assumed his current role. Prior to Dell, Tyler served as Vice President and Treasurer for Cooper Industries, a global manufacturer of electrical products headquartered in Dublin. Tyler’s previous roles have included Treasury, Financial Reporting and Analysis, and Internal Audit. After graduating from The University of Texas with a degree in Economics, Tyler started his career with Bank of America as a currency options trader, firstly in Los Angeles and later relocating to New York City with short term assignments in Hong Kong and Japan. Tyler is a CFA Charterholder since 2006.

Tyler holds nine other directorships positions within the Dell Technologies Group.

### **Frank O’Riordan**

Frank serves as Senior Independent Director of the Company. Frank qualified as a solicitor in 1976 having previously obtained a BCL and a LLM from UCD. In 1977, he joined A&L Goodbody Solicitors and practiced in Company Law. In 1981, Frank was appointed an equity Partner and ran the New York office for two years. His remit was to develop business in the areas of inward investment in Ireland and M&A activity involving Ireland.

In 1983, he returned to A&L in Dublin as Practice Development Partner. In 1993, he was appointed Managing Partner, A&L Goodbody Solicitors, responsible for managing a practice of approximately 500 staff and maintaining client responsibilities. In 2001, Frank stepped down as Managing Partner. He worked as a consultant for a number of years which included the set-up of Goodbody Consultancy to deal with non-legal consultancy clients from 2001 to 2004. Frank has 39 years of experience in the legal, banking and financial services sectors in Ireland. Since stepping down from A&L Goodbody in 2001, Frank has joined a number of Boards as a Non-Executive Director particularly in financial services.

Frank currently holds an additional four directorships.

### **Donal Courtney**

Donal qualified with an Honours Bachelor of Business Studies degree from Trinity College in 1985 and started his career as a trainee Chartered Accountant with Arthur Andersen qualifying with the Institute of Chartered Accountants in Ireland in 1989. In 1990 he was promoted to General Practice Manager in Arthur Andersen. During his time in Arthur Andersen Donal worked primarily with Financial Services clients including banking, leasing and asset financing clients. In 1992, Donal joined Orix Corporation's Irish operations as Financial Director. Orix were principally involved in financial services and aircraft leasing operations. In 1996, he joined Airbus Industries' Irish operations as Chief Financial officer. Airbus had set up an Irish operation to raise finance for aircraft development and also to acquire and lease second hand aircraft. In 2001, he joined GMAC Commercial Mortgage Bank Europe ("GMAC CM") as Senior Vice President & Chief Financial Officer for Europe. GMAC CM at this time set up a Bank in Ireland and were involved in financing real estate across Europe by way of loan and securitisation products.

Donal has 30 years' experience in financial services, commercial banking, asset financing and aircraft leasing industries in Ireland and Europe. Since 2009, he has served as a Non-Executive Director of UniCredit Bank Ireland where he is Chairman of the Audit committee. In April 2016 he was appointed as a Director of IPUT PLC, the Irish regulated Commercial property investment company where he also chairs the audit and risk committee. In 2009 he was awarded a Certificate in Directors Duties and Responsibilities from the Institute of Chartered Accountants in Ireland.

Donal holds an additional three directorships.

### **Don Berman**

Don holds a BBA and a MBA from the University of Texas at Austin. His career began with Associates First Capital in 1982 where he held various finance roles before becoming Senior Vice President of Consumer Planning & Analysis in 1990. In 1994, he was Senior Vice President of Credit Card Marketing. In 1996 he was promoted to Executive Vice President and Chief Credit Officer for the Credit Card Group. This was followed by General Manager roles in the Retail Private Label and US Bankcard Businesses. Associates First Capital was acquired by Citigroup in 2000. Don joined Discover Financial Services in 2003 as Senior Vice President and Chief Credit Officer where he led the development of credit strategies, decision models and infrastructure for one of the largest card issuers in the world. He was responsible for Risk Management and Decision Science for \$48 billion credit card portfolio in the U.S. and U.K. Throughout 2006 and 2007 Don provided various banks and finance companies with consultancy expertise on areas including strategic assessments, expert opinion and customer value management.

Don joined Dell Financial Services (DFS) in 2007 as President and General Manager and held responsibility for the operations and P&L of the \$5.5B captive finance subsidiary of Dell Inc. DFS provides full service lending and leasing capabilities for Dell's consumer, small and medium business, and commercial business segments. Don remained in this role until 2012 and retired from Dell in 2013.

Don does not hold any other directorship positions.

### **Roisin Brennan**

Roisin Brennan joined the Board in July 2016 as an Independent Director.

Roisin is a former Chief Executive of IBI Corporate Finance Limited where she worked for over 20 years advising primarily public companies on various matters including Mergers and Acquisitions, Public Takeovers and IPOs. Roisin is a non-executive director of Coillte Teo (the Irish State forestry company), Musgrave Group plc and a former Non-Executive Director of DCC plc and of Wireless Group plc. Roisin qualified as a Chartered Accountant with Arthur Andersen and graduated with First Class Honours in Law from University College Dublin.

Roisin holds an additional three directorships.

### 3.5 Diversity and Inclusion

Diversity and Inclusion is an important business imperative at the Bank. The Bank is committed to achieving a diverse Board of Directors in terms of the required skills, experience, residency requirements, independence, regulatory requirements and Dell Group experience. The Bank has a Board Diversity Policy, which in line with Article 435 CRR has been disclosed at the location; [Dell Bank Diversity Policy](#). The Bank aims to have a minimum of twenty five (25%) percent females on the Board of Directors. In 2016 Roisin Brennan was appointed to the Board. The Bank will continue to review the composition as opportunities arise to change composition of the Board. As per the CRR<sup>6</sup> the Bank must disclose the extent to which objectives and targets with regards to diversity are achieved. Progress on achieving the target set out in the Board Diversity Policy is monitored as changes in membership occur.

For the purposes of complying with Regulation 76(5) SI No. 158 of 2014 European Union (Capital Requirements) Regulations 2014, this information is made public on the website of the Bank and the “management body” is the Board of Directors of the Bank.

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<sup>6</sup> Article 435 (c) of the CRR

## 4. Key Risks

### 4.1 Credit Risk

#### Introduction

Credit risk represents a significant risk at the Bank. Credit risk refers to the risk that the Bank's customers fail to meet their scheduled payments for operating leases, finance lease and loans approved by the Bank's credit function in addition to credit risk arising from Treasury activities with other credit institutions such as placing of deposits with counterparties and from the purchase of interest rate and foreign exchange derivatives for economic hedging purposes. The core values and main procedures governing the provision of credit are laid down in credit policy documents; these have been approved by the Board of Directors and are reviewed regularly.

#### Credit Decision

The Bank measures credit risk on an individual counterparty basis, utilising either an automated or manual credit underwriting process. Automated credit decisions are based primarily on customer information obtained from third party credit reporting agencies (Credit Bureau and Fraud databases) and are subject to automated credit-granting rules that utilise mathematically derived and statistically based credit scorecards. An integral part of the credit-granting process is a comprehensive set of management tools and controls that dictate acceptable credit score cut-offs and risk grades.

The Bank requires all customers be graded under the internal grading system, including all new business, renewals of existing credit facilities and periodic reviews of liquidating exposures. Any change in a condition of a customer or a credit facility may have its risk grades reviewed and adjusted accordingly. The Bank uses a 16 point scale in assigning Probability of Default (PD) grades of customers. The grades provide an estimate of a customer's PD within a 12 month horizon. Quantitative and qualitative measures are used to develop a PD grade. The probability of default will increase proportionally as the grade increases. The Bank uses a Loss Given Default ("LGD") scale which expresses the loss on a facility as a proportion of exposure. Quantitative and qualitative measures are used to inform the LGD grade. The percentage of exposure lost given a default scenario increases as the LGD grade increases. Management of credit risk is in accordance with the Capital Requirements Regulation & Capital Requirements Directive collectively known as CRD IV. The Bank applies the standardized approach for calculating credit risk weighted assets and this is embedded in the Bank's daily operational management.

#### Credit Risk Mitigation

The Bank structures the levels of credit risk it undertakes by placing limits on the amount of risk accepted in relation to one borrower, or groups of borrowers, and to geographical and industry segments. Such risks are monitored on an ongoing basis and subject to an annual or more frequent review, when considered necessary.

Some other specific control and mitigation measures that may be undertaken by the Bank to mitigate credit risk include the taking of corporate guarantees, and, on occasion, personal guarantees, Letters of Credit, Insurance & Self-insurance. In respect of all lease contracts, the Bank retains the title of underlying assets as collateral. In the event of a default the Bank reserves the right to recover the leased assets. From time to time, the Bank may accept other forms of credit risk mitigants.

Credit Concentrations are managed as per regulatory large exposure requirements and the Bank's Risk Appetite Statement with risk assessments completed via the Bank's ICAAP.

#### Regulatory Credit Risk Exposures

Management of credit risk is in accordance with the Capital Requirements Regulation & Capital Requirements Directive collectively known as CRD IV. The Bank applies the standardised approach for calculating credit risk weighted assets and this is embedded in the Bank's daily operational management.

An analysis of the Bank's Credit Risk by Exposure Class is set out in the table below. Further analysis by geography, industry, maturity and risk weight can be found in Appendix 4 - Credit Risk Analysis.

An analysis of the Bank's Credit Risk Assets is set out in the tables below:

### Credit Risk Assets by Asset Class

| <i>In thousands of Euro</i>  | Pillar I<br>EAD 2017 | Average EAD<br>during 2017 | Pillar I<br>EAD 2016 | Average EAD<br>during 2016 |
|--|----------------------|----------------------------|----------------------|----------------------------|
| Central Governments and Central Banks  | 175,736              | 168,237                    | 141,216              | 126,336                    |
| Regional Governments   | 275                  | 429                        | 5,319                | 1,783                      |
| Institutions   | 184,629              | 120,648                    | 74,449               | 73,105                     |
| Corporates   | 1,047,210            | 905,357                    | 722,394              | 636,205                    |
| Default  | 26,512               | 39,950                     | 30,496               | 20,505                     |
| Other Items  | 175,543              | 160,120                    | 138,079              | 134,993                    |
| <b>Total</b>   | <b>1,609,905</b>     | <b>1,394,741</b>           | <b>1,111,954</b>     | <b>992,926</b>             |
| <i>Of which Counterparty Credit Risk (MTM approach as per CRR Article 274)</i> | 19,209               |                            | 16,431               |                            |

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<sup>7</sup> Exposure at Default ("EAD") is defined as Exposure Value less provisions and Credit Risk Mitigation Adjustments

## Use of External Credit Assessment Institutions (“ECAI’s”)

For Credit monitoring and decision making the Bank uses an internal ratings scale based on probabilities of default and ultimate loss to derive its own rating. These ratings may be supplemented by ratings from Moody’s Investor Service and /or Standard and Poor’s Ratings Agency ratings assessments. Where these ratings are not available the Bank uses an internal ratings scale based on probabilities of default and ultimate loss to derive its own rating.

In respect to COREP capital calculation purposes, where a counterparty is classed as a credit institution and it is rated by an ECAI, the Bank obtains the rating to calculate the required Risk Weighting. The Bank uses the Moody’s Investor Service and Standard and Poor’s Rating Group as its nominated ECAIs for its rated exposures. In line with the provisions of Article 120 and 136 of the CRR, the ratings are mapped to a Pillar 1 credit quality step, which in turn is mapped to a risk weight. As per Article 121 (3), where the Bank has exposures to unrated institutions with an original effective maturity of three months or less, the risk weight shall be 20%.

As at 31 December 2017 the exposure classes for which ECAIs are used by the Bank in calculating its Pillar 1 minimum capital requirements are as follows:

- Credit and Counterparty Risks and free deliverables – Institutions

The following tables detail the ECAI’s association with the Credit Quality Steps and the related Exposure at Default

### ECAI’s 2017

#### Short Term Exposures (Under 3 months’ residual maturity)

*In thousands of Euro*

| Credit Rating                                 | A      | A+  | A-     | BBB+ | BBB   | BBB-  |
|---|--------|-----|--------|------|-------|-------|
| Credit Quality Steps for Short Term Exposures | 2      | 2   | 2      | 3    | 3     | 3     |
| Exposure At Default                           | 12,842 | 591 | 90,946 | 762  | 2,132 | 1,385 |

#### Long Term Exposures (over 3 months’ residual maturity)

*In thousands of Euro*

| Credit Rating                                | A     | A+    | A-  | BBB   | BBB+  |
|--|-------|-------|-----|-------|-------|
| Credit Quality Steps for Long Term Exposures | 2     | 2     | 2   | 3     | 3     |
| Exposure At Default                          | 7,141 | 2,879 | 268 | 4,024 | 2,639 |

## ECAI's 2016

### Short Term Exposures (Under 3 months' residual maturity)

| Credit Rating                                 | A     | BBB+   | BBB | BB+ |
|---|-------|--------|-----|-----|
| Credit Quality Steps for Short Term Exposures | 2     | 3      | 3   | 4   |
| Exposure At Default                           | 1,752 | 54,654 | 870 | 650 |

### Long Term Exposures (over 3 months' residual maturity)

*In thousands of Euro*

| Credit Rating                                | A     | BBB   | BBB+  |
|--|-------|-------|-------|
| Credit Quality Steps for Long Term Exposures | 2     | 3     | 3     |
| Exposure At Default                          | 8,749 | 3,275 | 1,291 |

### Impairment

The Bank first determines whether evidence of impairment exists individually for financial assets that are individually significant. If the Bank determines that there is impairment of a particular financial asset then a specific provision is booked against the asset. If the Bank concludes that no specific indication of impairment exists for an individually assessed financial asset it includes the asset in a group of financial assets with related credit risk characteristics and includes these assets under the collective incurred but not reported ("IBNR") assessment. A loan is considered impaired when there is objective evidence of impairment and a specific provision has been recognised in the income statement. Past due is defined as loan/lease contracts where repayment of principal or interest are overdue by at least one day. For 2017 the Bank reports on impairments under IAS 39.

The Bank established an IFRS 9 programme to manage the implementation of this new accounting standard. This programme was completed on time and the Bank began applying these standards from 1 January 2018.

The most significant change arising from the IFRS 9 standard for the Bank relates to loan provisioning requirements. The Bank has developed a new expected credit loss model that replaces the incurred loss impairment model used under IAS 39.

IFRS 9 also sets out requirements for recognising and measuring financial assets, financial liabilities and some contracts to buy or sell non-financial items. The Group has implemented a two-step approach as per the IFRS 9 standard in determining the classification of financial assets; that is (i) business model assessment and (ii) contractual cash flow characteristics testing.

An analysis of impairments can be found in Appendix 5 - Credit Quality.

**Template 16: EU CR2-A – Changes in the stock of general and specific credit risk adjustments**

|    |  | 2017  |  | 2016  |  |
|----|--|---|--|---|--|
|    |  | a   | b  | a   | b  |
|    |  | Accumulated specific credit risk adjustment | Accumulated general credit risk adjustment | Accumulated specific credit risk adjustment | Accumulated general credit risk adjustment |
| 1  | <b>Opening balance</b>   | 5,764,660                                   |  | 4,100,952                                   |  |
| 2  | Increases due to amounts set aside for estimated loan losses during the period             | 7,872,465                                   |  | 3,276,933                                   |  |
| 3  | Decreases due to amounts reversed for estimated loan losses during the period              | (132,570)                                   |  | (1,548,826)                                 |  |
| 4  | Decreases due to amounts taken against accumulated credit risk adjustments                 | (6,132,095)                                 |  | (86,664)                                    |  |
| 5  | Transfers between credit risk adjustments  |   |  |   |  |
| 6  | Impact of exchange rate differences  |   |  |   |  |
| 7  | Business combinations, including acquisitions and disposals of subsidiaries                |   |  |   |  |
| 8  | Other adjustments  | (155,112)                                   |  | 22,265                                      |  |
| 9  | <b>Closing balance</b>   | 7,217,348                                   |  | 5,764,660                                   |  |
| 10 | Recoveries on credit risk adjustments recorded directly to the statement of profit or loss | 474,214                                     |  | 1,028,815                                   |  |
| 11 | Specific credit risk adjustments directly recorded to the statement of profit or loss      |   |  |   |  |

The movement in the Gross Carrying Value of impairments for 2017 are shown in the table below:

**Template 17: EU CR2-B - Changes in the stock of defaulted and impaired loans and debt securities**

|   |   | 2017                                     | 2016                                     |
|---|---|--|--|
|   |   | a  |  |
|   |   | Gross carrying value defaulted exposures | Gross carrying value defaulted exposures |
| 1 | <b>Opening balance</b>  | 34,513,007                               | 15,880,326                               |
| 2 | Loans and debt securities that have defaulted or impaired since the last reporting period | 25,471,146                               | 34,226,771                               |
| 3 | Returned to non-defaulted status  | (30,393,657)                             | (15,408,395)                             |
| 4 | Amounts written off   | (1,866,793)                              | (185,695)                                |
| 5 | Other changes   |  |  |
| 6 | <b>Closing balance</b>  | 27,723,703                               | 34,513,007                               |



## 4.2 Counterparty credit risks

Counterparty credit risk is the risk that counterparties to derivative contracts will fail to meet their contractual obligations causing replacement losses to the other party. Counterparty credit risk arises from Treasury activities with other credit institutions including the purchase of interest rate and foreign exchange derivatives for economic hedging purposes. The Bank uses the Mark-to-Market Method for measuring counterparty credit risk as outlined in Article 274 of the CRR. Under this method the positive replacement cost of a contract is added to the potential future credit exposure of a contract. The potential future credit exposure of a contract is determined by multiplying the notional value by an add-on factor. The add-on factor is determined by reference to the contract type and residual maturity.

The Bank mitigates counterparty credit risk by implementing netting techniques and exchanging collateral. Netting as outlined in Article 298 of the CRR, is employed where there are contractual netting agreements in place with counterparties. Netting can reduce the potential future credit exposure. The culmination of the positive replacement cost, potential future credit exposure less netting benefits provides the Exposure at default (EAD). The Bank has the ability to call on collateral for in scope derivatives, as defined under the European Market Infrastructure Regulation, in the event of counterparty default.

Limits are set for specific tenors on the basis of product type. For the avoidance of doubt, the Bank cannot transact with a Treasury counterparty in the absence of an approved credit limit. The Treasury counterparty exposure is monitored on a daily basis. On a monthly basis, the Credit function reports the level of exposure for each Treasury counterparty to the Credit Committee. Based on recommendations from the Credit function, the Credit Committee may change the internal rating of a Treasury counterparty if its financial health deteriorates or market conditions change rapidly enough to put the Bank at risk. It is the responsibility of the Bank's Credit function to establish and maintain the Treasury counterparty Credit Limits in the Bank's systems following the credit approval process. The Credit function reports any material breach of a Treasury counterparty Credit Limit to the Credit Committee.

The volatility of the credit spread of counterparties is captured through the application of CRD IV Standardised Credit Value Adjustment (CVA) Capital Charge.

**Template 26: EU CCR2 - CVA Capital Charge**

|     |   | 2017           |           | 2016           |           |
|-----|---|----------------|-----------|----------------|-----------|
|     |   | a              | b         | a              | b         |
|     |   | Exposure value | RWAs      | Exposure value | RWAs      |
| 1   | Total portfolios subject to the advanced method   |                |           |                |           |
| 2   | (i) VaR component (including the 3x multiplier)   |                |           |                |           |
| 3   | (ii) SVaR component (including the 3x multiplier) |                |           |                |           |
| 4   | All portfolios subject to the standardised method | 18,194,401     | 6,462,966 | 16,013,831     | 3,673,197 |
| EU4 | Based on the original exposure method             |                |           |                |           |
| 5   | Total subject to the CVA capital charge           | 18,194,401     | 6,462,966 | 16,013,831     | 3,673,197 |

### 4.3 Market risk - foreign exchange risk

Foreign exchange risk is a financial risk caused by an exposure to unanticipated changes in the exchange rate between two currencies. The Bank is a Euro denominated entity but engages in leasing business throughout the European Economic Area (“EEA”) region and is exposed to currency risk across the following currencies: GBP, CHF, USD, DKK, SEK, NOK and PLN. The Bank has transaction exposure as it has contractual non-Euro cash flows (receivables and payables) whose values are subject to unanticipated changes in exchange rates. To realise the euro value of the Bank’s foreign denominated cash flows, the Bank employs an FX hedging program.

Resulting from the use of derivative instruments, the Bank is exposed to the risk that counterparties will fail to meet their contractual obligations. To mitigate against this risk the Bank maintains risk limits that correspond to each institution’s credit rating and for certain derivatives it is entitled to receive collateral in the form of euro cash.

The FX risk management model transforms the net un-hedged position by currency into an implied maximum loss amount. Credit Conversion Factors (“CCF”) are utilised to calculate the exposure by currency and maturity profile. The total implied FX loss by currency is then converted to a Euro equivalent base and aggregated. The resulting Euro implied FX loss aggregation is monitored against the Bank’s FX loss Target, Trigger and Limit on a daily basis and reported to ALCO monthly.

**Template 34: EU MR1 - Market Risk under the Standardised Approach**

|   |   | 2017             |                      | 2016             |                      |
|---|---|------------------|----------------------|------------------|----------------------|
|   |   | a                | b                    | a                | b                    |
|   |   | RWAs             | Capital requirements | RWAs             | Capital requirements |
|   | Outright products                         |                  |                      |                  |                      |
| 1 | Interest rate risk (general and specific) |                  |                      |                  |                      |
| 2 | Equity risk (general and specific)        |                  |                      |                  |                      |
| 3 | Foreign exchange risk                     | 3,946,238        | 315,699              | 1,986,394        |                      |
| 4 | Commodity risk                            |                  |                      |                  |                      |
|   | Options                                   |                  |                      |                  |                      |
| 5 | Simplified approach                       |                  |                      |                  |                      |
| 6 | Delta-plus method                         |                  |                      |                  |                      |
| 7 | Scenario approach                         |                  |                      |                  |                      |
| 8 | Securitisation (specific risk)            |                  |                      |                  |                      |
| 9 | <b>Total</b>                              | <b>3,946,238</b> | <b>315,699</b>       | <b>1,986,394</b> |                      |

#### 4.4 Interest rate risk in the banking book (IRRBB)

Interest rate risk is the risk that the Bank will experience deterioration in its financial position as interest rates change over time. The Bank only enters into interest rate related derivatives to manage the interest rate risk arising in its Banking Book. The Bank's portfolio of non-traded financial instruments principally comprises of commercial finance and operating leases, external loan facilities, capital and hedging instruments.

The main source of this interest rate risk is re-pricing risk, which reflects the fact that the Bank's assets and liabilities are comprised of different maturities and are priced off different interest rate indices. This is the risk that the interest earned on assets and paid on liabilities will change disproportionately if interest rates change owing to differences in the re-pricing characteristics of those assets and liabilities. The extent of the risk depends on the scale of the re-pricing maturity mismatches on the Bank's balance sheet.

Interest rate risk in the banking book is calculated on the basis of establishing the re-pricing risk ladder. The majority of asset and liability balances are profiled out by contractual maturity or re-pricing date. Non-financial asset and liabilities (mainly comprised of operating leases, the Bank's capital and reserves) are spread evenly across the risk ladder over medium and longer term maturities.

The Bank applies a range of stress scenarios to this profile to measure the overall level of interest rate risk and ensure there is no exposure to the yield curve. One scenario applied is the Committee of European Banking Authority ("EBA") Interest Rate Risk stress scenario based on a 200bps upward yield curve shock. The EBA guidelines provide the maturity bucket percentage weightings and the residual un-hedged risk position is then measured against prescribed risk limits.

IRRBB is monitored on a daily basis and the positions are reported regularly to ALCO. As the Bank is a Euro denominated entity providing funding for its non-Euro denominated business primarily in Euro and with the FX hedging program ensuring cash-flows convert to Euro base currency, risk positions are managed and monitored on a Euro basis.

The Bank also uses an undiscounted PV01 metric as a means of interest rate risk management. The PV01 measures the P&L impact of a one basis point shift in the yield curve on the Bank's risk exposure.

Both EBA and PV01 metrics are used to determine the level of hedging required. The Bank maintains a Euro based interest rate swap portfolio to mitigate its interest rate risk exposure.

##### **The Non Traded Interest Rate Risk position during the course of the reporting period was:**

|   | <b>2017</b>  | <b>2016</b>  |
|---|--------------|--------------|
|   | <b>€'000</b> | <b>€'000</b> |
| 200bps upward shock stress scenario as at 31 December   | 2,232        | 3,096        |
| Average 200bps upward shock stress scenario for the reporting period 1 January – 31 December    | 1,525        | 1,200        |
| Maximum 200bps upward shock stress scenario during the reporting period 1 January – 31 December | 3,272        | 3,096        |

IRRBB is monitored on a daily basis and the positions are reported at the monthly ALCO meeting. As the Bank is a Euro denominated entity providing funding for its non-Euro denominated business primarily in Euro and with the FX hedging program ensuring cash-flows convert to Euro base currency, risk positions are managed and monitored on a Euro basis. The Bank also uses undiscounted PV01<sup>8</sup>, Earnings at Risk (EAR), and Economic Value of Equity (EVE) metrics as a means of interest rate risk management.

The EAR captures the short-term effect of interest rate changes on the earnings of the Bank. The EAR is measured by applying a +200bps ramped shock to interest rate sensitive asset and liabilities which are based on dynamic balance sheet projections contained within the Bank's ICAAP over a one year period.

The EVE captures the longer-term effect of interest rate changes on the economic value of the Bank. The EVE is measured by applying a +200bps parallel shock to interest rate sensitive asset and liabilities which are based on dynamic balance sheet projections contained within the Bank's ICAAP over a one year period.

The PV01, EAR and EVE metrics are used to determine the level of hedging required. The Bank maintains a Euro based interest rate swap portfolio to mitigate its interest rate risk exposure.

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<sup>8</sup> PV01 is the change in present value of an asset or liability for a 1 basis point change in the nominal yield curve used to value the asset or liability

## 4.5 Funding & Liquidity risk

Effective liquidity risk management is central to the building of a strong and solid balance sheet and is a key pillar in the Bank's core strategy.

Liquidity risk is the risk that the Bank is unable to meet its on and off balance sheet obligations when they fall due without incurring significant costs. Liquidity risk is highly dependent on the Bank's balance sheet characteristics such as the maturity profile of the assets and liabilities, the quality of its liquidity buffer, broader market conditions and access to sufficient market funding.

Outflows include payments made to affiliates and Value Added Resellers, on the origination of lease contracts, cash requirements from contractual commitments, inter-bank deposits being withdrawn or other cash outflows, such as significant operating expenditure or debt maturities. Such outflows would deplete available cash resources.

The Bank's assets are comprised primarily of lease and loan obligations. These loans have short to medium term contractual repayment profiles (typically 3 year amortisation schedules) although the credit agreements allow the lessor in general to repay at will. In aggregate, such a pool of assets will have a reasonably predictable repayment profile, though one that is still variable and that may vary systematically based on a variety of market and macroeconomic factors.

The Bank has a robust and comprehensive policy for assessing, measuring and managing liquidity risk. The ALCO is responsible for defining and approving the Bank's liquidity policy in accordance with the broader Risk Policies established by the Risk Committee.

The Bank's Liquidity Policy reflects CRD IV requirements and the Central Bank of Ireland's requirements for the Management of Liquidity Risk. The liquidity risk framework is subject to internal oversight, challenge and governance. The ALCO has primary responsibility and reports to the Board Risk Committee. Liquidity risk is also monitored by the control functions as appropriate.

### a) Stress Testing

The strength of the Bank's liquidity risk management is evaluated based on its ability to survive under stress. Effective management of liquidity involves assessing this potential mismatch under a variety of stress scenarios. Stress testing is used to help inform a broader understanding of liquidity risk as well as to model specific liquidity risk events.

The Bank actively monitors a range of market and firm specific indicators on an on-going basis which are designed to act as early warning indicators that liquidity stresses are emerging. The stresses will apply a range of behavioural assumptions to the performance of the asset and liability products. Scenarios include assumptions about significant changes in key funding sources, credit ratings, contingent sources of funds and political and economic conditions. The Bank is expected to be able to withstand these stressed conditions through its own resources. Simulated liquidity stress testing is carried out regularly and reflects the impact of firm specific and market related scenarios on the adequacy of the Bank's liquid resources.

### b) Liquidity Monitoring

The Treasury function is responsible for the daily management of the liquidity buffer, monitoring and reporting of the Bank's liquidity position in accordance with the Liquidity Policy. The Liquidity Coverage Ratio ("LCR") as prescribed in the Basel III accord is internally modelled and monitored by the Bank and includes Target, Trigger and Limit parameters. The Bank complies with the Liquidity Coverage Ratio (LCR) as specified by the regulations<sup>9</sup>. As per the CRR and EBA regulatory guidelines, from October 2015 the Bank began reporting the LCR ratio calculation template on a monthly basis to the Central Bank of Ireland. As at December 2017 the

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<sup>9</sup> Commission delegated regulation to supplement Regulation (EU) 575/2013 with regard to liquidity coverage requirement for Credit Institutions

Bank's reported LCR was 316% (See Appendix 7). This is in excess of the regulatory requirement for 2017 of 80%. This requirement is being phased in to reach a maximum of 100% in 2018.

The Net Stable Funding Ratio is also monitored and modelled by the Treasury function.

The Treasury function reports the results of the Idiosyncratic Scenario to the ALCO members on a weekly basis. The liquidity position, compliance and policy are further monitored by the Risk Management function.

Any breach or material deterioration of these metrics would set in motion a series of actions and escalations.

The Bank sources funds from five principal sources:

- Contributed equity and retained earnings
- Affiliate borrowings
- External Loan facilities
- Interbank/Corporate Deposits
- Unsecured funding

The mix of sources is intended to provide the Bank with a diversified and stable funding base.

The Additional Liquidity Monitoring Metrics (ALMM) return came into force in March 2016. The ALMM return was introduced to provide regulatory supervisors (ECB) additional metrics/monitoring tools beyond the LCR and Net Stable Funding Ratio (NSFR) to help assess a bank's overall liquidity risk and facilitate the Internal Liquidity Adequacy Assessment Process (ILAAP) review process. Dell Bank reports the following ALMM metrics:

**Concentration of funding by counterparty or product type** which allows the identification of the Bank's sources of funding of such significance that their withdrawal could trigger liquidity problems.

**Prices of various lengths of funding** which measures the Bank's average transaction volume and prices paid for the Bank's new sources of funding in the previous 30 days.

**Rollover of funding** captures the Bank's volume of funds maturing, rolling over and any new funding obtained on a daily basis over a monthly time horizon.

**Concentration of counterbalancing capacity** by counterparty captures the Bank's concentration of counterbalancing capacity, undrawn committed funding lines granted to the Bank

The Bank use the ALMM monitoring tools to further strengthen the Bank's liquidity risk management with ongoing monitoring of the liquidity risk exposures of the Bank.

### c) Assets held for Managing Liquidity Risk

The Bank holds a portfolio of cash and money market placements to manage its liquidity profile. Liquid assets are assets which can be quickly and easily converted into cash without incurring significant loss. The Bank's assets held for managing liquidity risk comprise of:

- cash
- short term bank placements
- overnight placement with the CBI as an eligible High Quality Liquid Asset for the purpose of supporting management of the Bank's LCR regulatory requirement.

These assets in aggregate are permitted to comprise up to 100% of the Bank's liquid asset holdings.

### d) Derivatives

The Bank has entered into a number of Credit Support Annexes ("CSAs") during 2017 with its derivative counterparties in preparation for European Market Infrastructure Regulation ("EMIR").

A CSA forms part of the ISDA Master Agreement and defines the terms under which collateral is posted or transferred between swap counterparties to mitigate the credit risk arising from "in the money" derivative positions.

**e) Liquidity Risk – Off Balance sheet items**

The following items are listed as off balance sheet items at the financial year end:

- Residual value guarantees
- Lease and loan commitments to extend credit

**f) Internal Liquidity Adequacy Assessment Process (ILAAP)**

The ILAAP process forms one of the four core components of a significantly enhanced Supervisory Review & Evaluation Process (SREP) methodology. The Bank completed its first ILAAP submission to the Central Bank of Ireland (CBI) in March 2017 with the results demonstrating the Bank's Liquidity Adequacy.

The Bank's ILAAP is formulated as required to facilitate senior management and supervisors in determining overall liquidity risk/adequacy within the Bank.

The key components addressed are disclosed below:

- **Liquidity & Funding Strategy:** The Bank have in place a detailed Board approved Liquidity and Funding Plan which considers the impacts of short term (liquidity) and longer term (funding) risks.
- **Liquidity Adequacy:** In supporting the assessment of the Bank's Liquidity and Funding strategies the Bank separately identifies short term and longer term risk factors. These factors are subject to regular monitoring and internal stress testing with the objective of ensuring regulatory compliance is maintained at all times.
- **Liquidity Buffer & Contingency Funding Plan (CFP) Effectiveness:** The effectiveness of the Bank in addressing the impacts of stress events is determined by the strength of its Liquidity Buffer and actions contained within its CFP. The Liquidity Buffer effectiveness is reviewed over short term acute stresses with the CFP effectiveness reviewed over longer term stress events.

In line with the governance process applied under the Internal Capital Adequacy Assessment Process (ICAAP) assessment the Board and Senior Management are ultimately responsible for the Bank's Internal Liquidity Adequacy Assessment Process (ILAAP).

## 4.6 Operational risk

The Bank faces operational risks in the regular conduct of its day to day business. Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. Sources of operational risk include internal fraud; external fraud; employment practices and workplace safety; clients, products, and business practices; damage to physical assets; business disruption and system failures; and execution, delivery and system failures.

The Bank's Operational Risk management framework exists to mitigate against such risks. The Operational Risk management framework is structured in a three tier environment comprising; identification and assessment, monitoring and reporting; and control and mitigation.

Operational risk specifically arises in the areas of:

- Business continuity
- Change management
- People
- Internal controls
- Information technology
- New product development
- Outsourcing

The Bank uses a range of tools to identify, assess and manage operational risk such as: business process mapping, risk and control assessments and testing, key risk indicator and key performance indicator reporting and assessments, and internal loss data, errors and control failure reporting.

Allocation of clear responsibilities for operational risk management ensures that risks are identified, monitored, managed and mitigated, in line with the Bank's risk appetite.

The Bank uses the Basic Indicator Approach (BIA) to calculate operational risk capital requirements under Pillar I. Under the BIA the capital requirement for operational risk is 15% of the three year average of gross income as defined by Article 315 of the CRR.

## 4.7 Residual asset value risk

Residual value risk is the risk that the realisation based residual value set at the start of a lease is not achieved at the end of the lease. This may be due to a number of factors, including lower than expected equipment resale value, changes in customer behaviour or higher fulfilment costs and/ or end of lease operating expenses. The Bank seeks to minimise losses arising from residual value risk by understanding the equipment leased, identifying long-term customer behaviour and applying expert judgement when determining residual values in order to provide a balanced view of expected realisation.

The Bank's Asset Management End of Lease ("EOL") function utilises analysis of historic remarketing, renewal and extension data to determine the average end of lease recovery. The knowledge, global experience and expert judgement of Management along with historically achieved remarketing values are used to derive Recovery Based Residuals ("RBR").

The Residual Asset Risk Committee is responsible for the setting, validation and monitoring of the residual risk for the Bank. The Bank has established internal controls, with defined limits and regular reporting for residual value risk exposures within and across its portfolios.



## 4.8 Other risks

### a) Capital Adequacy Risk

Capital adequacy is assessed under the Bank's ICAAP framework. The treasury function manages the Bank's capital strategy under the guidance of the Board. The Bank is committed to maintaining its sound capitalisation. The Bank has equity share capital of €50 million and capital contributions received of €342.5 million at 31 December 2017.

The Bank's objectives when managing capital are:

- To comply with Pillar I and Pillar II capital requirements set by the Regulator
- To safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns to shareholders and benefits for other stakeholders
- To maintain a strong capital base to support the development of its business
- To meet the financial covenant on our revolving credit facility

Capital adequacy and the use of regulatory capital are monitored weekly by the Bank's Regulatory function. The Bank has considered the capital and other related requirements which apply to it through the following key legislation and requirements:

- CRD IV
- Relevant EBA technical standards
- The CBI Pillar II capital assessment
- Central Bank's Licensing and Supervision Standards and Requirements
- Banking Recovery and Resolution Directive (BRRD)

The Bank holds own funds in the form of capital which will always be more than or equal to the higher of capital requirements calculated under Pillar I or Pillar II.

The Bank monitors a range of ratios which have been set at, or in excess of, its minimum regulatory requirements and are designed to reflect the Bank's risk appetite. This takes into consideration the impact of CRD IV phasing arrangements. The ratios provide a mechanism to monitor compliance and include early warning triggers to allow management to take appropriate timely action should the Bank approach a limit. Per the terms of the license with the Central Bank of Ireland, the Bank has committed to maintain a solvency ratio that is in excess of the minimum required under CRD IV.

The Bank must comply with the 2014 Banking Recovery and Resolution Directive (BRRD) and any supplementary regulation, associated EBA guidelines and standards that are issued as part of its implementation. The purpose of the BRRD is to establish a framework for the recovery and resolution of institutions which are failing or likely to fail. Under the BRRD the Bank must prepare and submit (on at least an annual basis) a Board approved Recovery plan to the CBI. The Bank must also provide information to the CBI to enable the preparation of a Resolution plan for the Bank.

### b) Regulatory Compliance Risk

Regulatory risk is the risk to earnings, capital and reputation arising from non-compliance with banking regulations, anti-money laundering, data protection, and other associated requirements. Upstream risk is the risk arising from a new regulatory requirements or from regulations becoming applicable due to a change in the nature or scope of the Bank's activities. The Bank has zero appetite for censure from regulatory, political or legislative bodies.

### **c) Reputational Risk**

Reputational Risk is the risk to the Dell brand, or goodwill exhibited towards that brand, by the Bank's customers and wider market. Reputational risk includes social, ethical and environmental risks for the purpose of this Framework.

The Bank will not enter into activities that will knowingly give rise to reputational risk issues with the potential to materially damage the Dell brand. The Bank seeks to ensure that outsourced activities meet the Bank's reputational risk standards, including the treatment and disposal of hardware.

### **d) Business & Strategy Risk**

Business & Strategic Risk arises from adverse and unexpected changes in income, costs or profitability that are due to the Bank's business model, its strategy, and decisions made by Board and Senior Management. The Bank considers effective governance to be the most appropriate mitigant against this risk category. Business & Strategic Risk is included in the ICAAP and ILAAP assessments.

Business and Strategy Risk also includes Brexit risks (risks and uncertainties arising from the UK's decision to withdraw from the EU) since as well as implications for trade and for both the UK and Irish economies, there are potentially negative consequences for the Bank's customers as well as for its operations in terms of currency fluctuations, legal and regulatory changes and people impacts. The Bank has devised robust plans to deal with any potential impacts arising from Brexit.

The impacts of the General Data Protection Regulation (GDPR) which comes into force on 25<sup>th</sup> May 2018 is a key focus for the Bank.

### **e) Group Risk**

Group Risk arises from reliance on Dell Inc. for financial and operational support, including funding and outsourced activities. Group risk includes the risk of negative impact on the Bank from other Group entities which may disrupt outsourced activities of the Bank, or may impact the Bank's ability to operate effectively. The Bank considers effective governance to be the most appropriate mitigant against this risk category. Group Risk is included in the ICAAP and ILAAP assessments.

## 5. Encumbered Assets

An asset should be treated as encumbered if it has been pledged or if it is subject to any form of arrangement to secure, collateralise or credit-enhance any on-balance-sheet or off-balance-sheet transaction from which it cannot be freely withdrawn (for instance, to be pledged for funding purposes).

The Bank has a third party Collateralised Loan Agreement (CLA) in place since 2014 and a securitisation facility (SPV) was put in place in January 2017. At 31 December 2017 the CLA facility was €400 million of which €261 million was drawn and the SPV facility was €600 million of which €333 million was drawn. The following table splits the Bank's balance sheet by asset type and encumbered and unencumbered assets.

### Encumbered and unencumbered assets

| <i>In thousands of Euro</i>                | 2017                                 |  | 2016                                 |  |
|--|--------------------------------------|--|--------------------------------------|--|
|  | Carrying amount of encumbered assets | Carrying amount of unencumbered assets | Carrying amount of encumbered assets | Carrying amount of unencumbered assets |
| <b>Assets of the reporting institution</b> | 730,948                              | 770,379                                | 505,570                              | 557,140                                |
| Equity instruments                         | 0                                    | 0                                      | 0                                    | 0                                      |
| Debt securities                            | 0                                    | 0                                      | 0                                    | 0                                      |
| Other assets                               | 730,948                              | 770,379                                | 505,570                              | 557,140                                |

### Liabilities associated with encumbered assets

| <i>In thousands of Euro</i>                       | 2017  |   | 2016  |   |
|---|---|---|---|---|
|   | Matching liabilities, contingent liabilities or securities lent | Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered | Matching liabilities, contingent liabilities or securities lent | Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered |
| Carrying amount of selected financial liabilities | 593,669 <sup>10</sup>   | 730,948   | 428,481 <sup>11</sup>   | 505,570   |

<sup>10</sup> Carrying amount of matching liabilities refers to the amount drawn by DBID on the collateralised loan & securitised loan.

<sup>11</sup> Carrying amount of matching liabilities refers to the amount drawn by DBID on the collateralised loan & securitised loan.

## 6. Leverage

The CRD IV leverage ratio is designed to restrict the build-up of leverage in the Banking sector. It is a simple, non-risk-weighted measure.

The leverage ratio is calculated as Tier One Capital/Total Exposures. As at December 2017 total Exposures of the Bank consist of;

- On-balance sheet exposures
- Derivatives exposures at replacement cost plus an add-on for potential future exposure;
- Off-balance sheet items (Committed Facilities and Guarantees).

While the ratio is not binding until 2018<sup>12</sup>, Appendix 4 contains the full leverage ratio disclosure template completed for the Bank as at December 2017. The Leverage Ratio as at December 2017 was 18.89% compared to a minimum regulatory target of 3%.

### **Process used to manage the risk of excessive leverage**

The Bank does not engage in proprietary trading and only engages in derivatives for the purpose of hedging interest rate and foreign exchange risk. The Bank is well capitalised and has a capital surplus in excess of the regulatory minimum as at December 2017. The Bank's Risk function ensure that all activities in the Bank are within the ranges specified in the Bank's risk appetite statement. The Leverage Ratio is one of the suite of key internal risk indicators and is monitored on a monthly basis by the Bank's Risk function. The Bank's primary business is leasing. The Bank borrows funds with the sole intention of facilitating growth in its business. The Bank's funding base primarily consists of private secured funding and intergroup borrowing. Liquidity in the Bank is managed with a focus on maturity transformation of cash flows.

### **Factors that had an impact on the leverage ratio during 2017**

The Bank's balance sheet grew by 40% during 2017. This represents a growth of €441 million in Assets. The other primary factor that impacted the Leverage Ratio during the year was a capital contribution of €25 million which the Bank received from Dell Inc.

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<sup>12</sup> As per European Commission [http://europa.eu/rapid/press-release\\_MEMO-14-580\\_en.htm](http://europa.eu/rapid/press-release_MEMO-14-580_en.htm)

## 7. Remuneration disclosures

The Bank's strategy with regards to remuneration of employees and members of the Board of Directors is to attract, retain and motivate the talent needed to drive the growth of the business. The Bank executes this strategy by: providing market-competitive base and incentive pay; motivating performance toward key company objectives; and supporting and enhancing our strong meritocracy – the Bank values accountability and seeks to reward team and team members who continually improve their capability and increase their contribution.

The Bank's approach to remuneration includes the following factors: the Bank's business strategy and business plan performance; the performance of the Dell Group; market factors; Dell Group governance and standards, including group remuneration policies and standards; and applicable regulatory requirements & standards.

### 7.1 Remuneration components

The Bank's remuneration components are derived from the individual job role, including responsibility and job complexity, performance and benchmarking to relevant market data, pay and conditions. The key remuneration components include: base pay remuneration; performance-based remuneration; pension scheme; other benefits; and severance schemes. The Bank's remuneration policy also includes deferral and instrument elements reflective of the non-complex risk profile of the institution.

#### Base pay remuneration

Base pay or "fixed" remuneration is determined primarily by the job role definition, employee individual performance and external market benchmarking.

#### Performance-based remuneration

Performance-based or "variable" remuneration is awarded in a manner which promotes sound risk management and does not induce excessive risk-taking while maintaining an appropriate balance of fixed and variable remuneration.

Performance based remuneration also takes account of the Bank's business plan performance and that of the performance of the Dell Group, including modifiers (a percentage multiplier) which reflects performance of the Dell Group and individual performance.

The Bank also makes use of Dell Group's long-term incentive programme for the purposes of staff retention. Awards to Identified Staff (see section 7.2) vest over a deferral period in accordance regulatory requirements.

It is to be noted that variable remuneration may not be payable in full or in part on the basis of unsustainable results.

#### Variable Pay Instrument

Dell Bank is a relatively small, non-complex institution. Its strategy, product offering, market share and size place it in the category of a non-systemically important institution. In 2016 the Bank continued to apply the principle of proportionality, including neutralising the requirement to defer a portion of variable pay and the requirement to pay a certain portion of variable pay in instruments.

However, effective from 1 January 2017, under the Guidelines on Sound Remuneration Policies (Guidelines), the Bank is no longer permitted to neutralise the above requirements. Therefore Dell Bank has developed a Variable Remuneration Plan to satisfy the variable remuneration requirements in a proportionate manner. The Variable Remuneration Plan includes deferral and instrument requirements in accordance with the Guidelines. This new structure for variable pay was first applied to variable awards for Identified Staff for the performance year 2017.

## Risk Alignment

In order to achieve risk alignment, variable remuneration is performance-based and subject to risk-adjustments as deemed appropriate, including malus and clawback provisions. A portion of variable pay awarded to Identified Staff is deferred over a period of time (not less than three years) to align with the business cycle of the Bank and also taking into consideration the current and expected future risk profile.

## 7.2 Identified Staff

Identified Staff are defined as those individuals whose professional activities have a material impact on the Bank's risk profile. The Remuneration and Nominations Committee shall be responsible for determining those groups, categories of employees or individuals that fall within the definition of Identified Staff. In determining those individuals to be included as Identified Staff the Remuneration and Nominations Committee will at a minimum consider the following staff members;

- Executive members of the Bank's corporate bodies
- Senior management with responsibility for day-to-day management
- Staff with responsibility for independent control functions
- Other risk takers
- Staff whose total remuneration is in the same bracket as senior managers and risk-takers

The following roles were deemed Identified Staff as at December 2017:

- Directors of the Bank
- Managing Director
- Chief Financial Officer
- Chief Risk Officer
- Chief Credit Officer
- Chief Compliance Officer
- Legal Director
- Treasurer
- Head of Internal Audit
- Chief Information Officer
- Operations Director
- Branch manager
- Business Development Director

There are twelve employees of the Bank (excluding non-executive directors) included in the Identified Staff (the same twelve roles compared to 2016). The process for determining the identification of staff who have a material impact on the institution's risk profile is carried out on an annual basis, or as required. It takes into account the qualitative and quantitative identification criteria set out in the EBA Regulatory Technical Standard on Identified Staff. The Chief Risk Officer is responsible for carrying out the Identified Staff assessment. The results are presented to the Remuneration and Nominations Committee for their review and recommendation to the Board for approval.

Aggregate quantitative data as at 31 December 2017 is detailed in the table below:

|  | Finance & Management | Control Functions | Operations and Other | Total     |
|--|----------------------|-------------------|----------------------|-----------|
| <b>Total Fixed Remuneration</b>                      | 704,668              | 804,658           | 501,826              | 2,011,152 |
| <b>Total Variable Remuneration</b>                   | 702,564              | 383,756           | 236,294              | 1,322,614 |
| <b>Ratio between variable and fixed remuneration</b> | 99.7%                | 47.7%             | 47.1%                | 65.8%     |

The Bank is compliant with the remuneration ratio requirements as set by CRR and CRD. In accordance with article 94 (1) (g) (i) of the CRD, the variable component shall not exceed 100% of the fixed component of the total remuneration for each individual. The Bank has adhered to the conditions set out in article 94 (1) (g) (ii) of the CRD which allows for the ratio to be increased to 200% for certain individuals.

|  | Senior Management | Other material risk takers |
|--|-------------------|----------------------------|
| Number of Identified Staff                                 | 11                | 1                          |
| Total value of remuneration awards for performance in 2017 |                   |                            |
| <b>Fixed Remuneration</b>                                  | <b>1,860,883</b>  | <b>150,269</b>             |
| <i>Cash-based (paid out)</i>                               | <i>1,860,883</i>  | <i>150,269</i>             |
| <b>Variable Remuneration</b>                               | <b>1,303,658</b>  | <b>18,956</b>              |
| <i>Cash-based (paid out)</i>                               | <i>315,626</i>    | <i>5,687</i>               |
| Deferred:  |                   |                            |
| <i>Cash-based (vested)</i>                                 | <i>184,958</i>    | <i>13,269</i>              |
| <i>Other instruments (unvested)</i>                        | <i>803,074</i>    | <i>-</i>                   |

### Remuneration over €1 million

During 2017 no individual designated as Identified Staff received remuneration over €1 million.

### Sign-On Bonuses

During 2017 no sign-on bonus was paid to any individual designated as Identified Staff.

### Severance Payment

During 2017 no severance payment was made to an individual designated as Identified Staff.

### 7.3 Remuneration Governance

The Board of Directors is the ultimate decision making body for the Bank. It has delegated certain responsibilities to the Bank's Remuneration and Nominations Committee. This committee meets at the same frequency as the main Board. In general the Bank implements the Remuneration Policies and practices of the Dell Group with the oversight of the Remuneration Committee and the Board of Directors. Board directors that are not part of Dell Group receive a fixed annual fee. Directors employed by the Dell Group receive no fee for Board membership.

The Bank's remuneration policy is reviewed by the Remuneration & Nominations Committee and recommended to the Board for approval on an annual basis.



## 8. Appendices

### Appendix 1 – Own Funds Disclosure

| Ref   | Own funds disclosure template  | 2017                                | (b)<br>Regulation<br>(EU) no<br>575/2013<br>article<br>reference | 2016                                |
|---|--|-------------------------------------|--|-------------------------------------|
|   |  | (a) Amount<br>at disclosure<br>date |  | (a) Amount<br>at disclosure<br>date |
| Common Equity Tier 1 capital: instruments and reserves      |  |                                     |  |                                     |
| 1   | Capital instruments and the related share premium accounts   | 50,018,000                          | 26 (1), 27, 28, 29   | 50,018,000                          |
|   | of which: Instrument type 1  |                                     | EBA list 26 (3)  |                                     |
|   | of which: Instrument type 2  |                                     | EBA list 26 (3)  |                                     |
|   | of which: Instrument type 3  |                                     | EBA list 26 (3)  |                                     |
| 2   | Retained earnings  | (66,505,038)                        | 26 (1) (c)   | (67,257,460)                        |
| 3   | Accumulated other comprehensive income (and other reserves)  | 342,500,000                         | 26 (1)   |                                     |
| 3a  | Funds for general banking risk   |                                     | 26 (1) (f)   | 317,500,000                         |
| 4   | Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1  |                                     | 486 (2)  |                                     |
| 5   | Minority interests (amount allowed in consolidated CET1)   |                                     | 84, 479, 480   |                                     |
| 5a  | Independently reviewed interim profits net of any foreseeable charge or dividend   |                                     | 26 (2)   |                                     |
| 6   | Common Equity Tier 1 (CET1) capital before regulatory adjustments  | 326,012,962                         | Sum of rows 1 to 5a  | 300,260,540                         |
| Common Equity Tier 1 (CET1) capital: regulatory adjustments |  |                                     |  |                                     |
| 7   | Additional value adjustments (negative amount)   |                                     | 34, 105  |                                     |
| 8   | Intangible assets (net of related tax liability) (negative amount)   | (23,837,042)                        | 36 (1) (b), 37   | (28,062,151)                        |
| 9   | Empty set in the EU  |                                     |  |                                     |
| 10  | Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount) | (3,250,200)                         | 36 (1) (c), 38,  | (3,657,022)                         |
| 11  | Fair value reserves related to gains or losses on cash flow hedges   |                                     | 33(1) (a)  |                                     |
| 12  | Negative amounts resulting from the calculation of expected loss amounts   |                                     | 36 (1) (d), 40, 159  |                                     |
| 13  | Any increase in equity that results from securitised assets (negative amount)  |                                     | 32 (1)   |                                     |
| 14  | Gains or losses on liabilities valued at fair value resulting from changes in own credit standing  |                                     | 33(1) (b)  |                                     |
| 15  | Defined-benefit pension fund assets (negative amount)  |                                     | 36 (1) (e), 41   |                                     |
| 16  | Direct and indirect holdings by an institution of own CET1 instruments (negative amount)   |                                     | 36 (1) (f), 42   |                                     |

| Ref | Own funds disclosure template   | 2017                                | (b)<br>Regulation<br>(EU) no<br>575/2013<br>article<br>reference | 2016                                |
|-----|---|-------------------------------------|--|-------------------------------------|
|     |   | (a) Amount<br>at disclosure<br>date |  | (a) Amount<br>at disclosure<br>date |
| 17  | Direct, indirect and synthetic holdings of the CET 1 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)                        |                                     | 36 (1) (g), 44   |                                     |
| 18  | Direct, indirect and synthetic holdings by the institution 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) |                                     | 36 (1) (h), 43, 45, 46, 49 (2) (3), 79                           |                                     |
| 19  | Direct, indirect and synthetic holdings by the institution 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)           |                                     | 36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79            |                                     |
| 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  |                                     | 36 (1) (k)   |                                     |
| 20b | of which: qualifying holdings outside the financial sector (negative amount)  |                                     | 36 (1) (k) (i), 89 to 91   |                                     |
| 20c | of which: securitisation positions (negative amount)  |                                     | 36 (1) (k) (ii), 243 (1) (b), 244 (1) (b), 258                   |                                     |
| 20d | of which: free deliveries (negative amount)   |                                     | 36 (1) (k) (iii), 379 (3)  |                                     |
| 21  | Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)  |                                     | 36 (1) (c), 38, 48 (1) (a)                                       |                                     |
| 22  | Amount exceeding the 15% threshold (negative amount)  |                                     | 48 (1)   |                                     |
| 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   |                                     | 36 (1) (i), 48 (1) (b)   |                                     |
| 24  | Empty set in the EU   |                                     |  |                                     |
| 25  | of which: deferred tax assets arising from temporary differences  |                                     | 36 (1) (c), 38, 48 (1) (a)                                       |                                     |
| 25a | Losses for the current financial year (negative amount)   |                                     | 36 (1) (a)   | (4,678,010)                         |
| 25b | Foreseeable tax charges relating to CET1 items (negative amount)  |                                     | 36 (1) (l)   |                                     |

| Ref  | Own funds disclosure template  | 2017                                | (b)<br>Regulation<br>(EU) no<br>575/2013<br>article<br>reference | 2016                                   |
|--|--|-------------------------------------|--|--|
|  |  | (a) Amount at<br>disclosure<br>date |  | (a) Amount<br>at<br>disclosure<br>date |
| 26   | Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468  |                                     |  |  |
|  | Of which: ...filter for unrealised loss 1  |                                     | 467  |  |
|  | Of which: ...filter for unrealised loss 2  |                                     | 467  |  |
|  | Of which: ...filter for unrealised gain 1  |                                     | 468  |  |
|  | Of which: ...filter for unrealised gain 2  |                                     | 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  |                                     | 481  |  |
|  | Of which: ...  |                                     | 481  |  |
| 27   | Qualifying AT1 deductions that exceed the AT1 capital of the institution (negative amount)   |                                     | 36 (1) (j)   |  |
| 28   | Total regulatory adjustments to Common Equity Tier 1 (CET1)  | (27,087,242)                        | Sum of rows 7 to 20a, 21, 22 and 25a to 27                       | (36,397,183)                           |
| 29   | Common Equity Tier 1 (CET1) capital  | 298,925,720                         | Row 6 minus Row 28   | 263,863,356                            |
| <b>Additional Tier 1 (AT1) capital: instruments</b>            |  |                                     |  |  |
| 30   | Capital instruments and the related share premium accounts   |                                     | 51, 52   |  |
| 31   | of which: classified as equity under applicable accounting standards   |                                     |  |  |
| 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   |                                     | 486 (3)  |  |
| 34   | Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties   |                                     | 85, 86   |  |
| 35   | of which: instruments issued by subsidiaries subject to phase out  |                                     | 486 (3)  |  |
| 36   | Additional Tier 1 (AT1) capital before regulatory adjustments  |                                     | Sum of rows 30, 33 and 34  |  |
| <b>Additional Tier 1 (AT1) capital: regulatory adjustments</b> |  |                                     |  |  |
| 37   | Direct and indirect holdings by an institution of own AT1 instruments (negative amount)  |                                     | 52 (1) (b), 56 (a), 57   |  |
| 38   | Direct, indirect and synthetic 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) |                                     | 56 (b), 58   |  |

| Ref | Own funds disclosure template   | 2017                          | (b)<br>Regulation (EU) no 575/2013 article reference                               | 2016                          |
|-----|---|-------------------------------|--|-------------------------------|
|     |   | (a) Amount at disclosure date |  | (a) Amount at disclosure date |
| 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) |                               | 56 (c), 59, 60, 79   |                               |
| 40  | Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)                       |                               | 56 (d), 59, 79   |                               |
| 41  | Regulatory adjustments applied to additional tier 1 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)                              |                               |  |                               |
| 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   |                               | 472, 472(3)(a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a) |                               |
|     | Of which items to be detailed line by line, e.g. Material net interim losses, intangibles, shortfall of provisions to expected losses etc   |                               |  |                               |
| 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   |                               | 477, 477 (3), 477 (4) (a)  |                               |
|     | Of which items to be detailed line by line, e.g. Reciprocal cross holdings in Tier 2 instruments, direct holdings of non-significant investments in the capital of other financial sector entities, etc   |                               |  |                               |
| 41c | Amount to be deducted from or added to Additional Tier 1 capital with regard to additional filters and deductions required pre- CRR   |                               | 467, 468, 481  |                               |
|     | Of which: ...possible filter for unrealised losses  |                               | 467  |                               |
|     | Of which: ...possible filter for unrealised losses  |                               | 468  |                               |
|     | Of which: ...   |                               | 481  |                               |
| 42  | Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)  |                               | 56 (e)   |                               |
| 43  | Total regulatory adjustments to Additional Tier 1 (AT1) capital   |                               | Sum of rows 37 to 42   |                               |
| 44  | Additional Tier 1 (AT1) capital   |                               | Row 36 minus row 43  |                               |

| Ref  | Own funds disclosure template  | 2017                          | (b)<br>Regulation (EU) no 575/2013 article reference | 2016                          |
|--|--|-------------------------------|--|-------------------------------|
|  |  | (a) Amount at disclosure date |  | (a) Amount at disclosure date |
| 45   | Tier 1 capital (T1 = CET1 + AT1)   | 298,925,720                   | Sum of row 29 and row 44                             | 263,863,356                   |
| <b>Tier 2 (T2) capital: instruments and provisions</b> |  |                               |  |                               |
| 46   | Capital instruments and the related share premium accounts   | 65,000,000                    | 62, 63   | 65,000,000                    |
| 47   | Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2  |                               | 486 (4)  |                               |
|  | Public sector capital injections grandfathered until 1 January 2018  |                               | 483 (4)  |                               |
| 48   | Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties  |                               | 87, 88   |                               |
| 49   | of which: instruments issued by subsidiaries subject to phase out  |                               | 486 (4)  |                               |
| 50   | Credit risk adjustments  | 2,284,080                     | 62 (c) & (d)   | 2,136,354                     |
| 51   | Tier 2 (T2) capital before regulatory adjustments  | 67,284,080                    |  | 67,136,354                    |
| <b>Tier 2 (T2) capital: regulatory adjustments</b>     |  |                               |  |                               |
| 52   | Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)  |                               | 63 (b) (i), 66 (a), 67                               |                               |
| 53   | Holdings of the T2 instruments and subordinated loans 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)                          |                               | 66 (b), 68   |                               |
| 54   | Direct and indirect 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) |                               | 66 (c), 69, 70, 79                                   |                               |
| 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 and indirect holdings by the institution 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 amount)                       |                               | 66 (d), 69, 79                                       |                               |
| 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)  | (1,142,040)                   |  | (854,541)                     |

| Ref | Own funds disclosure template   | 2017                          | (b)  | 2016                          |
|-----|---|-------------------------------|--|-------------------------------|
|     |   | (a) Amount at disclosure date | Regulation (EU) no 575/2013 article reference                                      | (a) Amount at disclosure date |
| 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  |                               | 472, 472(3)(a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a) |                               |
|     | Of which items to be detailed line by line, e.g. Material net interim losses, intangibles, shortfall of provisions to expected losses etc   |                               |  |                               |
| 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   |                               | 475, 475 (2) (a), 475 (3), 475 (4) (a)   |                               |
|     | Of which items to be detailed line by line, e.g. reciprocal cross holdings in at1 instruments, direct holdings of non significant investments in the capital of other financial sector entities, etc  |                               |  |                               |
| 56c | Amount to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre CRR   |                               | 467, 468, 481  |                               |
|     | Of which: ...possible filter for unrealised losses  |                               | 467  |                               |
|     | Of which: ...possible filter for unrealised losses  |                               | 468  |                               |
|     | Of which: ...   |                               | 481  |                               |
| 57  | Total regulatory adjustments to Tier 2 (T2) capital   | (1,142,040)                   | Sum of rows 52 to 56   | (854,541)                     |
| 58  | Tier 2 (T2) capital   | 66,142,040                    | Row 51 minus row 57  | 66,281,812                    |
| 59  | Total capital (TC = T1 + T2)  | 365,067,760                   | Sum of row 45 and row 58   | 330,145,169                   |
| 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 amounts)   | 4,027,153                     |  | 6,570,015                     |
|     | 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) | 4,027,153                     | 472, 472 (5), 472 (8) (b), 472 (10) (b), 472 (11) (b)                              | 6,570,015                     |

| Ref   | Own funds disclosure template   | 2017                          | (b)   | 2016                          |
|---|---|-------------------------------|---|-------------------------------|
|   |   | (a) Amount at disclosure date | Regulation (EU) no 575/2013 article reference       | (a) Amount at disclosure date |
|   | 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)  |                               | 475, 475<br>(2) (b), 475<br>(2) (c), 475<br>(4) (b) |                               |
|   | 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) |                               | 477, 477<br>(2) (b), 477<br>(2) (c), 477<br>(4) (b) |                               |
| 60  | Total risk weighted assets  | 1,471,868,329                 |   | 1,015,732,484                 |
| <b>Capital ratios and buffers</b>   |   |                               |   |                               |
| 61  | Common Equity Tier 1 (as a percentage of total risk exposure amount)  | 20.31%                        | 92 (2) (a)  | 25.98%                        |
| 62  | Tier 1 (as a percentage of total risk exposure amount)  | 20.31%                        | 92 (2) (b)  | 25.98%                        |
| 63  | Total capital (as a percentage of total risk exposure amount)   | 24.80%                        | 92 (2) (c)  | 32.50%                        |
| 64  | Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus systemically important institution buffer expressed as a percentage of risk exposure amount)   | 5.8687%                       | CRD 128, 129, 130, 131, 133                         | 5.2573%                       |
| 65  | of which: capital conservation buffer requirement   | 1.25%                         |   | 0.625%                        |
| 66  | of which: countercyclical buffer requirement  | 0.1187%                       |   | 0.1323%                       |
| 67  | of which: systemic risk buffer requirement  |                               |   |                               |
| 67a   | of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer  |                               |   |                               |
| 68  | Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)  |                               | CRD 128   |                               |
| 69  | [non relevant in EU regulation]   |                               |   |                               |
| 70  | [non relevant in EU regulation]   |                               |   |                               |
| 71  | [non relevant in EU regulation]   |                               |   |                               |
| <b>Amounts below the thresholds for deduction (before risk weighting)</b> |   |                               |   |                               |
| 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)  |                               | 36 (1) (h), 46, 45, 56 (c), 59, 60, 66 (c), 69, 70  |                               |
| 73  | 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 (amount below 10% threshold and net of eligible short positions)  |                               | 36 (1) (i), 45, 48                                  |                               |
| 74  | Empty set in the EU   |                               |   |                               |

| Ref   | Own funds disclosure template  | 2017                          | (b)   | 2016                          |
|---|--|-------------------------------|---|-------------------------------|
|   |  | (a) Amount at disclosure date | Regulation (EU) no 575/2013 article reference | (a) Amount at disclosure date |
| 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) | 2,353,760                     | 36 (1) (c), 38, 48                            | 187,000                       |
| 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)                            | 1,142,040                     | 62  | 1,281,812                     |
| 77  | Cap on inclusion of credit risk adjustments in T2 under standardised approach  | 16,647,667                    | 62  | 11,225,189                    |
| 78  | Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)                  |                               | 62  |                               |
| 79  | Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach   |                               | 62  |                               |
| 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  |                               | 484 (3), 486 (2) & (5)                        |                               |
| 81  | Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)  |                               | 484 (3), 486 (2) & (5)                        |                               |
| 82  | Current cap on AT1 instruments subject to phase out arrangements   |                               | 484 (4), 486 (3) & (5)                        |                               |
| 83  | Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)   |                               | 484 (4), 486 (3) & (5)                        |                               |
| 84  | Current cap on T2 instruments subject to phase out arrangements  | 50.0%                         | 484 (5), 486 (4) & (5)                        | 60.0%                         |
| 85  | Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)  |                               | 484 (5), 486 (4) & (5)                        |                               |



## Appendix 2 – Capital Instruments Disclosure

|   | Capital Type 2              |
|---|-----------------------------|
|   | EURO                        |
| Issuer  | DGBV                        |
| Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)                | N/A                         |
| Governing law(s) of the instrument  | Courts of Ireland           |
| Regulatory treatment  |                             |
| Transitional CRR rules  | Tier 2                      |
| Post-transitional CRR rules   | Tier 2                      |
| Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated                                    | Solo & Consolidated         |
| Instrument type (types to be specified by each jurisdiction)                                    | Subordinated Loan           |
| Amount recognised in regulatory capital (Currency in million, as of most recent reporting date) | €65,000,000                 |
| Nominal amount of instrument  | €65,000,000                 |
| Issue price   | €65,000,000                 |
| Redemption price  | €65,000,000                 |
| Accounting classification   | Liability – amortised cost  |
| Original date of issuance   | 4th June 2013               |
| Perpetual or dated  | Dated                       |
| Original maturity date  | 1st June 2023               |
| Issuer call subject to prior supervisory approval   | Yes                         |
| Optional call date, contingent call dates and redemption amount                                 | N/A                         |
| Subsequent call dates, if applicable  | N/A                         |
| Coupons / dividends   |                             |
| Fixed or floating dividend/coupon   | Floating                    |
| Coupon rate and any related index   | 3 month Euro Libor + 280bps |
| Existence of a dividend stopper   | N/A                         |
| Fully discretionary, partially discretionary or mandatory (in terms of timing)                  | N/A                         |
| Fully discretionary, partially discretionary or mandatory (in terms of amount)                  | N/A                         |
| Existence of step up or other incentive to redeem   | N/A                         |
| Noncumulative or cumulative   | N/A                         |
| Convertible or non-convertible  | Nonconvertible              |
| If convertible, conversion trigger(s)   | N/A                         |
| If convertible, fully or partially  | N/A                         |
| If convertible, conversion rate   | N/A                         |
| If convertible, mandatory or optional conversion  | N/A                         |
| If convertible, specify instrument type convertible into  | N/A                         |
| If convertible, specify issuer of instrument it converts into                                   | N/A                         |
| Write-down features   | NO                          |
| If write-down, write-down trigger(s)  | N/A                         |
| If write-down, full or partial  | N/A                         |

Capital Type 2

|   |   |
|---|---|
|   | EURO  |
| If write-down, permanent or temporary   | N/A   |
| If temporary write-down, description of write-up mechanism  | N/A   |
| Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Ranks ahead of the holders of shares from time to time issued by the Borrower in the share capital of the Borrower and rank junior to all Senior Liabilities. |
| Non-compliant transitioned features   | NO  |
| If yes, specify non-compliant features  | N/A   |

### Appendix 3 – Own Funds and Audit Financial Statements Reconciliation

|                           | Audited Financial Statements<br>31 December 2017 | Regulatory Own Funds<br>31 December 2017 | Variance           | Comments   |
|---------------------------|--|--|--------------------|--|
| Share Premium             | -  | -  | -                  |  |
| Paid in Capital           | 50,000,001                                       | 50,018,000                               | (17,999)           | Variance relates to additional capital held at the consolidated level. Financial Statements are audited at solo level (DBID) |
| Reserves                  | 276,053,235                                      | 275,994,962                              | 58,273             | Difference in reserves at consolidated level   |
| Intangible Assets         | (23,837,042)                                     | (23,837,042)                             | -                  |  |
| Year End Losses           | -  | -  | -                  |  |
| Deferred Tax Assets       | (9,631,160)                                      | (3,250,200)                              | (6,380,960)        | Variance due to treatment of DTA for capital purposes  |
| <b>Core Equity Tier 1</b> | <b>292,585,034</b>                               | <b>298,925,720</b>                       | <b>(6,340,686)</b> | <b>Total of above</b>  |
| Subordinated Debt         | 65,000,000                                       | 65,000,000                               | -                  |  |
| IBNR Provisions           | 2,284,080  | 1,142,040                                | 1,142,040          | Variance due to transitional adjustments for IBNR provisions as T2 capital   |
| <b>Tier 2</b>             | <b>67,284,080</b>                                | <b>66,142,040</b>                        | <b>1,142,040</b>   | <b>Variance due to transitional adjustments for IBNR provisions as T2 capital</b>  |
| <b>Total Capital</b>      | <b>359,869,114</b>                               | <b>365,067,760</b>                       | <b>5,198,646</b>   | <b>Total of above</b>  |

## Appendix 4 – Credit Risk Analysis

### Template 7: EU CRB-B - Total and average net amount of exposures

|    |   | a   | b                                     |
|----|---|---|---------------------------------------|
|    |   | Net value of exposures at the end of the period | Average net exposures over the period |
| 16 | Central governments or central banks                                      | 175,736,446                                     | 168,237,189                           |
| 17 | Regional governments or local authorities                                 | 274,340   | 428,273                               |
| 18 | Public sector entities  |   |                                       |
| 19 | Multilateral development banks  |   |                                       |
| 20 | International organisations   |   |                                       |
| 21 | Institutions  | 185,947,287                                     | 121,532,012                           |
| 22 | Corporates  | 1,120,075,547                                   | 946,556,933                           |
| 23 | Of which: SMEs  | 130,875,723                                     | 141,949,359                           |
| 24 | Retail  |   |                                       |
| 25 | Of which: SMEs  |   |                                       |
| 26 | Secured by mortgages on immovable property                                |   |                                       |
| 27 | Of which: SMEs  |   |                                       |
| 28 | Exposures in default  | 26,512,295                                      | 39,949,871                            |
| 29 | Items associated with particularly high risk                              |   |                                       |
| 30 | Covered bonds   |   |                                       |
| 31 | Claims on institutions and corporates with a short-term credit assessment |   |                                       |
| 32 | Collective investments undertakings                                       |   |                                       |
| 33 | Equity exposures  |   |                                       |
| 34 | Other exposures   | 175,543,149                                     | 160,120,238                           |
| 35 | <b>Total standardised approach</b>  | 1,684,089,064                                   | 1,436,824,516                         |
| 36 | <b>Total</b>  | 1,684,089,064                                   | 1,436,824,516                         |

Template 8: EU CRB-C - Geographical Breakdown of Exposures

|    | a   | b                    | c                 | d                  | e                  | f                  | g                  | h                  | i                 | j                 | k                 | l                  | m                 |                      |
|----|---|----------------------|-------------------|--------------------|--------------------|--------------------|--------------------|--------------------|-------------------|-------------------|-------------------|--------------------|-------------------|----------------------|
|    | Net Value                                 |                      |                   |                    |                    |                    |                    |                    |                   |                   |                   |                    |                   |                      |
|    | EEA                                       | Finland              | France            | Germany            | Ireland            | Italy              | Netherlands        | Spain              | Sweden            | Switzerland       | United Kingdom    | Other countries    | Total             |                      |
| 7  | Central governments or central banks      | 175,424,235          | 451,958           | 31,991,504         | 10,069,748         | 48,854,548         | 28,722,337         | 7,501,219          | 19,210,356        | 6,659,191         | 312,210           | 5,887,552          | 16,075,823        | 175,736,446          |
| 8  | Regional governments or local authorities | 274,340              | -                 | -                  | 67,954             | 63                 | -                  | -                  | 251               | -                 | -                 | 163,769            | 42,303            | 274,340              |
| 12 | Institutions                              | 185,684,901          | 104,626           | 840,643            | 546,487            | 9,153,265          | 32,783             | 337,899            | 3,466             | 7,619,550         | 262,386           | 165,821,130        | 1,225,052         | 185,947,287          |
| 13 | Corporates                                | 1,093,649,642        | 19,565,718        | 195,804,801        | 226,411,852        | 35,836,714         | 111,995,897        | 89,933,725         | 74,182,568        | 56,804,278        | 26,413,931        | 211,276,765        | 71,849,298        | 1,120,075,547        |
| 16 | Exposures in default                      | 25,938,603           | 294,000           | 4,117,763          | 1,986,864          | 862,944            | 1,771,402          | 324,323            | 2,077,459         | 109,711           | 573,692           | 12,632,119         | 1,762,018         | 26,512,295           |
| 22 | Other exposures                           | 175,022,975          | 1,156,546         | 14,052,193         | 14,517,348         | 101,408,814        | 4,108,508          | 2,252,340          | 3,820,694         | 13,501,743        | 482,017           | 16,772,838         | 3,470,108         | 175,543,149          |
| 23 | <b>Total standardised approach</b>        | <b>1,655,994,697</b> | <b>21,572,848</b> | <b>246,806,904</b> | <b>253,600,253</b> | <b>196,116,348</b> | <b>146,630,927</b> | <b>100,349,506</b> | <b>99,294,794</b> | <b>84,694,473</b> | <b>28,044,236</b> | <b>412,554,173</b> | <b>94,424,602</b> | <b>1,684,089,064</b> |
| 24 | <b>Total</b>                              | <b>1,655,994,697</b> | <b>21,572,848</b> | <b>246,806,904</b> | <b>253,600,253</b> | <b>196,116,348</b> | <b>146,630,927</b> | <b>100,349,506</b> | <b>99,294,794</b> | <b>84,694,473</b> | <b>28,044,236</b> | <b>412,554,173</b> | <b>94,424,602</b> | <b>1,684,089,064</b> |

Template 9: EU CRB-D – Concentration of exposures by industry or counterparty types

|    |   | a                  | B                                | C                          | D                             | E  | F                                    | G   | H                            | I                                 | J  | K                   | L                  | m                    |
|----|---|--------------------|----------------------------------|----------------------------|-------------------------------|--|--------------------------------------|---|------------------------------|-----------------------------------|--|---------------------|--------------------|----------------------|
|    |   | Manufacturing      | Wholesale/Retail Trade & Repairs | Transportation and Storage | Information and Communication | Financial Intermediation (Excl. Monetary Financial Institutions) | Business and Administrative Services | Other Community, Social and Personal Services | Human Health and Social Work | Public Administration and Defence | Extra-Territorial Organisations and Bodies | Credit Institutions | Other              | Total                |
| 7  | Central governments or central banks      | -                  | -                                | -                          | -                             | -  | -                                    | -   | -                            | 125,615,677                       | 3,460,512                                  | -                   | 45,672,110         | 174,748,299          |
| 8  | Regional governments or local authorities | -                  | -                                | -                          | -                             | -  | -                                    | -   | -                            | 274,340                           | -  | -                   | -                  | 274,340              |
| 12 | Institutions                              | -                  | -                                | -                          | 354,815                       | -  | -                                    | -   | -                            | -                                 | -  | 185,532,348         | 14,900             | 185,902,063          |
| 13 | Corporates                                | 201,844,984        | 76,685,406                       | 35,884,373                 | 527,721,612                   | 41,504,155   | 131,154,684                          | 12,774,512                                    | 15,222,829                   | 5,948,007                         | -  | 831,970             | 71,536,386         | 1,121,108,918        |
| 16 | Exposures in default                      | 6,871,844          | 1,356,589                        | 7,026,909                  | 3,133,365                     | 302,997  | 1,288,877                            | -   | 515                          | 32,714                            | -  | -                   | 6,498,485          | 26,512,295           |
| 22 | Other exposures                           | 23,690,445         | 4,322,985                        | 1,408,145                  | 30,065,976                    | 2,021,871  | 102,768,288                          | 544,912                                       | 532,266                      | 1,078,616                         | 1,971                                      | 882,797             | 8,224,877          | 175,543,149          |
| 23 | <b>Total standardised approach</b>        | <b>232,407,273</b> | <b>82,364,980</b>                | <b>44,319,427</b>          | <b>561,275,768</b>            | <b>43,829,023</b>  | <b>235,211,849</b>                   | <b>13,319,424</b>                             | <b>15,755,610</b>            | <b>132,949,354</b>                | <b>3,462,483</b>                           | <b>187,247,115</b>  | <b>131,946,758</b> | <b>1,684,089,064</b> |
| 24 | <b>Total</b>                              | <b>232,407,273</b> | <b>82,364,980</b>                | <b>44,319,427</b>          | <b>561,275,768</b>            | <b>43,829,023</b>  | <b>235,211,849</b>                   | <b>13,319,424</b>                             | <b>15,755,610</b>            | <b>132,949,354</b>                | <b>3,462,483</b>                           | <b>187,247,115</b>  | <b>131,946,758</b> | <b>1,684,089,064</b> |

**Template 10: EU CRB-E - Maturity<sup>13</sup> of Exposures**

The Bank's credit exposures can be categorized into the following time bands:

|    | a   | b                  | c                  | d                 | e                  | f                    | g                  | h                  |                      |
|----|---|--------------------|--------------------|-------------------|--------------------|----------------------|--------------------|--------------------|----------------------|
|    | Net Exposure Value                        |                    |                    |                   |                    |                      |                    |                    |                      |
|    | Up to 3 months                            | 3 to 6 months      | 6 months to 1 year | 1-2 Years         | 2-5 Years          | Greater than 5 years | No stated maturity | Total              |                      |
| 7  | Central governments or central banks      | 144,231,636        | 747,337            | 6,433,682         | 10,792,613         | 12,543,032           | -                  | 988,146            | 175,736,446          |
| 8  | Regional governments or local authorities | 193                | 86,181             | 11,431            | 55,269             | 121,266              | -                  | -                  | 274,340              |
| 12 | Institutions                              | 108,686,109        | 975,244            | 2,941,013         | 9,079,852          | 59,931,515           | 286,220            | 4,047,334          | 185,947,287          |
| 13 | Corporates                                | 5,434,283          | 13,687,752         | 65,118,817        | 190,045,279        | 661,628,011          | 36,809,507         | 147,351,898        | 1,120,075,547        |
| 16 | Exposures in default                      | 1,602,134          | 1,589,706          | 2,863,520         | 8,139,102          | 11,493,464           | 824,369            | -                  | 26,512,295           |
| 22 | Other exposures                           | 104,340,984        | 6,910,219          | 15,634,400        | 30,522,793         | 18,132,377           | 2,376              | -                  | 175,543,149          |
| 23 | <b>Total standardised approach</b>        | <b>364,295,339</b> | <b>23,996,439</b>  | <b>93,002,863</b> | <b>248,634,908</b> | <b>763,849,665</b>   | <b>37,922,472</b>  | <b>152,387,378</b> | <b>1,684,089,064</b> |
| 24 | <b>Total</b>                              | <b>364,295,339</b> | <b>23,996,439</b>  | <b>93,002,863</b> | <b>248,634,908</b> | <b>763,849,665</b>   | <b>37,922,472</b>  | <b>152,387,378</b> | <b>1,684,089,064</b> |

<sup>13</sup> Residual Maturity

Template 20: EU CR5 - Standardised Approach<sup>14</sup>

|    | Exposure classes  | Risk weight        |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          | Total                | Of which:<br>Unrated |               |
|----|---|--------------------|----|----|-----|--------------------|-----|-------------------|-----|----------------------|-------------------|------------------|------|------|-------|--------|----------|----------------------|----------------------|---------------|
|    |   | 0%                 | 2% | 4% | 10% | 20%                | 35% | 50%               | 70% | 75%                  | 100%              | 150%             | 250% | 370% | 1250% | Others | Deducted |                      |                      |               |
| 1  | Central governments or central banks                            | 175,652,792        |    |    |     |                    |     |                   |     | 83,654               |                   |                  |      |      |       |        |          |                      | 175,736,446          | 175,736,446   |
| 2  | Regional government or local authorities                        |                    |    |    |     | 274,340            |     |                   |     |                      |                   |                  |      |      |       |        |          |                      | 274,340              | 274,340       |
| 3  | Public sector entities  |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 4  | Multilateral development banks                                  |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 5  | International organisations                                     |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 6  | Institutions  |                    |    |    |     | 108,669,567        |     | 15,695,626        |     | 60,263,507           |                   |                  |      |      |       |        |          |                      | 184,628,700          | 60,263,507    |
| 7  | Corporates  |                    |    |    |     |                    |     |                   |     | 1,047,209,833        |                   |                  |      |      |       |        |          |                      | 1,047,209,833        | 1,047,209,833 |
| 8  | Retail  |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 9  | Secured by mortgages on immovable property                      |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 10 | Exposures in default  |                    |    |    |     |                    |     |                   |     | 21,651               | 26,490,644        |                  |      |      |       |        |          |                      | 26,512,295           | 26,512,295    |
| 11 | Exposures associated with particularly high risk                |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 12 | Covered bonds   |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 13 | Institutions and corporates with a short-term credit assessment |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 14 | Collective investment undertakings                              |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 15 | Equity  |                    |    |    |     |                    |     |                   |     |                      |                   |                  |      |      |       |        |          |                      |                      |               |
| 16 | Other items   |                    |    |    |     |                    |     |                   |     | 173,189,390          |                   | 2,353,760        |      |      |       |        |          |                      | 175,543,150          | 175,543,150   |
| 17 | <b>Total</b>  | <b>175,652,792</b> |    |    |     | <b>108,943,907</b> |     | <b>15,695,626</b> |     | <b>1,280,768,035</b> | <b>26,490,644</b> | <b>2,353,760</b> |      |      |       |        |          | <b>1,609,904,764</b> | <b>1,485,539,571</b> |               |

<sup>14</sup> Exposures are post conversion factor and post risk mitigation techniques



**Template 25: EU CCR1 - Analysis of CCR exposure by approach**

|  | a        | b                                     | c                                | d    | e          | f            | g         |
|--|----------|---------------------------------------|----------------------------------|------|------------|--------------|-----------|
|  | Notional | Replacement cost/current market value | Potential future credit exposure | EEPE | Multiplier | EAD post CRM | RWAs      |
| Mark to market   |          | 11,182,297                            | 8,026,382                        |      |            | 19,208,679   | 8,550,424 |
| Original exposure  |          |                                       |                                  |      |            |              |           |
| Standardised approach  |          |                                       |                                  |      |            |              |           |
| IMM (for derivatives and SFTs)                               |          |                                       |                                  |      |            |              |           |
| <i>Of which securities financing transactions</i>            |          |                                       |                                  |      |            |              |           |
| <i>Of which derivatives and long settlement transactions</i> |          |                                       |                                  |      |            |              |           |
| <i>Of which from contractual cross- product netting</i>      |          |                                       |                                  |      |            |              |           |
| Financial collateral simple method (for SFTs)                |          |                                       |                                  |      |            |              |           |
| Financial collateral comprehensive method (for SFTs)         |          |                                       |                                  |      |            |              |           |
| VaR for SFTs   |          |                                       |                                  |      |            |              |           |
| <b>Total</b>   |          | 11,182,297                            | 8,026,382                        |      |            | 19,208,679   | 8,550,424 |

Template 28: EU CCR3 - Standardised Approach – CCR exposures by regulatory portfolio and risk

|    | Exposure classes  | Risk weight |    |    |     |             |     |            |     |     |               |            |           |      |       |        | Total         | Of which unrated |               |
|----|---|-------------|----|----|-----|-------------|-----|------------|-----|-----|---------------|------------|-----------|------|-------|--------|---------------|------------------|---------------|
|    |   | 0%          | 2% | 4% | 10% | 20%         | 35% | 50%        | 70% | 75% | 100%          | 150%       | 250%      | 370% | 1250% | Others |               |                  | Deducted      |
| 1  | Central governments or central banks                            | 175,652,792 |    |    |     |             |     |            |     |     | 83,654        |            |           |      |       |        |               | 175,736,446      | 175,736,446   |
| 2  | Regional government or local authorities                        |             |    |    |     | 274,340     |     |            |     |     |               |            |           |      |       |        |               | 274,340          | 274,340       |
| 3  | Public sector entities  |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 4  | Multilateral development banks                                  |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 5  | International organisations                                     |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 6  | Institutions  |             |    |    |     | 108,669,567 |     | 15,695,626 |     |     | 60,263,507    |            |           |      |       |        |               | 184,628,700      | 60,263,507    |
| 7  | Corporates  |             |    |    |     |             |     |            |     |     | 1,047,209,833 |            |           |      |       |        |               | 1,047,209,833    | 1,047,209,833 |
| 8  | Retail  |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 9  | Secured by mortgages on immovable property                      |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 10 | Exposures in default  |             |    |    |     |             |     |            |     |     | 21,651        | 26,490,644 |           |      |       |        |               | 26,512,295       | 26,512,295    |
| 11 | Exposures associated with particularly high risk                |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 12 | Covered bonds   |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 13 | Institutions and corporates with a short-term credit assessment |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 14 | Collective investment undertakings                              |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 15 | Equity  |             |    |    |     |             |     |            |     |     |               |            |           |      |       |        |               |                  |               |
| 16 | Other items   |             |    |    |     |             |     |            |     |     | 173,189,390   |            | 2,353,760 |      |       |        |               | 175,543,150      | 175,543,150   |
| 17 | <b>Total</b>  | 175,652,792 |    |    |     | 108,943,907 |     | 15,695,626 |     |     | 1,280,768,035 | 26,490,644 | 2,353,760 |      |       |        | 1,609,904,764 | 1,485,539,570    |               |

## Appendix 5 – Credit Quality

Template 11: EU1-A - Credit quality of exposures by exposure class

|    | a   | b                       | c                               | d                              | e                      | f  | G             |
|----|---|-------------------------|---------------------------------|--------------------------------|------------------------|--|---------------|
|    | Gross carrying values of                  |                         | Specific credit risk adjustment | General credit risk adjustment | Accumulated write-offs | Credit risk adjustment charges of the period | Net values    |
|    | Defaulted exposures                       | Non-defaulted exposures |                                 |                                |                        |  | (a+b-c-d)*    |
| 16 | Central governments or central banks      |                         | 175,742,649                     | 6,203                          |                        |  | 175,736,446   |
| 17 | Regional governments or local authorities |                         | 274,340                         |                                |                        |  | 274,340       |
| 21 | Institutions                              |                         | 185,947,287                     |                                |                        |  | 185,947,287   |
| 22 | Corporates                                |                         | 1,127,193,101                   | 7,117,554                      | 5,921,991              |  | 1,120,075,547 |
| 28 | Exposures in default                      | 27,723,703              |                                 | 1,211,408                      |                        |  | 26,512,295    |
| 34 | Other exposures                           |                         | 175,567,373                     | 24,224                         |                        |  | 175,543,149   |
| 35 | <b>Total standardised approach</b>        | 27,723,703              | 1,664,724,750                   | 8,359,389                      | 5,921,991              |  | 1,684,089,064 |
| 36 | <b>Total</b>                              | 27,723,703              | 1,664,724,750                   | 8,359,389                      | 5,921,991              |  | 1,684,089,064 |

### Template 12: EU CR1-B – Credit Quality of Exposures by Industry or Counterparty Types

|    | a   | b                       | c                               | d                              | e                      | f                              | g                             |
|----|---|-------------------------|---------------------------------|--------------------------------|------------------------|--------------------------------|-------------------------------|
|    | Gross carrying values of  |                         | Specific credit risk adjustment | General credit risk adjustment | Accumulated write-offs | Credit risk adjustment charges | Net values                    |
|    | Defaulted exposures   | Non-defaulted exposures |                                 |                                |                        |                                | (a +b-c-d) <sup>Note 21</sup> |
| 1  | Primary Industry  |                         | 11,587,048                      |                                |                        | 2,284,893                      | 11,587,048                    |
| 2  | Manufacturing   | 7,083,369               | 225,795,999                     | 472,095                        |                        | 430,964                        | 232,407,273                   |
| 3  | Electricity, Gas, Steam and Air Conditioning                        |                         | 13,218,789                      |                                |                        |                                | 13,218,789                    |
| 4  | Water Supply, Sewerage, Waste Management and Remediation Activities |                         | 908,778                         |                                |                        |                                | 908,778                       |
| 5  | Construction  | 6,560,837               | 11,581,566                      | 62,352                         |                        | 20,957                         | 18,080,051                    |
| 6  | Wholesale/Retail Trade & Repairs                                    | 1,509,359               | 81,270,254                      | 414,633                        |                        | 346,307                        | 82,364,980                    |
| 7  | Transportation and Storage  | 7,037,630               | 37,295,926                      | 14,130                         |                        | 40,716                         | 44,319,426                    |
| 8  | Hotels and Restaurants  |                         | 5,266,583                       |                                |                        | 52,714                         | 5,266,583                     |
| 9  | Information and Communication                                       | 3,412,371               | 558,142,402                     | 279,006                        |                        | 2,370,727                      | 561,275,767                   |
| 10 | Financial Intermediation (Excl. Monetary Financial Institutions)    | 317,674                 | 43,526,026                      | 14,677                         |                        | 23,630                         | 43,829,023                    |
| 11 | Real Estate, Land and Development Activities                        |                         | 13,823,148                      |                                |                        | 26,376                         | 13,823,148                    |
| 12 | Business and Administrative Services                                | 1,600,330               | 240,536,750                     | 6,925,230                      |                        | 200,720                        | 235,211,850                   |
| 13 | Other Community, Social and Personal Services                       |                         | 13,319,425                      |                                |                        | 45,137                         | 13,319,425                    |
| 14 | Education   |                         | 27,002,899                      | 1,462                          |                        | 4,850                          | 27,001,437                    |
| 15 | Human Health and Social Work  | 110,349                 | 15,755,095                      | 109,834                        |                        |                                | 15,755,610                    |
| 16 | Public Administration and Defence                                   | 91,784                  | 132,923,540                     | 65,970                         |                        | 74,000                         | 132,949,354                   |
| 17 | Extra-Territorial Organisations and Bodies                          |                         | 3,462,483                       |                                |                        |                                | 3,462,483                     |
| 18 | Central Banks   |                         | 42,060,924                      |                                |                        |                                | 42,060,924                    |
| 19 | Credit Institutions   |                         | 187,247,115                     |                                |                        |                                | 187,247,115                   |
| 20 | <b>Total</b>  | 27,723,703              | 1,664,724,750                   | 8,359,389                      |                        | 5,921,991                      | 1,684,089,064                 |

**Template 13: EU CR1-C – Credit Quality of Exposures by Geography**

|           | a                        | b                       | c                               | d                              | e                      | f                              | g                    |
|-----------|--------------------------|-------------------------|---------------------------------|--------------------------------|------------------------|--------------------------------|----------------------|
|           | Gross carrying values of |                         | Specific credit risk adjustment | General credit risk adjustment | Accumulated write-offs | Credit risk adjustment charges | Net values           |
|           | Defaulted exposures      | Non-defaulted exposures |                                 |                                |                        |                                | (a+ b -c-d)*         |
| 1         | Finland                  | 294,000                 | 21,278,848                      |                                |                        |                                | 21,572,848           |
| 2         | France                   | 4,256,328               | 242,734,001                     | 183,426                        | 253,789                |                                | 246,806,903          |
| 3         | Germany                  | 2,197,264               | 251,972,619                     | 569,631                        | 224,654                |                                | 253,600,252          |
| 4         | Ireland                  | 906,152                 | 196,008,390                     | 798,196                        | 586                    |                                | 196,116,346          |
| 5         | Italy                    | 2,015,761               | 144,917,928                     | 302,762                        | 163,825                |                                | 146,630,927          |
| 6         | Netherlands              | 424,111                 | 100,025,182                     | 99,787                         | 4,964                  |                                | 100,349,506          |
| 7         | Spain                    | 2,215,430               | 97,365,000                      | 285,636                        | 1,370,615              |                                | 99,294,794           |
| 8         | Sweden                   | 109,711                 | 84,584,762                      |                                |                        |                                | 84,694,473           |
| 9         | Switzerland              | 677,756                 | 27,470,545                      | 104,063                        | 12,808                 |                                | 28,044,238           |
| 10        | United Kingdom           | 12,850,495              | 405,704,891                     | 6,001,211                      | 1,241,685              |                                | 412,554,175          |
| 11        | Other countries          | 1,776,695               | 92,662,584                      | 14,677                         | 2,649,065              |                                | 94,424,602           |
| <b>12</b> | <b>Total</b>             | <b>27,723,703</b>       | <b>1,664,724,750</b>            | <b>8,359,389</b>               | <b>5,921,991</b>       |                                | <b>1,684,089,064</b> |

**Template 14: EU CR1-D - Ageing of Past Due exposures**

| a |                        | b                     | c                   | d                   | e                    | f                   |          |
|---|------------------------|-----------------------|---------------------|---------------------|----------------------|---------------------|----------|
|   |                        | Gross carrying values |                     |                     |                      |                     |          |
|   |                        | ≤ 30 days             | > 30 days ≤ 60 days | > 60 days ≤ 90 days | > 90 days ≤ 180 days | > 180 days ≤ 1 year | > 1 year |
| 1 | Loans                  |                       |                     |                     |                      |                     |          |
| 2 | Debt securities        |                       |                     |                     |                      |                     |          |
| 3 | <b>Total exposures</b> |                       |                     |                     |                      |                     |          |

**Template 15: EU CR1-E - Non-Performing and Forborne Exposures**

| a  |                             | b  | c                            | d                       | e                  | f                 | g                       | h  | i                           | j                 | k                           | l   | m |
|----|-----------------------------|--|------------------------------|-------------------------|--------------------|-------------------|-------------------------|--|-----------------------------|-------------------|-----------------------------|---|---|
|    |                             | Gross carrying values of performing and non-performing exposures |                              |                         |                    |                   |                         | Accumulated impairment and provisions and negative fair value adjustments due to credit risk |                             |                   |                             | Collaterals and financial guarantees received |   |
|    |                             | Of which performing but past due > 30 days and ≤ 90 days         | Of which performing forborne | Of which non-performing |                    |                   | On performing exposures |  | On non-performing exposures |                   | On non-performing exposures | Of which forborne exposures                   |   |
|    |                             |  |                              |                         | Of which defaulted | Of which impaired | Of which forborne       |  | Of which forborne           | Of which forborne |                             |   |   |
| 10 | Debt securities             |  |                              |                         |                    |                   |                         |  |                             |                   |                             |   |   |
| 20 | Loans and advances          | 1,194,237,708  | 24,886,303                   | 36,196,472              | 27,909,489         | 6,887,917         |                         | 8,607,314  |                             | 13,327,311        |                             |   |   |
| 30 | Off-balance-sheet exposures | 152,387,379  |                              |                         |                    |                   |                         |  |                             |                   |                             |   |   |

## Appendix 6 – Leverage Ratio Disclosure Template

| CRR Leverage Ratio - Disclosure Template  |   |                                |
|---|---|--------------------------------|
|   |   | Reference date                 |
|   |   | 31 December 2017               |
|   |   | Entity name                    |
|   |   | Dell Bank International d.a.c. |
|   |   | Level of application           |
|   |   | Consolidated                   |
| Table LRSum: Summary reconciliation of accounting assets and leverage ratio exposures |   |                                |
|   |   | Applicable Amounts             |
| 1   | Total assets as per published financial statements  | 1,502,375,076                  |
| 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  | 8,209,059                      |
| 5   | Adjustments for securities financing transactions "SFTs"  |                                |
| 6   | Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)  | 78,203,078                     |
| 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   | (5,969,692)                    |
| 8   | Total leverage ratio exposure   | 1,582,817,521                  |

| <b>Table LRCOM: Leverage ratio common disclosure</b>   |  |                              |
|--|--|------------------------------|
|  |  | CRR leverage ratio exposures |
| <b>On-balance sheet exposures (excluding derivatives and SFTs)</b>                                   |  |                              |
| 1  | On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)  | 1,512,493,006                |
| 2  | (Asset amounts deducted in determining Tier 1 capital)   | (27,087,242)                 |
| 3  | Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)                                   | 1,485,405,764                |
| <b>Derivative exposures</b>  |  |                              |
| 4  | Replacement cost associated with all derivatives transactions (ie net of eligible cash variation margin)                                     | 11,182,297                   |
| 5  | Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)  | 8,026,382                    |
| EU-5a  | Exposure determined under Original Exposure Method   |                              |
| 6  | Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework    |                              |
| 7  | (Deductions of receivables assets for cash variation margin provided in derivatives transactions)  |                              |
| 8  | (Exempted CCP leg of client-cleared trade exposures)   |                              |
| 9  | Adjusted effective notional amount of written credit derivatives   |                              |
| 10   | (Adjusted effective notional offsets and add-on deductions for written credit derivatives)   |                              |
| 11   | Total derivative exposures (sum of lines 4 to 10)  | 19,208,679                   |
| <b>Securities financing transaction exposures</b>  |  |                              |
| 12   | Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions   |                              |
| 13   | (Netted amounts of cash payables and cash receivables of gross SFT assets)   |                              |
| 14   | Counterparty credit risk exposure for SFT assets   |                              |
| EU-14a   | Derogation for SFTs: Counterparty credit risk exposure in accordance with Article 429b (4) and 222 of Regulation (EU) No 575/2013            |                              |
| 15   | Agent transaction exposures  |                              |
| EU-15a   | (Exempted CCP leg of client-cleared SFT exposure)  |                              |
| 16   | Total securities financing transaction exposures (sum of lines 12 to 15a)  |                              |
| <b>Other off-balance sheet exposures</b>   |  |                              |
| 17   | Off-balance sheet exposures at gross notional amount   | 152,387,379                  |
| 18   | (Adjustments for conversion to credit equivalent amounts)  | (74,184,301)                 |
| 19   | Other off-balance sheet exposures (sum of lines 17 to 18)  | 78,203,078                   |
| <b>Exempted exposures in accordance with CRR Article 429 (7) and (14) (on and off balance sheet)</b> |  |                              |
| EU-19a   | (Exemption of intragroup exposures (solo basis) in accordance with Article 429(7) of Regulation (EU) No 575/2013 (on and off balance sheet)) |                              |
| EU-19b   | (Exposures exempted in accordance with Article 429 (14) of Regulation (EU) No 575/2013 (on and off balance sheet))                           |                              |
| <b>Capital and total exposures</b>   |  |                              |
| 20   | Tier 1 capital   | 298,925,720                  |
| 21   | Total leverage ratio exposures (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)   | 1,582,817,521                |
| <b>Leverage ratio</b>  |  |                              |
| 22   | Leverage ratio   | 18.89%                       |
| <b>Choice on transitional arrangements and amount of derecognised fiduciary items</b>                |  |                              |
| EU-23  | Choice on transitional arrangements for the definition of the capital measure  |                              |
| EU-24  | Amount of derecognised fiduciary items in accordance with Article 429(11) of Regulation (EU) NO 575/2013                                     |                              |



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

|       |   | CRR leverage ratio exposures |
|-------|---|------------------------------|
| EU-1  | Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:     | 1,512,493,006                |
| EU-2  | Trading book exposures  |                              |
| EU-3  | Banking book exposures, of which:   | 1,512,493,006                |
| EU-4  | Covered bonds   |                              |
| EU-5  | Exposures treated as sovereigns   | 174,748,300                  |
| EU-6  | Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns | 274,340                      |
| EU-7  | Institutions  | 78,566,062                   |
| EU-8  | Secured by mortgages of immovable properties  |                              |
| EU-9  | Retail exposures  |                              |
| EU-10 | Corporate   | 972,723,649                  |
| EU-11 | Exposures in default  | 26,512,295                   |
| EU-12 | Other exposures (eg equity, securitisations, and other non-credit obligation assets)                  | 175,543,149                  |

## Appendix 7 – Liquidity Coverage Ratio

| Scope of consolidation: Consolidated                      |   | Total unweighted value (average) |            |            |            | Total weighted value (average) |            |            |            |
|---|---|----------------------------------|------------|------------|------------|--------------------------------|------------|------------|------------|
| Currency and units: EURO actual                           |   |                                  |            |            |            |                                |            |            |            |
| Quarter ending on:  |   | 31-Mar                           | 30-Jun     | 30-Sep     | 31-Dec     | 31-Mar                         | 30-Jun     | 30-Sep     | 31-Dec     |
| Number of data points used in the calculation of averages |   | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| <b>HIGH-QUALITY LIQUID ASSETS</b>                         |   |                                  |            |            |            |                                |            |            |            |
| 1   | Total high-quality liquid assets (HQLA)   |                                  |            |            |            | 39,783,547                     | 39,943,206 | 39,579,753 | 38,913,137 |
| <b>CASH-OUTFLOWS</b>                                      |   |                                  |            |            |            |                                |            |            |            |
| 2   | Retail deposits and deposits from small business customers, of which:                           | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 3   | <i>Stable deposits</i>  | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 4   | <i>Less stable deposits</i>   | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 5   | Unsecured wholesale funding   | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 6   | <i>Operational deposits ( all counterparties) and deposits in networks of cooperative banks</i> | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 7   | <i>Non-operational deposits (all counterparties)</i>  | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 8   | <i>Unsecured debt</i>   | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 9   | Secured wholesale funding   |                                  |            |            |            | 0                              | 0          | 0          | 0          |
| 10  | Additional requirements   | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 11  | <i>Outflows related to derivative exposures and other collateral requirements</i>               | 266,594                          | 993,087    | 499,149    | 418,084    | 266,594                        | 993,087    | 499,149    | 418,084    |
| 12  | <i>Outflows related to loss of funding on debt products</i>                                     | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 13  | <i>Credit and liquidity facilities</i>  | 0                                | 0          | 0          | 0          | 0                              | 0          | 0          | 0          |
| 14  | Other contractual funding obligations   | 35,798,594                       | 27,467,778 | 38,456,258 | 50,548,771 | 30,319,105                     | 23,114,016 | 32,140,660 | 46,819,919 |
| 15  | Other contingent funding obligations  | 1,762,105                        | 1,809,121  | 1,962,467  | 2,080,315  | 1,762,105                      | 1,809,121  | 1,962,467  | 2,080,315  |

| 16                                   | TOTAL CASH OUTFLOWS   |                                  |             |            |             | 32,347,804                     | 25,916,224 | 34,602,276 | 49,318,318 |
|--------------------------------------|---|----------------------------------|-------------|------------|-------------|--------------------------------|------------|------------|------------|
| Scope of consolidation: Consolidated |   | Total unweighted value (average) |             |            |             | Total weighted value (average) |            |            |            |
| Currency and units: EURO actual      |   |                                  |             |            |             |                                |            |            |            |
| Quarter ending on:                   |   | 31-Mar                           | 30-Jun      | 30-Sep     | 31-Dec      | 31-Mar                         | 30-Jun     | 30-Sep     | 31-Dec     |
| <b>CASH-INFLOWS</b>                  |   |                                  |             |            |             |                                |            |            |            |
| 17                                   | Secured lending (eg reverse repos)  | 0                                | 0           | 0          | 0           | 0                              | 0          | 0          | 0          |
| 18                                   | Inflows from fully performing exposures   | 65,194,435                       | 81,778,650  | 61,381,608 | 104,372,116 | 23,520,848                     | 29,346,273 | 23,971,388 | 36,192,717 |
| 19                                   | Other cash inflows  | 21,762,086                       | 54,405,286  | 11,037,123 | 11,412,254  | 21,762,086                     | 54,405,286 | 11,037,123 | 11,412,254 |
| EU-19a                               | (Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies) |                                  |             |            |             |                                |            |            |            |
| EU-19b                               | (Excess inflows from a related specialised credit institution)  |                                  |             |            |             |                                |            |            |            |
| 20                                   | <b>TOTAL CASH INFLOWS</b>   | 86,956,521                       | 136,183,936 | 72,418,731 | 115,784,370 | 45,282,934                     | 83,751,559 | 35,008,511 | 46,604,971 |
| EU-20a                               | <i>Fully exempt inflows</i>   |                                  |             |            |             |                                |            |            |            |
| EU-20b                               | <i>Inflows Subject to 90% Cap</i>   |                                  |             |            |             |                                |            |            |            |
| EU-20c                               | <i>Inflows Subject to 75% Cap</i>   | 86,956,521                       | 136,183,936 | 72,418,731 | 115,784,370 | 45,282,934                     | 83,751,559 | 35,008,511 | 47,604,971 |
|                                      |   |                                  |             |            |             | TOTAL ADJUSTED VALUE           |            |            |            |
| 21                                   | <b>LIQUIDITY BUFFER</b>   |                                  |             |            |             | 39,783,547                     | 39,943,206 | 39,579,753 | 38,913,137 |
| 22                                   | <b>TOTAL NET CASH OUTFLOWS</b>  |                                  |             |            |             | 8,086,951                      | 6,479,056  | 8,650,569  | 12,329,580 |
| 23                                   | <b>LIQUIDITY COVERAGE RATIO</b>   |                                  |             |            |             | 491.95%                        | 616.50%    | 457.54%    | 315.61%    |

## Appendix 8 – Asset Encumbrance Disclosure

### Template A - Encumbered and unencumbered assets

|            |  | Carrying amount of encumbered assets |   | Fair value of encumbered assets |   | Carrying amount of unencumbered assets |                             | Fair value of unencumbered assets |                             |
|------------|--|--------------------------------------|---|---------------------------------|---|--|-----------------------------|-----------------------------------|-----------------------------|
|            |  | 010                                  | of which notionally eligible EHQLA and HQLA 030 | 040                             | of which notionally eligible EHQLA and HQLA 050 | 060                                    | of which EHQLA and HQLA 080 | 090                               | of which EHQLA and HQLA 100 |
| <b>010</b> | <b>Assets of the reporting institution</b>     | 730,947,822                          |   |                                 |   | 770,379,217                            | 39,973,580                  |                                   |                             |
| 030        | Equity instruments                             |                                      |   |                                 |   | 131,291,169                            | 39,973,580                  |                                   |                             |
| 040        | Debt securities                                |                                      |   |                                 |   |  |                             |                                   |                             |
| 050        | of which: covered bonds                        |                                      |   |                                 |   |  |                             |                                   |                             |
| 060        | of which: asset-backed securities              |                                      |   |                                 |   |  |                             |                                   |                             |
| 070        | of which: issued by general governments        |                                      |   |                                 |   |  |                             |                                   |                             |
| 080        | of which: issued by financial corporations     |                                      |   |                                 |   |  |                             |                                   |                             |
| 090        | of which: issued by non-financial corporations |                                      |   |                                 |   |  |                             |                                   |                             |
| 100        | Loans and advances other than loans on demand  | 679,757,860                          |   |                                 |   | 529,721,337                            |                             |                                   |                             |
| 120        | Other assets                                   | 51,189,962                           |   |                                 | -   | 109,366,711                            |                             | -                                 | -                           |

Template B-Collateral received

|            |   | Fair value of encumbered collateral received or own debt securities issued |     | Unencumbered  |     |
|------------|---|--|-----|---|-----|
|            |   | of which notionally eligible EHQLA and HQLA                                |     | Fair value of collateral received or own debt securities issued available for encumbrance |     |
|            |   | 010  | 030 | 040   | 060 |
| <b>130</b> | <b>Collateral received by the reporting institution</b>                                   |  |     |   |     |
| 140        | Loans on demand   |  |     |   |     |
| 150        | Equity instruments  |  |     |   |     |
| 160        | Debt securities   |  |     |   |     |
| 170        | of which: covered bonds   |  |     |   |     |
| 180        | of which: asset-backed securities   |  |     |   |     |
| 190        | of which: issued by general governments   |  |     |   |     |
| 200        | of which: issued by financial corporations  |  |     |   |     |
| 210        | of which: issued by non-financial corporations  |  |     |   |     |
| 220        | Loans and advances other than loans on demand   |  |     |   |     |
| 230        | Other collateral received   |  |     |   |     |
| 231        | of which:   |  |     |   |     |
| <b>240</b> | <b>Own debt securities issued other than own covered bonds or asset-backed securities</b> |  |     |   |     |
| <b>241</b> | <b>Own covered bonds and asset-backed securities issued and not yet pledged</b>           |  |     |   |     |
| <b>250</b> | <b>TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED</b>                   | 730,947,822  |     |   |     |

### Template C-Sources of encumbrance

|            |  | Matching liabilities, contingent liabilities or securities lent | Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered |
|------------|--|---|---|
|            |  | 010   | 030   |
| <b>010</b> | <b>Carrying amount of selected financial liabilities</b>   |   |   |
| 020        | Derivatives  |   |   |
| 030        | of which: Over-The-Counter                                 |   |   |
| 040        | Deposits   |   |   |
| 050        | Repurchase agreements                                      |   |   |
| 060        | of which: central banks                                    |   |   |
| 070        | Collateralised deposits other than repurchase agreements   |   |   |
| 080        | of which: central banks                                    |   |   |
| 090        | Debt securities issued                                     |   |   |
| 100        | of which: covered bonds issued                             |   |   |
| 110        | of which: asset-backed securities issued                   |   |   |
| <b>120</b> | <b>Other sources of encumbrance</b>                        | 593,668,697   | 730,947,822   |
| 130        | Nominal of loan commitments received                       |   |   |
| 140        | Nominal of financial guarantees received                   |   |   |
| 150        | Fair value of securities borrowed with non cash-collateral |   |   |
| 160        | Other  | 593,668,697   | 730,947,822   |
| <b>170</b> | <b>TOTAL SOURCES OF ENCUMBRANCE</b>                        | 593,668,697   | 730,947,822   |

## Appendix 9 – Accounting & Regulatory consolidation

### Template 1: EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories

|                                    | a   | b   | c                                    | d                            | e                                       | f                                    | g  |
|------------------------------------|---|---|--------------------------------------|------------------------------|---|--------------------------------------|--|
|                                    | Carrying values as reported in published financial statements | Carrying values under scope of regulatory consolidation | Carrying Values of items             |                              |   |                                      |  |
|                                    |   |   | Subject to the credit risk framework | Subject to the CCR framework | Subject to the securitisation framework | Subject to the market risk framework | Not subject to capital requirements or subject to deduction from capital |
| <b>Assets</b>                      |   |   |                                      |                              |   |                                      |  |
| Cash and balances at central banks | 39,973,580  | 39,973,580  | 39,973,580                           |                              |   | 39,973,580                           |  |
| Loans and advances to banks        | 110,342,196   | 110,342,196   | 110,342,196                          |                              |   | 110,342,196                          |  |
| Loans and advances to customers    | 1,190,773,554   | 1,190,773,554   | 1,190,773,554                        |                              |   | 1,190,773,554                        |  |
| Derivative financial instruments   | 10,999,620  | 10,999,620  |                                      | 10,999,620                   |   | 10,999,620                           |  |
| Intangible Assets and Goodwill     | 23,837,042  | 23,837,042  |                                      |                              |   | 23,837,042                           | 23,837,042   |
| Property, Plant & Equipment        | 3,346,623   | 3,346,623   | 3,346,623                            |                              |   | 3,346,623                            |  |
| Deferred Income Tax Assets         | 9,631,112   | 9,631,112   |                                      |                              |   | 9,631,112                            | 9,631,112  |
| Current Tax Assets                 | 570,783   | 570,783   | 570,783                              |                              |   | 570,783                              |  |
| Other Assets                       | 112,900,565   | 112,900,565   | 112,900,565                          |                              |   | 112,900,565                          |  |
| <b>Total assets</b>                | 1,502,375,075   | 1,502,375,075   | 1,457,907,301                        | 10,999,620                   |   | 1,502,375,075                        | 33,468,154   |
| <b>Liabilities</b>                 |   |   |                                      |                              |   |                                      |  |
| Deposits from banks                | 760,828,084   |   |                                      |                              |   |                                      | 760,828,084  |
| Other Liabilities                  | 183,562,516   |   |                                      |                              |   |                                      | 183,562,516  |
| Derivative financial instruments   | 1,930,106   |   |                                      |                              |   |                                      | 1,930,106  |
| Amounts due to fellow subsidiaries | 164,935,796   |   |                                      |                              |   |                                      | 164,935,796  |
| Subordinated Liabilities           | 65,065,387  |   |                                      |                              |   |                                      | 65,065,387   |
| <b>Total liabilities</b>           | 1,176,321,889   |   |                                      |                              |   |                                      | 1,176,321,889  |

**Template 2: EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements**

|  | a             | b                     | c             | d                        | e                     |
|--|---------------|-----------------------|---------------|--------------------------|-----------------------|
|  | Total         | Items subject to      |               |                          |                       |
|  |               | Credit risk framework | CCR Framework | Securitisation framework | Market risk framework |
| <b>Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)</b> | 1,502,375,075 |                       |               |                          |                       |
| Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)   | 1,176,321,889 |                       |               |                          |                       |
| Total net amount under the regulatory scope of consolidation   | 1,531,852,015 | 1,520,852,395         | 10,999,620    |                          | 1,531,852,015         |
| Off-balance-sheet amounts  | 152,387,379   | 152,387,379           |               |                          |                       |
| <i>Differences in valuations</i>   | 8,209,059     |                       | 8,209,059     |                          | 8,209,059             |
| <b>Exposure amounts considered for regulatory purposes</b>   | 1,692,448,453 | 1,673,239,774         | 19,208,679    |                          | 1,540,061,074         |



**Template 3: EU LI3 – Outline of the differences between in the scopes of consolidation (entity by entity)**

|   | a                                  | b                                  | c                          | d                                 | e        | f                         |
|---|------------------------------------|------------------------------------|----------------------------|-----------------------------------|----------|---------------------------|
| Name of the entity  | Method of accounting consolidation | Method of regulatory consolidation |                            |                                   |          | Description of the entity |
|   |                                    | Full consolidation                 | Proportional consolidation | Neither consolidated nor deducted | Deducted |                           |
| Dell Bank International d.a.c.                                      | Full consolidation                 | X                                  |                            |                                   |          | Credit institution        |
| Dell Receivables Financing 2016 Designated Activity Company (d.a.c) | Full consolidation                 | X                                  |                            |                                   |          | SPV                       |
| Dell Bank International d.a.c Sucursal en Espana                    | Full consolidation                 | X                                  |                            |                                   |          | Branch                    |
| DFS BV  | Neither consolidated nor deducted  |                                    |                            | X                                 |          | Hold Co                   |

## Appendix 10 – Risk-Weighted exposures

### Template 4: EU OV1 - Overview of RWAs

|   |    |  | RWAs          |               | Minimum capital requirements |
|---|----|--|---------------|---------------|------------------------------|
|   |    |  | T             | T-1           | T                            |
|   | 1  | Credit risk (excluding CCR)  | 1,323,262,917 | 890,734,414   | 105,861,033                  |
| Article 438(c)(d)                               | 2  | Of which the standardised approach   | 1,323,262,917 | 890,734,414   | 105,861,033                  |
| Article 438(c)(d)                               | 3  | Of which the foundation IRB (FIRB) approach                                  |               |               |                              |
| Article 438(c)(d)                               | 4  | Of which the advanced IRB (AIRB) approach                                    |               |               |                              |
| Article 438(d)                                  | 5  | Of which equity IRB under the simple risk-weighted approach or the IMA       |               |               |                              |
| Article 107                                     | 6  | CCR  | 8,550,424     | 7,280,737     | 684,034                      |
| Article 438(c)(d)                               |    |  |               |               |                              |
| Article 438(c)(d)                               | 7  | Of which mark to market  | 8,550,424     | 7,280,737     | 684,034                      |
| Article 438(c)(d)                               | 8  | Of which original exposure   |               |               |                              |
|   | 9  | Of which the standardised approach   |               |               |                              |
|   | 10 | Of which internal model method (IMM)   |               |               |                              |
| Article 438(c)(d)                               | 11 | Of which risk exposure amount for contributions to the default fund of a CCP |               |               |                              |
| Article 438(c)(d)                               | 12 | Of which CVA   | 6,462,966     | 3,673,197     | 517,037                      |
| Article 438(e)                                  | 13 | Settlement risk  |               |               |                              |
| Article 449(o)(i)                               | 14 | Securitisation exposures in the banking book (after the cap)                 |               |               |                              |
|   | 15 | Of which IRB approach  |               |               |                              |
|   | 16 | Of which IRB supervisory formula approach (SFA)                              |               |               |                              |
|   | 17 | Of which internal assessment approach (IAA)                                  |               |               |                              |
|   | 18 | Of which standardised approach   |               |               |                              |
| Article 438 (e)                                 | 19 | Market risk  | 3,946,238     | 1,986,394     | 315,699                      |
|   | 20 | Of which the standardised approach   | 3,946,238     | 1,986,394     | 315,699                      |
|   | 21 | Of which IMA   |               |               |                              |
| Article 438(e)                                  | 22 | Large exposures  |               |               |                              |
| Article 438(f)                                  | 23 | Operational risk   | 129,645,784   | 112,057,744   | 10,371,663                   |
|   | 24 | Of which basic indicator approach  | 129,645,784   | 112,057,744   | 10,371,663                   |
|   | 25 | Of which standardised approach   |               |               |                              |
|   | 26 | Of which advanced measurement approach                                       |               |               |                              |
| Article 437(2),<br>Article 48 and<br>Article 60 | 27 | Amounts below the thresholds for deduction (subject to 250% risk weight)     |               |               |                              |
| Article 500                                     | 28 | Floor adjustment   |               |               |                              |
|   | 29 | Total  | 1,471,868,329 | 1,015,732,485 | 117,749,466                  |

### Template 19: EU CR4 – Standardised Approach - Credit Risk Exposure and CRM effects

|    | Exposure classes  | a                            | b                        | c                          | d                        | e                    | f           |
|----|---|------------------------------|--------------------------|----------------------------|--------------------------|----------------------|-------------|
|    |   | Exposures before CCF and CRM |                          | Exposures post CCF and CRM |                          | RWAs and RWA density |             |
|    |   | On-balance-sheet amount      | Off-balance-sheet amount | On-balance-sheet amount    | Off-balance-sheet amount | RWAs                 | RWA density |
| 1  | Central governments or central banks                            | 174,748,300                  | 988,146                  | 174,748,300                | 988,146                  | 83,654               | 0.05%       |
| 2  | Regional government or local authorities                        | 274,340                      |                          | 274,340                    |                          | 54,868               | 20.00%      |
| 3  | Public sector entities  |                              |                          |                            |                          |                      |             |
| 4  | Multilateral development banks                                  |                              |                          |                            |                          |                      |             |
| 5  | International organisations                                     |                              |                          |                            |                          |                      |             |
| 6  | Institutions  | 162,691,273                  | 4,047,334                | 162,691,273                | 2,728,748                | 81,294,810           | 49.14%      |
| 7  | Corporates  | 972,723,649                  | 147,351,898              | 972,723,649                | 74,486,184               | 1,022,998,179        | 97.69%      |
| 8  | Retail  |                              |                          |                            |                          |                      |             |
| 9  | Secured by mortgages on immovable property                      |                              |                          |                            |                          |                      |             |
| 10 | Exposures in default  | 26,512,295                   |                          | 26,512,295                 |                          | 39,757,617           | 149.96%     |
| 11 | Exposures associated with particularly high risk                |                              |                          |                            |                          |                      |             |
| 12 | Covered bonds   |                              |                          |                            |                          |                      |             |
| 13 | Institutions and corporates with a short-term credit assessment |                              |                          |                            |                          |                      |             |
| 14 | Collective investment undertakings                              |                              |                          |                            |                          |                      |             |
| 15 | Equity  |                              |                          |                            |                          |                      |             |
| 16 | Other items   | 175,543,149                  |                          | 175,543,149                |                          | 179,073,789          | 102.01%     |
| 17 | <b>Total</b>  | 1,512,493,006                | 152,387,378              | 1,512,493,006              | 78,203,078               | 1,323,262,917        | 83.19%      |