Basel III Pillar 3 Report

Market discipline



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1. OBJECTIVE AND SCOPE OF THIS REPORT

The objective of this report is to provide in-depth information on risk management at BCV Group to investors, analysts, ratings agencies and supervisory bodies. In particular, it describes the Bank's capital adequacy, its risk-assessment methods and the level of risk taken at BCV. This document was prepared in accordance with the Pillar 3 disclosure requirements set forth under the Basel III Accord, together with Circular 2016/1 "Disclosure – banks" published by the Swiss Financial Market Supervisory Authority (FINMA).

1.1 Disclosure policy

For ease of access, this report is available in the investor relations section of BCV's website. It has been updated on a half-yearly basis ever since BCV became subject to Basel II on 1 January 2009. It is published within two months following the end of the first half of the financial year and within four months following the end of the financial year, in accordance with Swiss regulations (FINMA Circular 2016/1, margin number 40).

This version of the report corresponds to the closing of accounts on 31 December 2018.² The description of the Bank's governance, methods, and processes reflects the situation at 31 December 2018; subsequent changes are not included.

The Bank's external auditor verifies, as a general rule every three years, compliance with financial disclosure requirements based on FINMA Circular 2013/3 "Auditing," and states its opinion in its detailed audit report. The data contained in the Bank's Pillar 3 reports are calculated in accordance with the Basel III Accord regulatory capital requirements. This calculation process was audited during FINMA's IRB approval process and is subject to oversight as part of the regulatory supervision process. Furthermore, BCV's Internal Audit Department periodically reviews the process for calculating capital requirements (Basel III Accord, §443).

The appendix to this report contains information that is useful for understanding this document, including a description of business segments and a list of abbreviations.

The figures contained in the tables have each been properly rounded depending on the number of significant digits used for the table; this may result in discrepancies between listed column and row totals and the sum of individual column or row items.

1.2 Scope

The parent company within BCV Group is Banque Cantonale Vaudoise, a corporation organized under public law with its headquarters in Lausanne. The parent company has a branch in Guernsey.

The companies that the Group is required to include in its regulatory reporting include companies over which BCV has control and companies in which it has significant influence over operations. These companies are fully consolidated. Significant influence is generally recognized by the Bank when it makes a profit from or bears the risks of a company's operations.

Companies in which BCV has significant influence but no outright control (holdings of 20%–50%) are accounted for using the equity method.

The following companies are not included in the scope of consolidation:

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¹The correspondence between the tables in this Pillar 3 report and those in the Basel Accord is given in the Appendix (Section 7.3.1).

²End-June figures are taken from BCV's interim financial statements, which are not audited by an independent auditor.

- Holdings of no material significance in terms of financial reporting and risk;
- Significant holdings not held for strategic purposes and intended to be sold or liquidated within 12 months.

Table 1. Group companies included in the regulatory scope of consolidation At 31 December 2018, BCV Group

Group companies included in the supervisory review in millions		Shareholding (%)	
Private banks			
Piguet Galland & Cie SA, Yverdon-les-Bains (Switzerland)	CHF	24.4	99.7
Fund-management companies Gérifonds SA, Lausanne (Switzerland) Gérifonds (Luxembourg) SA, Luxembourg Société pour la gestion de placements collectifs GEP SA, Lausanne (Switzerland)	CHF EUR CHF	2.9 0.1 1.5	100.0 100.0 100.0

The regulatory scope of consolidation did not change in 2018.

Companies taken into account for calculating capital requirements are the same as those included in the Group's consolidated accounts. All these companies are fully consolidated in the financial statements. No company is currently accounted for using the equity method. The Group has no subsidiaries in the field of insurance.

There are no restrictions that could hinder the transfer of money or capital within the Group.

2. CAPITAL ADEQUACY AND LIQUIDITY

Monitoring capital adequacy and liquidity is a key component of BCV's financial strategy. Management carefully considers the potential impact on the Bank's capital and liquidity ratios before making any major decisions about the Bank's operations and the orientation of its business.

The Executive Board monitors the capital and liquidity ratios monthly for the parent company. Both the Executive Board and the Board of Directors monitor these ratios every quarter for the parent company and every six months for the Group as a whole. FINMA monitors the parent company's capital adequacy and liquidity each quarter and the Group's capital adequacy and liquidity every six months using regulatory-required reports.

2.1 Key ratios

FINMA's capital ratio requirement³ is based on the Basel III Accord and is set forth in Article 41 of the Capital Adequacy Ordinance (CAO). The minimum required total capital ratio for BCV was 13.8% at 31 December 2018. It comprises the permanent requirement for a category 3 bank (12%), a countercyclical buffer (0.8%), and an additional capital requirement (1%). The permanent requirement consists of the absolute minimum requirement for a banking license (8%) and the capital buffer for a category 3 bank (4.0%). The countercyclical buffer is a temporary requirement set by the Swiss Federal Council upon the recommendation of the Swiss National Bank. The additional capital requirement is a temporary requirement set by FINMA in light of the extremely low interest rates. Given those low rates, and BCV's interest-rate-risk exposure as determined by FINMA, FINMA has set an additional capital requirement of 1% for BCV.

BCV Group's total capital ratio was 17.2% at 31 December 2018, higher than the regulatory requirement of 13.8%. The Bank's Common Equity Tier 1 (CET1) ratio was 17.1%, also above FINMA's requirement of 9.6%. The difference between the Bank's total capital ratio and CET1 ratio is due to the fact that its Tier 2 capital comprises reserves on debt and equity securities carried under financial investments and stated at lower of cost or market, subject to a limit of 45% of unrealized gains.

The leverage ratio⁴ was 6.2% at 31 December 2018 (see tables in Section 7.2). This ratio is above the regulatory requirement of 3% effective as of 1 January 2018.

BCV Group's liquidity coverage ratio (LCR) was an average of 112% in the second half of 2018, above the minimum regulatory requirement of 90% for 2018 (see Section 5.4).

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³The capital ratio is equal to regulatory capital divided by risk-weighted assets.

⁴The leverage ratio is equal to Tier 1 capital divided by the total exposure measure.

Table 2. Key metrics

In CHF millions, BCV Group, (KM1)⁵

		а	С	е
		31/12/2018	30/6/2018	31/12/2017
Avail	able capital			
1	Common Equity Tier 1 (CET1)	3,156	3,109	3,118
2	Tier 1 (T1)	3,156	3,109	3,118
3	Total capital	3,177	3,132	3,140
Risk-	weighted assets (RWA)			
4	Total RWA	18,423	18,949	18,199
4a	Minimum capital requirement	1,474	1,516	1,456
Risk-	based capital ratios as % of RWA			
5	CET1 ratio	17.1%	16.4%	17.1%
6	Tier 1 ratio	17.1%	16.4%	17.1%
7	Total capital ratio	17.2%	16.5%	17.3%
FINM	A capital ratio requirements			
	Minimum total capital ratio (CAO, Art. 42)	8.0%	8.0%	8.0%
	Total capital buffer (CAO, Annex 8)	4.0%	4.0%	4.0%
	Countercyclical buffer (CAO, Art. 44 and 44a)	0.8%	0.7%	0.7%
12e	Total regulatory capital requirement in accordance with Annex 8 of the CAO plus the countercyclical buffer (CAO, Art. 44 and 44a)	12.8%	12.7%	12.7%
	Additional capital requirement* (CAO, Art. 45)	1.0%	1.0%	1.0%
	Total FINMA capital requirement	13.8%	13.7%	13.7%
Base	I III leverage ratio			
13	Total Basel III leverage ratio exposure measure	50,651	48,296	47,886
	Basel III leverage ratio (Tier 1 capital as % of total Basel III leverage ratio exposure measure)	6.2%	6.4%	6.5%
Liqui	dity coverage ratio (LCR)			
15	Total high-quality liquid assets (HQLA)	8,515	8,721	8,614
16	Total net cash outflow	7,581	7,471	7,370
17	LCR	112%	117%	117%

*FINMA has set a temporary additional capital requirement of 1% for BCV, given the extremely low interest-rate environment and BCV's interest-rate-risk exposure as determined by FINMA.

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⁵This table is a summary version of the Table KM1 required by FINMA. Only the FINMA capital ratio requirements are shown in this table; the Basel Committee requirements are less stringent and have not been included to avoid confusion. The full Table KM1 is provided in the Appendix (Table 28). The LCR figures represent the average for the six months preceding the indicated date.

2.2 Capital structure

BCV Group's regulatory capital is composed almost entirely of CET1 capital, with a marginal amount of T2 capital. Regulatory capital is based on the Group's financial statements, which are drawn up in accordance with the Swiss accounting rules for banks of 27 March 2014 (FINMA Circular 2015/1).

CET1 capital comprises paid-in capital, disclosed reserves, and minority interests. At 31 December 2018, BCV's share capital amounted to CHF 86,061,900 and consisted of 8,606,190 fully paid-in registered shares with a par value of CHF 10. CET1 capital is adjusted for regulatory deductions such as goodwill and any shortfall of provisions to regulatory expected losses. BCV has not issued any capital instruments that meet the criteria for inclusion in Additional Tier 1 (AT1) capital. In particular, BCV has no authorized or conditional capital and has not issued any dividend-right certificates. There are no outstanding convertible bonds or options issued by the Bank involving the BCV share.

T2 capital comprises reserves on debt and equity securities carried under financial investments and stated at lower of cost or market, subject to a limit of 45% of unrealized gains, and general provisions allocated under the International Standardized Approach. BCV has not issued any capital instruments that meet the criteria for inclusion in T2.

Table 3. Composition of regulatory capital

In CHF millions, BCV Group, (CC1)6

		а	a-1	b
		Net figu	ıres	References
		31/12/2018	30/6/2018	
Cor	mmon Equity Tier 1 (CET1)			
1	Issued and paid-in capital, fully eligible	86	86	С
2	Retained earnings, including reserves for general	3,120	3,072	
	banking risks and net profit (loss) for the period			
3	Capital reserve and currency translation reserve (+/-)	34	34	
5	Minority interests	0	0	
6	CET1 before regulatory adjustments	3,240	3,192	
CET	Γ1 regulatory adjustments			
8	Goodwill (net of related tax liability)	9	11	а
12	IRB shortfall of provisions to expected losses	56	53	
16	Net long position in own CET1 instruments	20	19	
28	Total regulatory adjustments to CET1	85	83	
29	Net CET1	3,156	3,109	
Add	litional Tier 1 capital (AT1)			
36	AT1 before regulatory adjustments	-	-	
43	Total regulatory adjustments to AT1	-	-	
44	Net AT1	-	-	
45	Net Tier 1 capital	3,156	3,109	
Tier	^r 2 capital (T2)			
46	Issued and paid-in instruments, fully eligible	-	-	
48	Minority interests eligible as T2	-	-	
50	Valuation adjustments; provisions and	22	23	
	impairments for prudential reasons; compulsory			
	reserves on financial investments			
51	T2 before regulatory adjustments	22	23	
	regulatory adjustments			
52	Net long position in own T2 instruments	-	-	
57	Total regulatory adjustments to T2	•	-	
58	Net T2	22	23	
59	Total regulatory capital (Net T1 & Net T2)	3,177	3,132	

The increase in regulatory capital reflects the inclusion of the Bank's net profit for 2018 after subtracting out the dividend payout (subject to approval at the Shareholders' Meeting).

⁶Net profit for the current fiscal year is not included in regulatory capital at 30 June (Row 2). This table is a summary version of Table CC1, which is provided in full in the Appendix (Table 30).

2.3 Risk-weighted assets

Credit risk accounts for over 80% of the Bank's total risk exposure, in keeping with its business model and risk-taking strategy.

Table 4. Overview of RWA In CHF millions, BCV Group, (OV1)⁷

		а	b	С
				Minimum capital
		RW	4	requirements
		31/12/2018	30/6/2018	31/12/2018
1	Credit risk (excluding counterparty credit risk)	15,446	15,723	1,236
2	Of which: standardized approach (SA)	1,570	3,225	126
3	Of which: internal ratings-based approach (F-IRB)	7,559	6,338	605
4	Of which: supervisory slotting approach	5,736	5,572	459
	Of which: assets without a counterparty	580	588	46
6	Counterparty credit risk (CCR)	264	418	21
7b	Of which: market-based approach	153	190	12
9	Of which: other CCR approach	31	51	3
10	Of which: credit valuation adjustment (CVA)	80	177	6
11	Equity positions in banking book under market-based approach	132	134	11
13	Equity investments in funds – mandate- based approach	0	0	0
14	Equity investments in funds – fall-back approach	27	22	2
14a	Equity investments in funds – simplified approach	44	44	4
15	Settlement risk	-	-	-
20	Market risk	178	257	14
21	Of which: Standardized Approach	178	257	14
24	Operational risk	1,755	1,772	140
25	Amounts below the thresholds for deduction (250% risk weighting)	579	579	46
26	Floor adjustment	-	-	-
27	Total	18,423	18,949	1,474
	-			

The decline in risk-weighted assets in H2 2018 was mainly due to the fact that the Bank obtained IRB approval from FINMA to use its internal rating model for large corporate counterparties. As of 31 December 2018, exposures to these counterparties have been determined using the F-IRB approach; prior to that date, the International Standardized Approach (SA-BIS) was used.

Since end-2017, BCV has been using the new regulatory approaches for its holdings in investment funds (as set forth in Article 63.3(f^{bis}) of the CAO and in margin number 333 of FINMA Circular 2017/7). The mandate-based approach is used for holdings in real-estate funds; the simplified approach is used for holdings in non-real-estate funds with a synthetic risk indicator of between 1 and 4; the fall-back approach is used for holdings in all other funds.

⁷An additional row has been added under "Credit risk" to indicate non-counterparty-related assets, which consist primarily of real estate and other tangible assets.

3. COMPREHENSIVE RISK MANAGEMENT APPROACH

The framework for risk governance, risk exposure (risk appetite), risk-assessment principles, and risk reporting, as well as other operational guidelines relating to risk management, are defined in the Bank's Risk Management Policy and Strategy (RMPS). The RMPS is the institution-wide risk management framework. It is an internal framework document that is reviewed and approved each year by the Board of Directors.

This section of the report sets out the Bank's risk-management principles, as required by FINMA for Pillar 3 disclosure.

3.1 Risk management objectives and governance

Risk-management objectives

BCV manages all its risks in an integrated and consistent way, using a process that encompasses all of the Bank's activities. The overall goals are to ensure that:

- BCV's risk exposure is evaluated, monitored, and reported in a manner that is appropriate to the economic and regulatory environment;
- BCV's risk-taking capacity is in line with its risk profile;
- BCV earns optimal returns on the risks that it takes and hence on the equity capital committed.

Risk-management governance

All risks are managed according to the same basic principles of governance and organization. The main responsibilities can be summarized as follows:

- The Board of Directors establishes the Bank's policy for managing risk and determines the strategy the Bank will pursue in taking on risk;
- The Board of Directors' Audit & Risk Committee ensures that the risk-management policy set by the Board of Directors is implemented and operational;
- The Executive Board is responsible for ensuring that the risk-management procedures are implemented and operational, and for monitoring the Bank's risk profile. The Executive Board monitors strategic and business risk and supervises the Executive Board Risk Management Committee (EBRMC) in monitoring and reporting these risks. The EBRMC is chaired by the Chief Financial Officer (CFO), and includes the CEO, other division heads, and the head of the Risk Management Department;
- Division heads are responsible for conducting and monitoring the activities of their divisions, regardless of whether the division has a front-line, steering, or business-support role. They have initial responsibility for overseeing, identifying, and managing the strategic, business, credit, market, and operational risks arising from the activities of their divisions;
- The CFO also assumes the role of Chief Risk Officer. The CFO puts forward the risk-management
 policy and strategy, monitors the Bank's aggregate risk profile, is responsible for capital adequacy,
 and helps foster a culture of risk management among staff, with the support of the Risk
 Management Department, which reports to the CFO;
- The Chief Credit Officer (CCO) is responsible for analyzing risk for all types of credit-risk exposure assumed by the Bank and, up to the limit of his approval authority (see below), for credit decisions and for monitoring risk exposure on a counterparty basis.

Risk Management Department

The Risk Management Department's mission is: to develop and continually improve the Bank's methods and principles for managing credit, market, and operational risk; to monitor the Bank's risk profile; and to oversee and execute risk reporting. The Department ensures that the Bank's internal control system is properly implemented and in keeping with the Bank's needs; it is also in charge of submitting all risk reports to the Bank's governing bodies. Finally, it is responsible for the overnight monitoring of market risk for BCV's trading floor.

Compliance function

The compliance function makes sure that the Bank operates in accordance with the regulatory requirements that fall within its purview. Its purview includes regulations related to customer relations, anti-money-laundering and terrorist financing, market monitoring, and transparency. Various entities within the Bank are responsible for transposing the other regulatory requirements and banking regulations that fall within their purview into BCV guidelines and directives and for carrying out independent checks to ensure that those guidelines and directives are being applied. The compliance function reports to the Chief Financial Officer (CFO).

Audit function

The remits of the Internal Audit Department and external auditors are set out in their respective audit programs and involve assessing the Bank's functioning and processes, and the methods of levels 1 and 2 of the internal control system.

3.2 Risk-taking strategy

BCV's risk appetite (or acceptable risk profile) is determined in accordance with the Bank's business strategy and capital-management strategy. The risk appetite is set so as to be consistent with the Bank's business model as a full-service bank with strong local roots and focused on moderate-growth activities. Granting loans in Vaud Canton is a core element of the Bank's mission and strategy and one that gives rise to credit risk. Market risk arising from the trading book is intended to remain only a marginal source of risk for the Bank.

The Bank has adopted a risk-taking strategy that spells out its risk-taking principles, overall limits, and target values, in order to keep its risk profile at appropriate levels. For credit and market risk, the Bank's Risk Management Policy and Strategy (RMPS) establishes overall risk-exposure limits for a given portfolio or business line. It also includes risk-concentration limits for exposures to a given counterparty, underlying asset, or other risk-concentration factor.

The Executive Board Risk Management Committee, through the CFO, oversees compliance with the RMPS. Any crossed limits or instances of non-compliance with the principles set out in the RMPS are escalated to the Executive Board, which then reports to the Board of Directors.

3.3 Classification of risks and risk-assessment principles

Classification of risks

The Bank looks at three aspects for all types of risk:

• First, the existence of a risk factor, i.e., a source of uncertainty relative to the Bank's interests (e.g., the uncertain financial situation of one of the Bank's counterparties, or an equity position in the trading book with a fluctuating price);

- Second, the occurrence of a risk event, which is a situation that has an adverse effect on the Bank's interests and that is caused by the deterioration of a risk factor (e.g., if one of the Bank's counterparties does not meet its financial obligations, or if a share price falls);
- Third, the assessment of the negative impact that the risk event would have on the Bank's interests (e.g., the need to record a loan impairment charge or a loss on a security).

Throughout the Bank, four categories of risk are used to classify risk events:

- Strategic and business risk. Strategic risk arises from economic or regulatory changes that have an adverse effect on the Bank's strategic choices; business risk is the result of competitive changes that have an adverse effect on business decisions for a given strategy;
- Credit risk. This arises from the possibility that a counterparty may default. Credit risk exists before and during unwinding of a transaction;
- Market risk. This arises from potential adverse changes in market parameters particularly prices and implied volatility – and other market effects (e.g., correlation between asset prices and market liquidity). Liquidity risk, both in terms of the structural funding of activities and short-term liquidity management, is also deemed to be a component of market risk;
- Operational risk. This arises from a possible inadequacy or failure relating to processes, people
 and/or information systems within and outside the Bank. Operational risk includes the risk of noncompliance; i.e., the risk of the Bank breaching legal requirements, standards, and regulations.

For all risk types, the Bank seeks to protect itself against three types of potential impact:

- The financial impact, that is, a decrease in the Bank's net profit and/or a drop in the book or economic value of the Bank's capital;
- The regulatory impact, that is, inquiries, sanctions, increased monitoring or a restriction on banking activities;
- The reputational impact, that is, the image the Bank projects to the outside world.

Risk assessment

Throughout the Bank's businesses and portfolios and for every position and transaction, the Bank assesses and monitors its risk profile, i.e., its exposure to strategic, business, credit, market, and operational risks. The Bank assesses the potential financial, regulatory, and reputational impact of these risks.

Risk assessment generally involves analyzing the following:

- Risk exposure
 - This involves determining whether the Bank is exposed to certain risks as a result of its activities or operational processes.
- Risk factors and events
 - This involves identifying relevant risk factors and determining potential risk events. For strategic and business risk, this includes all economic and regulatory factors that may affect the Bank's business activities and its operational processes. For credit, market, and operational risk, the relevant risk factors and risk events are defined according to the nature of the Bank's activities.

• The impact of risks

This involves determining the potential financial, regulatory, and reputational impact. For risks with a potential financial impact, this means defining *loss metrics* and *risk metrics* and determining *capital requirements*.

Loss metrics, which are used to determine the potential financial impact, are calculated in accordance with the guidelines set out in the RMPS; they are developed for each risk category set out above. Generally speaking, the Bank uses effective loss, expected loss, and accounting loss to measure loss. Which risk metrics are applied depends on the relevant risk factors and the risk categories in question. These metrics reflect the methods and tools currently available to the Bank. The Bank continually improves and implements the risk metrics to make them more integrated and consistent across the Bank's various activities and risk categories. In terms of capital requirements, the Bank monitors its capital situation in accordance with the FINMA framework.

Risk reports

Risk-related reports are intended to provide an overview of the Bank's risk profile at a given point in time, in order to identify any increases in risk exposure or changes in risk profile. The head of the Risk Management Department has overall responsibility for compiling these reports. If the reports show a material deterioration in the Bank's risk profile, the Department head informs the CFO who then informs the Executive Board, the Chair of the Audit and Risk Committee, the Chairman of the Board of Directors and the Internal Audit Department.

The Bank's Risk Report gives insight into the overall economic climate and trends in the Bank's business and strategic risk, credit risk, market risk, and operational risk. This report also helps assess the financial impact of those risks and determine whether risk exposure is within the limits set by the RMPS.

For credit risk, the Risk Report provides information on the following items in particular: breakdown between banks and non-banks and by industry, segment, and region; impaired vs. non-impaired loans; provisions; expected losses; capital requirements; major risks; counterparties with the largest provisions; a watchlist for each business line; and compliance with limits in the RMPS for specific portfolios and counterparties.

For market risk, the Risk Report provides information on the following items in particular:

- Trading book Value of the trading book; use of funding limits; use of VaR limits; and compliance with limits in the RMPS;
- Interest-rate risk in the banking book Equity duration; the sensitivity of the net interest margin to major stress scenarios; and compliance with limits in the RMPS;
- Liquidity risk Short-term funding structure; total liquidity; concentration risk on short-term deposits; and compliance with limits in the RMPS.

For operational risk, the Risk Report provides information on the following items in particular: provisions and losses resulting from operational risk, the most significant new provisions and losses, and changes in operational-risk events.

Most data in the Risk Report are updated monthly. Every six months a report on the Risk Management Department's operations is included. The Executive Board Risk Management Committee reviews the Risk Report every month; the Executive Board, Audit and Risk Committee, and Board of Directors review it every quarter. Once approved, the quarterly Risk Report is also sent to the head of the Internal Audit Department, the Chief Compliance Officer, and the entity responsible for the Bank's independent audits.

4. CREDIT RISK

4.1 Credit-risk framework

Strategy and processes

Guidelines for taking on credit risk

The Bank's lending activities are focused on Vaud Canton; lending does however take place to a lesser extent in other parts of Switzerland and other countries for specific client segments and products. Through its lending activities, the Bank aims to contribute to the development of all areas of the private-sector economy, to mortgage lending, and to the financing of public-sector entities within the Canton.

Lending at the Bank is based on the principle that a borrower must be able to fully repay any loan within a given period, or that the Bank may be released from any commitments it may have in regard to counterparties, while receiving fair compensation for the risks incurred and the work undertaken.

The Bank applies a differentiated pricing policy according to the estimated degree of risk. Where preferential terms are requested due to the extent of the Bank's business relationship with the counterparty or business group, the overall return on the business relationship is taken into consideration.

The Bank does not engage in pledge financing or name lending. The lending decision takes into account the solvency of the counterparty, the project's earnings capacity, and the management's capabilities; these factors take precedence over collateral value or reputation.

The Bank avoids financing or supporting illegal or immoral activities through its lending facilities. The Bank also avoids facilitating, through its lending facilities, activities that could entail a risk of money laundering, insider trading, corruption, or activities that would breach in any other way the Swiss banks' code of conduct with regard to the exercise of due diligence. The Bank avoids operations that may damage its reputation or image.

Standards and procedures for lending and loan renewals

Before taking on credit risk, the Bank conducts an analysis of the nature and complexity of lending commitments, using the appropriate internal methods for that type of transaction. BCV will not grant, increase, or renew loans to debtors until it has assessed solvency, i.e., until it has determined the appropriate internal counterparty rating of the probability of default using established methods. Risks relating to transactions and the return on commitments are also analyzed. It is in this context that the collateral for the commitment is identified and evaluated.

For both new and existing banking relationships, the Bank studies the economic background, the nature of and the reasons for the transaction, as well as the relationship between the parties involved. The Bank seeks to obtain a detailed view of the economic and personal situation of counterparties, and, as necessary, of the beneficial owners, the guarantors, or the beneficiaries of guarantees. The information obtained is carefully verified.

The Bank develops, reviews, and uses standard criteria for lending decisions. For financing single-family homes and income-producing real estate, these criteria were chosen, in particular, for their reliability and clarity.

Contractual documentation for standard lending operations is drawn up using models and/or guidelines that have been validated by the Bank's Legal Department. For some lending operations, the Bank's legal department or, if necessary, external experts may be called upon. Contractual provisions aim to ensure that the funds are used in accordance with the stated purpose of the lending facility and that the Bank obtains any requested financial information within the stated deadlines. For medium- and long-term lending commitments, the contract is written in such a way as to ensure that the Bank's position as lender is not subordinated to that of other creditors without its agreement, in

terms of both collateral and the counterparty's position within a business group. For long-term commitments that cannot be terminated at any time based on the Bank's General Conditions, or for which the Bank cannot call in additional collateral at any time, the Bank adds a termination clause to hedge against the increased risk.

An application is prepared for all lending decisions. The application clearly states the reasons, conditions and contractual terms associated with the risk taken, and in particular the credit limit granted to the counterparty or business group. These applications are submitted for approval to the competent body according to a defined delegation chain.

Reexamination of lending commitments and collateral

Lending commitments are reviewed to assess any change in the counterparty's solvency or the value of the collateral, and to determine whether the commitments should be maintained at the existing level or reduced. The Bank uses an internal timetable to ensure that a periodic review is conducted of all lending commitments associated with a business group together with the contractual terms. A similar timetable is also used to review the level of collateral.

In addition to these regular reviews, the Bank uses a system of alerts under which specific commitments are reviewed outside of the normal timetable if any deterioration is detected. These alerts could be triggered and a review required, for example, if payment deadlines are missed or if there is a delay in the submission of information required to properly monitor lending commitments.

Decisions made on the basis of these reviews are subject to a delegation chain similar to the one used to assess whether to grant a new line of credit.

Limits, portfolio monitoring, and special measures

Within the credit portfolio, global risk limits are defined, mainly for the purpose of tallying up exposures that taken together could have a major impact on the Bank's net profit and economic capital. These limits are defined and monitored:

- For the nominal exposure, the expected loss and the capital requirement for various client segments and for activities outside Vaud Canton and outside Switzerland.
- For the amount and term of the lending commitments in each foreign country in which the Bank takes on credit risk. The limits are determined through an internal analysis of the financial and settlement risks associated with the financing in place in the various countries.
- For the amount of aggregate positions for a given business group in order to monitor concentration risk

If necessary, in addition to setting and monitoring these limits, the Bank analyzes specific portfolios that are deemed to be exposed to potential or actual adverse conditions. These analyses may lead to proactive measures for a sub-grouping of the counterparties in question in order to enhance credit-risk monitoring.

Furthermore, in case of extraordinary events, such as a significant decline in the local or broader property market, the dates on which collateral is reviewed may be moved forward for groups of collateral identified in accordance with various criteria (by region, property type, age of existing valuation, etc.) to avoid a situation in which the Bank's information systems contain obsolete and overestimated amounts for the market value of properties.

Monitoring and treating counterparties reputed to be in financial difficulty and counterparties in default

Counterparties that present a particularly high risk of default but are nevertheless considered to be performing are said to be "reputed to be in financial difficulty" (RD). These counterparties, along with counterparties that are "in default" (ID), are subject to closer monitoring.

Lending commitments to RD or ID counterparties are treated by the Bank individually, quickly and with the necessary rigor, in accordance with ethical and compliance-related rules. These positions must generally be made sound over the course of three to four years. Where this strategy cannot be applied, the Bank takes the appropriate measures to minimize its losses.

Structure and organization

Responsibilities in the credit process

In processing credit operations, the Bank as a general rule separates its client-facing divisions (Corporate Banking, Retail Banking, Private Banking, and Asset Management & Trading), which are responsible for advising, selling, selecting, pre-analyzing, and pricing the transactions, from the Credit Management Division, whose departments are in charge of the other phases of the lending process, such as analysis, granting loans, arranging the financing, and monitoring credit limits. In addition to the principle of separation, rules exist to avoid potential conflicts of interest between counterparties, on the one hand, and analysts and specialists, on the other.

Delegation chain for credit-related decisions

The decision-making process involves approving or reviewing a position and validating the internal counterparty rating of the probability of default as well as any overrides. To determine the competent body, the Bank applies a differentiated delegation chain that ensures that large and high-risk commitments are dealt with at the highest level, guaranteeing that Management is appropriately involved in taking on credit risk.

The competent body depends on the nature of the commitments and the level of credit risk of the business group to which the counterparty belongs. Decision-making authority is attributed individually or to credit committees, in accordance with a set of approval limits for each type of commitment (e.g., loans and advances to customers, interbank lending, and loans to employees and members of the governing bodies). These limits, which are different for credit decisions and reviews of existing commitments, depend on the internal counterparty rating of the probability of default, the nature, amount and term of the lending commitment, and the level and quality of the collateral for the financing. In addition, should certain lending criteria not be met, any decision to grant or increase financing for single-family homes and income-producing real estate would have to be made higher up the credit-decision-making chain. For each type of lending commitment, there is a distinct set of approval limits for decisions relating to short-term overruns or overdrafts.

The Board of Directors is at the top of the decision-making hierarchy and systematically reviews the most important credit-related decisions. Immediately below the Board of Directors are the Executive Board's Credit Committee (EBCC) and the Chief Credit Officer (CCO), who heads the Credit Management Division. The EBCC and the CCO have widespread lending authority, which encompasses all of the Bank's activities. For lower amounts, lending authority is allocated according to the activity, beginning with the sector-specific credit committees. Lower down still, the analysts in the Credit Management Division, with different levels of authority, have certain powers that are specific to their field. Finally, the front line has some lending authority. It is limited to fully secured lending commitments in a limited amount, temporary overdrafts or overruns, and certain employee loans.

Lending commitments to counterparties "reputed to be in financial difficulty" (RD) or "in default" (ID) are subject to a separate delegation chain. There is an additional set of approval limits for decisions relating to taking on credit risk abroad.

Decisions taken at a given approval level are checked *a posteriori* by the level above, through a full or selective review of lending decisions deemed to be significant.

Responsibility for identifying and monitoring provisioned loans

Any entity within the Bank that is involved in the lending process may suggest that a counterparty be included in the RD and ID categories on the basis of criteria that are defined in the same way for all of the Bank's activities. Entities with lending authority are authorized to decide whether to include a client in these categories.

A specialized department within the Credit Management Division monitors these commitments. It is separate from the front-line units that generate lending commitments. Once lending commitments are sound again, they are monitored by the front line.

Internal documentation and regulations

The guidelines for lending activities are set out in the Bank's Credit Policy. In particular, it sets out the

basic principle for how authority for granting and reviewing loans is allocated. The delegation chain is then explained in detail in the Bank's Lending Policy Rule Book. Together with the Technical Standards (technical criteria and limits for lending), these documents form the framework for the Bank's lending activities, which is established in accordance with the Bank's Risk Management Policy and Strategy.

The Executive Board defines and develops the Credit Policy, upon the recommendation of the CCO, and submits it to the Board of Directors (BoD) for approval. The BoD reviews the Credit Policy periodically. All those involved in the lending process are responsible for monitoring the Credit Policy and ensuring that it is adhered to. The CCO oversees its application.

The Lending Policy Rule Book sets out the rules and guidelines for decisions concerning the Bank's credit risk at the parent company level (delegation chain). It is established in accordance with the Bank's by-laws and Credit Policy.

The EBCC develops and submits the Lending Policy Rule Book and its updates to the BoD.

The Technical Standards define the type of collateral recognized by the Bank and, for each type of collateral, the loan-to-value ratio required for a loan to be consider secured. The Technical Standards are subject to validation by the BoD.

At the operational level, lending activities are structured around a series of internal directives that provide details of the guidelines set forth in the framework documents.

Risk assessment

Risk event

A credit-risk event is a default by a counterparty: the Bank considers a counterparty to be in default when the counterparty is past due more than 90 days on any material credit obligation to the Bank or when the Bank considers that the counterparty is unlikely to pay its credit obligations to the Bank in full. Impaired loans are the same as defaulted loans.

Past-due loans are loans where the counterparty is more than 90 days late on a payment obligation to the Bank. Past-due loans are considered defaulted loans apart from some exceptions related to operating procedures (total volume less than CHF 1 million). The Bank does not use the concept of a restructured exposure.

Risk exposure

The Bank considers all credit-risk exposure that arises from its activities, including its activities as a custodian bank, with the following counterparties or groups of counterparties:

- · Retail and private banking clients;
- Corporates, excluding trade finance;
- Trade finance;
- Fund-management companies;
- Public-sector entities (municipalities and regional, local, and national governments);
- Bank counterparties.

For any counterparty, exposure to credit risk in the trading book and banking book (both on and off the balance sheet) occurs in the following forms:

- Exposure in the form of a financial claim (mortgage loans, fixed-term advances, current accounts with credit limits, overdrafts, investments, and current accounts held by the Bank with other banks);
- Off-balance-sheet exposure resulting from undrawn portions of notified limits, contingent liabilities (guarantees) issued by the Bank on behalf of the counterparty, guarantees or other forms of

commitment (letters of credit, avalized drafts) received from the counterparty as collateral or for which the Bank takes over the risk;

- Exposure resulting from forward contracts and OTC derivatives, taking into account netting agreements and collateral management agreements;
- Exposure in terms of shares and other equity securities (including equity derivatives) for which the counterparty is the issuer (in the banking book and net positions in the trading book);
- Exposure resulting from repos/reverse repos and securities lending/borrowing transactions;
- Settlement exposure, especially on currency transactions. It should be noted that when positions are unwound through a simultaneous settlement system, such as CLS (Continuous Linked Settlement), settlement risk is not considered.

The methods defined determine the amount of exposure by category.

Loss metrics

The Bank uses two different loss metrics:

- Expected loss: The expected loss is determined on the basis of the probability of default and the loss given default for positions not relating to trade finance, and on the basis of slotting criteria for trade-finance positions. A general description of these methods is provided below.
- Book loss or a loan impairment charge: Most loan impairment charges are the result of a bottom-up calculation, position by position, following the discovery of RD and ID counterparties and an analysis of the corresponding exposure. These charges reflect the best a priori estimate of the loss on specific exposures. The amount of such charges is generally determined using a parameter-based method in which the provisioning ratio is determined and applied to credit-risk exposure. This method is different from that used to calculate the expected loss on performing loans. In some cases, for large commitments or for special or complex situations, the amount of the loan impairment charge is based on a scenario analysis. The Bank also allocates provisions for country risks, which are created whenever there is a major credit risk on commitments that are neither RD nor ID, for reasons relating to adverse situations in a country associated with the commitment.

For performing loans not relating to trade finance or real-estate development, the expected loss is determined on the basis of the probability of default and the loss given default.

Counterparties' probability of default, and rating of default risk

Each counterparty is assigned an internal counterparty default rating depending on its probability of default. Throughout the Bank (parent company), there are seven main internal ratings (B1 to B7) and 17 sub-ratings (B1.1 to B7).

The ratings B1 to B5.2 are used for counterparties that are neither RD nor ID; B5.3 and B6 are used for counterparties that are RD, which are also considered performing. Counterparties rated B7 are ID or non-performing. Loan impairment charges may be recognized for ID and RD counterparties.

A rating method is used to assign an internal rating to each performing counterparty. Counterparties (individuals, companies, banks, etc.) are distinguished by factors that may affect their solvency, the nature of available explanatory data and the level of loss-risk they represent. Rating methods are segmented into groups of counterparties so that counterparties that are deemed similar according to these analytical factors are handled in the same way.

For each rating segment the rating method for performing clients comprises a "score" and an "analyst's assessment." Considered together, the score and the analyst's assessment make up the method used to assign an internal rating to each performing counterparty.

 For the score component of the rating method, an internal rating is identified using one of the following three procedures: applying a calculation function for the probability of default calibrated statistically or based on an expert's assessment, assigning the counterparty to a

default probability slot, or transferring a counterparty from one rating to another in accordance with a system of rules. The Bank also employs standards and methods to recognize the impact on the probability of default of factors such as the business group or government support at a local, regional, or national level.

The "analyst's assessment" component of the rating method defines the guidelines to be
followed by an expert when analyzing the counterparty's debt quality, alongside the score. The
competent body sets and approves the internal rating that is eventually determined as well as
the override, if necessary.

Specific criteria are defined for the purpose of identifying RD counterparties. A counterparty is deemed RD when one of the following two conditions is met:

- The Bank believes there to be a high risk that part of its exposure to credit risk on the counterparty will not be recovered.
- A significant breach of the contract on any of the forms of credit extended to the counterparty by the Bank has occurred and has not been remedied without a temporary or definitive exemption being granted.

Loss given default

To calculate the loss given default, the Bank takes into account the expected exposure at the time of default, the expected coverage ratio at the time of default, the nature of the collateral, and the rate of loss on secured and unsecured parts. The internal models used are calibrated so that the loss given default produced by the calibrated model corresponds to an effective loss that takes into account discounted values of all cash flows paid and collected by the Bank after the default, including fees associated with managing the loans of counterparties in default and with recovering loans.

A supervisory slot is allocated to loans relating to real-estate development and trade finance in order to estimate the expected loss. The slot assignment is based on a structured analysis of the corresponding transactions. It meets the supervisory slotting criteria for specialized lending in Annex 4 of the International Convergence of Capital Measurement and Capital Standards: a Revised Framework (Basel II Accord).

Risk metrics

The Bank's main credit-risk metrics are:

- The expected loss (see above);
- Loss under stress scenarios. The Bank applies cyclicality stress tests and global stress tests:
 - Cyclicality stress tests for credit risk indicate the extent of the change in capital requirements in the event of an economic slowdown. They are based on changes in two key credit-risk variables, which are probability of default and loss given default;
 - Global stress tests are part of the broad approach for estimating (by risk category) the impact
 of a number of stress scenarios on the Bank's net profit in order to assess capital adequacy.
 For credit risk, this allows the need for new provisions to be estimated for each stress
 scenario, should it occur. The stress scenarios are defined for the entire lending portfolio on
 the basis of historical observations (for example, the property market correction in the early
 1990s) and macroeconomic analyses.

Unless otherwise indicated, credit-risk metrics address a risk horizon of 12 months.

Capital requirements for credit risk

For most of its credit-risk exposure (around 90% of risk-weighted assets), the Bank determines its regulatory capital requirements (Pillar 1) using the Foundation Internal Ratings-Based approach (F-IRB). For exposure outside the scope of the F-IRB approach, capital requirements are determined using the International Standardized Approach (SA-BIS).

Table 5. Credit-risk exposure by approach applied In CHF millions, at 31 December 2018, BCV Group (CRE)⁸

_	Credit risk Counterparty Credit risk					
Category	F-IRB	SA-BIS	F-IRB	SA-BIS	Total	
Central governments and central banks	-	100%	-	0%	9,076	
Banks and securities firms	62%	19%	18%	1%	3,228	
Non-central govt. public-sector entities; multilateral development banks	43%	57%	0%	-	1,567	
Corporates	84%	16%	0%	0%	16,097	
Retail	96%	4%	0%	0%	19,012	
Total	70%	28%	1%	0%	48,980	

Exposures outside the scope of the F-IRB approach include those for which the Bank does not intend to put in place a rating model. These exposures include the Swiss National Bank, the Swiss Federal Government, Swiss cantonal governments, the Mortgage-Bond Bank of the Swiss Mortgage Institutions, the Central Mortgage-Bond Institution, some foreign bank and sovereign bond issuers, SMEs that do not yet have financial statements, insurance companies, investment funds, counterparties with no loan agreement (i.e., for overdrafts), and exposures at the Bank's subsidiaries.

Table 6. Risk-weighted assets by approach applied In CHF millions, at 31 December 2018, BCV Group (CRE)

_	Credit risk		Counterparty credit risk		
Category	F-IRB	SA-BIS	F-IRB	SA-BIS	Total
Central governments and central banks	-	100%	-	-	0
Banks and securities firms	73%	20%	7%	1%	1,172
Non-central govt. public-sector entities; multilateral development banks	51%	49%	0%	-	424
Corporates	90%	9%	1%	0%	9,078
Retail	94%	6%	0%	0%	4,344
Total	89%	10%	1%	0%	15,019

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⁸Exposure at default (EAD) after applying credit conversion factors. Credit risk and counterparty credit risk excluding non-counterparty-related assets, credit valuation adjustments, and central counterparties. Categories defined by FINMA (Tables CR4 and CR7), also described in Section 7.3.2.

4.2 Loans and debt securities

This section covers loans to customers and banks (excluding securities financing transactions and derivatives) and debt securities in the financial investments portfolio. These loans and debt securities correspond to the credit-risk exposure set out in FINMA Circular 2016/1 "Disclosure – banks." Securities financing transactions (repo and reverse repo agreements) and derivatives are discussed in Section 4.3, "Counterparty credit risk."

4.2.1 Portfolio quality

Most loans to customers are located in Vaud Canton (79%). They are composed primarily of on-balance-sheet exposure in the form of mortgage loans and various financing in the form of current accounts (e.g., loans for construction, operational, investment, or cash-management purposes).

Most of the exposure to banks and debt securities is in Switzerland (84%) but outside of Vaud Canton. These exposures mainly comprise cash held with the SNB, investments with the Central Mortgage-Bond Institution and the Mortgage-Bond Bank of the Swiss Mortgage Institutions, and exposures to other Swiss banks. Exposure in the European Union arises mainly from cash-management and trading transactions, whereas exposure in the rest of the world is a result of trade-finance activities.

Table 7. Credit-risk exposure by type of exposure and region In CHF millions, at 31 December 2018, BCV Group, (CRB)⁹

	Non-			
Davien	impaired	Impaired	Provisions and	Total
Region	exposure	exposure	impairments	exposure
Customer loans	37,540	320	95	37,860
Vaud Canton	29,824	240	55	30,064
Rest of Switzerland	5,335	46	9	5,381
European Union and North	371	4	3	375
America				
Rest of world	2,009	31	28	2,040
Bank loans and debt securities	14,426	-	0	14,426
Vaud Canton	10	-	0	10
Rest of Switzerland	12,039	-	-	12,039
European Union and North	1,386	-	-	1,386
America				
Rest of world	990	-	-	990
Total	51,966	320	95	52,285

⁹Tables 7 through 9 show exposure at default (EAD) before applying credit conversion factors. Non-counterparty-related assets are not included.

Table 8. Credit-risk exposure by risk segment

In CHF millions, at 31 December 2018, BCV Group, (CRB)

,	Non-		Provisions	
	impaired	Impaired	and	Total
Risk segment	exposure	exposure	impairments	exposure
On- and off-balance-sheet exposure	48,285	320	95	48,605
Retail	10,309	76	10	10,385
Private banking	7,203	75	12	7,278
SMEs	4,608	94	36	4,702
Real-estate professionals	7,665	39	4	7,705
Large corporates	3,457	2	2	3,460
Public-sector entities	2,176	-	-	2,176
Trade finance	2,052	34	30	2,086
Banks	10,813	-	0	10,813
Debt securities	3,681	-	-	3,681
Total	51,966	320	95	52,285

The Bank classifies counterparties into eight risk segments according to their type, main business, and extent of the banking relationship with BCV.¹⁰

A large percentage of the Bank's exposure (34%) represents lending to retail and private banking customers in the form of mortgages and Lombard loans.

Companies account for 34% of total exposure, which is divided among SMEs, real-estate professionals, large corporates, and trade-finance counterparties.

Public-sector exposure mainly consists of limits granted to the Swiss Federal Government, municipalities, and the Vaud Cantonal Government.

Bank counterparties account for 21% of total exposure, comprised mostly of cash deposited with the SNB.

Debt securities account for 7% of total exposure and include investments with the Mortgage-Bond Bank of the Swiss Mortgage Institutions and the Central Mortgage-Bond Institution in the amount of CHF 1.9bn.

¹⁰Risk segments are described in Section 7.3.2.

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Table 9. Breakdown of exposure by residual contractual maturity

In CHF millions, at 31 December 2018, BCV Group, (CRB)

				No		Total
Category	< 1 yr	1-5 yrs	> 5 yrs	maturity	Subsidiaries	Group
Central governments and central banks	314	458	87	8,051	186	9,097
Banks and securities firms	1,398	373	349	1,144	21	3,286
Non-central govt. public-sector entities; multilateral development banks	555	628	795	607	2	2,588
Corporates	3,822	2,576	1,513	10,365	15	18,291
Retail	452	82	128	17,645	718	19,025
Total	6,541	4,118	2,871	37,812	942	52,285

There is no contractual maturity date for repayment on 72% of the Bank's exposure. This is the case for cash held with the SNB, all mortgage loans, and some credit limits. Most mortgage loans are currently fixed-rate loans, which means there are maturity dates on which the loans can be renewed. At the maturity dates, most fixed-rate loans are renewed with new interest rates. For tax reasons, it is rare for clients residing in Switzerland to fully pay down their mortgage loan.

Table 10. Credit quality of assets

In CHF millions, BCV Group, at 31 December 2018 (CR1)

		а	b	С	d
		Gross carry	ring value of		
		Defaulted	Non-defaulted	Provisions and	
		exposure	exposure	impairments	Net value
1	Loans (excl. debt	318	41,579	94	41,803
	securities)				
2	Debt securities	-	3,681	-	3,681
3	Off-balance-sheet exposure	2	6,706	1	6,707
4	Total	320	51,966	95	52,191

Defaulted loans amounted to CHF 320m at 31 December 2018 and accounted for 0.6% of total exposure. A provision of CHF 95m was recognized for these loans; this represents an average provisioning rate of 30%, reflecting the high quality of the collateral provided on these loans. Provisions are determined individually for each defaulted loan, taking into account the liquidation value of collateral and the characteristics of the counterparty.

Provisions for latent risks cover high-risk loans to counterparties "reputed to be in financial difficulty" (CHF 3.1m at 31 December 2018), together with country risk (zero at 31 December 2018). Provisions for country risk cover non-defaulted exposure in countries where the financial or settlement risk rating is below a given threshold.

Table 11. Changes in the stock of defaulted loans and debt securities In CHF millions, BCV Group, (CR2)

а **Defaulted loans** Defaulted loans and debt securities at end of previous reporting 1 303 2 Loans and debt securities that have defaulted since the last reporting 68 3 Amounts returned to non-defaulted status 37 4 Amounts written down or written off 3 5 Other changes -11 6 Defaulted loans and debt securities at end of reporting period 320

Defaulted exposure rose CHF 17m over the period. 85% of defaulted loans went into default in or after 2014.

4.2.2 Risk mitigation

The Bank seeks to appropriately secure its exposure through the use of collateral. Various types of collateral are recognized. They include:¹¹

- Pledges on real estate (primarily mortgage deeds on various types of real estate);
- Pledges on financial assets (mainly cash and securities accounts);
- Guarantees (mainly loan guarantees and bank guarantees).

The valuation of collateral recognized by the Bank is based on the principle of market value, and is carried out as often as appropriate for the type of collateral. Pledges on real estate and financial assets are valued as follows:

- The valuation of pledged real estate is carried out using methods appropriate to the type of real
 estate: models are used for standard real estate like houses and apartments, while other types of
 properties, like hotels, are appraised. The frequency at which real estate is valued depends on the
 type of property, as do the standard loan-to-value ratios for the loans secured by this collateral.
- Securities portfolios and other financial assets pledged as collateral for Lombard loans are valued daily. Loan-to-value ratios are defined by type (shares, debt securities, fund units, fiduciary accounts, precious metals, or structured products), country of domicile, currency risk, the liquidity of the security, the counterparty's default risk, and the residual term for debt securities, together with portfolio diversification.

¹¹BCV does not net out on- or off-balance-sheet items (except for securities financing transactions and derivatives, which are discussed in the "Counterparty credit risk" section).

Table 12. Credit-risk mitigation techniques – overview In CHF millions, at 31 December 2018, BCV Group, (CR3)¹²

		a	b1	b	d
		Exposures unsecured: carrying amount	Exposures secured	Exposures secured by collateral	Exposures secured by financial guarantees
1	Loans (excl. debt securities)	14,664	27,139	26,530	609
2	Debt securities	3,582	98	-	98
3	Total	18,246	27,237	26,530	707
4	Of which: defaulted	49	179	179	0

4.2.3 IRB approach

4.2.3.1 IRB approach (excluding specialized lending)

BCV obtained approval from FINMA to use the Basel Foundation IRB approach (F-IRB) to determine regulatory capital requirements for credit risk beginning on 1 January 2009.

Structure of IRB rating systems

The rating system for default risk is composed of a series of rating models. In all cases, the aim is to assess the one-year probability of default, in the form of an internal counterparty default rating. The following models are used for the categories for which the Bank obtained F-IRB approval (they are named after the population to which they apply):

- BCV staff (default probability pool);
- Private banking (default probability pool);
- Retail (default probability statistical scores);
- SMEs (several default probability statistical scores, depending on the nature of the client and the data available);
- Large corporates (expert default-probability scores);
- Banks (expert default-probability scores);
- Municipalities in Vaud Canton (expert default-probability scores).

The Bank has also defined and implemented a system of rules governing the transmission of internal ratings for counterparties that are related in terms of credit risk. The scores are accompanied by the analyst assessment rules.

All these models, with the exception of the rating model for bank counterparties, generate an estimate of the probability of default without using external ratings. When assessing default risk, the rating model used for bank counterparties takes into account, among other factors, the ratings issued by the main ratings agencies (Moody's, Fitch, and Standard & Poor's).

 12 Columns f and g are not included because BCV does not have any credit derivative exposure.

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The Bank determined the scope of application of its models by grouping together similar counterparties; i.e., counterparties that could all default for related reasons and for which the Bank has a set of common data that can be used for modeling. The scope of its models matches these groups where they present a material, coherent risk.

Internal loss given default (LGD) and exposure at default (EAD) models are used to calculate regulatory capital requirements for retail portfolios.

LGD is the economic loss to the Bank if a counterparty defaults. The economic loss is calculated as the difference between the Bank's exposure to the counterparty at the time of default and the present value of all cash flows that the Bank stands to receive from the counterparty after its default. The Bank's internal LGD model factors in both the loss on the exposure and the workout costs. LGD is calculated by loan tranche, as each tranche is secured by different collateral (e.g., real estate, other securities, and guarantees); there may also be a portion not secured by collateral. Each tranche is given a loss rate. The LGD for the total loan is generally the weighted average of the loss rates for each tranche, including any unsecured tranches. The loss rates for each type of collateral are determined using data from a recessionary period in Vaud Canton (the early 1990s) to include the downturn characteristics required by regulators. A counterparty's LGD is separate from its probability of default (PD).

The credit conversion factors (CCFs) used for the Bank's internal EAD model are either calculated using a conservative approach (100% for undrawn credit limits) or based on prudential CCFs (contingent liabilities).

Use of ratings

In addition to being used to calculate regulatory capital requirements under the F-IRB approach, internal ratings are used for numerous purposes (in the front, middle, and back offices). Here are the main uses:

- Decision-making support when credit facilities and other commitments are granted or renewed;
- Defining lending authority and the intensity of monitoring;
- Setting risk-adjusted prices;
- Creating provisions;
- Monitoring the performance of business units;
- Analyzing risk on the lending book;
- Strategic planning.

The scope of application of certain models for internal needs goes significantly beyond the scope of the corresponding F-IRB approval. Internal LGD/EAD models are used to estimate the expected loss on most of the Bank's credit portfolios and not only on the retail portfolios. Furthermore, internal rating models for default risk are used for a number of portfolios for which the Bank does not intend to seek IRB approval.

Managing and integrating the reduction in credit risk

The principles used to recognize and value collateral are the same for the portfolios for which BCV has obtained F-IRB approval for calculating regulatory capital requirements as for the rest of its lending portfolio.

Rating system's control mechanism

The rating system's control mechanism obeys the principles of the Bank's internal control system. It is composed of three levels of internal oversight. The first two levels are under the responsibility of the

Executive Board, while the third level falls under the Board of Directors:

 Level 1: operational and managerial oversight of business activities, in accordance with the chain of command.

- Level 2: monitoring the appropriateness and effectiveness of level 1 by independent entities.
- Level 3: periodic independent review of levels 1 and 2 by the Internal Audit Department.

For the rating models (PD, LGD, and EAD), or other models affecting the assessment of credit risk, three steps are defined. The objectives and responsibilities for each step are as follows:

Step 1: initial validation

Key components of the initial validation include monitoring the following: the logic of the design; the quality of the data; the selection of variables; the modeling process; the development of results; documentation; programming; and implementation.

Preparatory work for the initial validation is conducted within the Risk Management Department by the units responsible for developing the models as part of their development and improvement work. Operational and managerial oversight of this work (level 1) is also done by these units, under the supervision and responsibility of the head of the Risk Management Department.

The Validation of Rating Models unit, under the CFO's responsibility, challenges and monitors in both qualitative and quantitative terms the development and improvement work and the initial validation (level 2 oversight) and issues an opinion for the purposes of the initial validation by the Executive Board's Risk Management Committee (EBRMC).

The unit does this using documents drawn up by the Risk Management Department explaining the main choices made in designing the models and describing the quantitative methods used and the results obtained. The documents also indicate the results expected from the models using a set of standardized indicators for explanatory power (for PD models) and indicators of the degree of prudence. The design document for each model is tailored to the type and complexity of the model in question (i.e., whether it is based on a statistical calculation or an expert assessment).

As part of its monitoring work, the Validation of Rating Models unit issues a report of this assessment and its conclusions.

The EBRMC is responsible for the initial validation of a new or improved model, and, by extension, for authorizing its implementation. It bases its validation decisions on reports from the Risk Management Department that summarize the design documents, and on reports from the Validation of Rating Models unit that summarize the findings of the unit's independent assessment and include a recommendation for the initial validation.

Step 2: monitoring the use of models

This refers to the application of models in the Bank's credit and piloting processes.

For the credit process, analysts from the Credit Management Division and the front office are responsible for using the models and thus for calculating the estimators produced by the models. Analysts and the front office are also responsible for ensuring that the estimators are appropriately used in the context of credit decisions (decisions to grant credit as well as pricing decisions). These activities are subject to operational and managerial oversight which is defined by the analysts and the front office (level 1).

For piloting needs, various departments use the estimators produced by these models in the lending process. The Risk Management Department in particular uses rating models to analyze and monitor risk on the loan book and to calculate capital requirements.

Step 3: ongoing validation

Key components of ongoing validation include ensuring appropriate use of the models and compliance with structural and design-related hypotheses, and backtesting performance (precision and discriminating capacity).

Preparatory work for ongoing validation is conducted by the units responsible for developing the models. These units also propose any necessary measures to be taken in response to the results obtained. Operational and managerial oversight of this work (level 1) is carried out by these units, under the supervision and responsibility of the head of the Risk Management Department.

As during the initial validation, the Validation of Rating Models unit, under the supervision and responsibility of the CFO, challenges and monitors in both qualitative and quantitative terms the ongoing validation (level 2) and issues an opinion on the results of the ongoing validation and the measures proposed, for ongoing validation by the EBRMC.

The unit does this using documents drawn up by the Risk Management Department that describe all the models and characterize their results using a set of standardized indicators for explanatory power (for PD models) and indicators of the degree of prudence.

As part of its monitoring work, the Validation of Rating Models unit issues a report of this assessment and its conclusions.

The EBRMC is responsible for the ongoing validation of a model and for possible measures to be taken in this regard. It is therefore responsible for authorizing a model's continued use, including constraints and measures to be taken. It bases its validation decisions on reports from the Risk Management Department that summarize the ongoing-validation documents, and on reports from the Validation of Rating Models unit that summarize the findings of the unit's independent assessment and include a recommendation for the ongoing validation.

Operational principle behind model validation

The core principle underlying the activities of the Validation of Rating Models unit is "close, but independent." Proximity is achieved by involving the unit in the entire process, starting with the initial steps taken by the design teams, both through regular support and regular discussions. Independence is achieved through the use of operational principles overseen by the EBRMC itself.

Table 13. IRB – Credit-risk exposure by portfolio and PD range In CHF millions, at 31 December 2018, BCV Group, (CR6)

		а	b	С	d	е	f	a	h	i	i	k	1
		On-	Off-	0	u	C		9			J	N.	
		balance-	balance-		EAD post-		Number						
		sheet	sheet	Average	CRM and	Average	of	Average	Average		RWA		
	PD range	exposure	exposure	CCF	post-CCF	PD	obligors	LGD	maturity	RWA	density	EL	Provisions
3	Banks and secur	ities firms (F-I	RB)										
	0.00 to <0.15	1,384	463	33%	1,537	0.04%	137	45%	2.02	299	19%	0	
	0.15 to <0.25	174	57	20%	186	0.21%	18	45%	2.26	113	61%	0	
	0.25 to <0.50	5	32	23%	12	0.37%	15	45%	1.00	7	62%	0	-
	0.50 to <0.75	10	21	22%	14	0.57%	8	45%	1.00	11	77%	0	
	0.75 to <2.50	45	22	23%	50	0.86%	15	45%	1.00	46	93%	0	
	2.50 to <10.00	162	217	24%	213	6.07%	57	45%	1.00	382	179%	6	
	10.00 to <100.00	-	-	-	-	-	-	-	-	-	-	-	
_	100.00 (default)	-	-	-	-	-	-	-	-	-	-	-	-
	Sub-total	1,780	812	29%	2,012	0.72%	250	45%	1.90	858	43%	7	-
		· · · · · · · · · · · · · · · · · · ·			<u>-</u>								
5_	Non-central govt												
	0.00 to <0.15	670	478	0%	646	0.06%	231	45%	3.66	197	30%	0	_
_	0.15 to <0.25	19	11	-	19	0.21%	12	45%	3.21	10	55%	0	_
	0.25 to <0.50	2	7	-	1	0.37%	7	45%	1.86	1	57%	0	
	0.50 to <0.75	9	-	-	9	0.57%	1	45%	3.48	9	91%	0	
	0.75 to <2.50	1	-	-	0	1.22%	1	45%	4.93	0	138%	0	
	2.50 to <10.00	-	=	-	-	-	-	-	=	-	-	-	
	10.00 to <100.00	-	-	-	-	-	-	-	-	-	-	-	
	100.00 (default)	-	-	-	-	-	-	-	-	-	-	-	
	Sub-total	701	496	0%	675	0.07%	252	45%	3.64	216	32%	0	-
9	Corporates - other	er lending (F-II	PR)										
<u> </u>	0.00 to <0.15	1,557	1,057	26%	1,816	0.08%	215	44%	2.34	429	24%	1	
	0.15 to <0.25	339	326	31%	438	0.21%	87	44%	2.39	193	44%	0	-
—	0.25 to <0.50	779	243	45%	881	0.37%	164	44%	2.58	526	60%	1	
_	0.50 to <0.75	194	68	30%	210	0.57%	62	43%	2.17	135	64%	1	-
	0.75 to <2.50	933	298	26%	1,005	1.27%	288	44%	2.19	885	88%	6	_
	2.50 to <10.00	123	43	31%	135	4.09%	36	45%	1.75	169	125%	2	
_	10.00 to <100.00	10	0		10	21.00%	3	43%	1.92	20	198%	1	
—	100.00 (default)	89	0	44%	89	100.00%	17	25%	2.43	65	73%	22	
	Sub-total	4,024	2,035	29%	4,583	0.60%	871	44%	2.34	2,421	53%	34	25

		-	С	d	е	f	g	h i	j	k		1
PD range	On- balance- sheet exposure	Off- balance- sheet exposure	Average CCF	EAD post- CRM and post-CCF	Average PD	Number of obligors	Average LGD	Average maturity	RWA	RWA density	EL	Provisio
Mortgage-backed	l retail exposur	re										
0.00 to <0.15	6,754	42	100%	6,796	0.09%	16,783	13%	2.50	393	6%	1	
0.15 to <0.25	3,504	38	100%	3,542	0.21%	6,334	16%	2.50	443	13%	1	-
0.25 to <0.50	2,969	50	100%	3,019	0.37%	4,310	19%	2.51	689	23%	2	-
0.50 to <0.75	1,116	15	100%	1,131	0.57%	1,619	20%	2.50	348	31%	1	-
0.75 to <2.50	2,132	48	98%	2,180	1.32%	3,088	20%	2.49	1,151	53%	6	-
2.50 to <10.00	391	6	96%	397	4.86%	542	20%	2.49	449	113%	4	•
10.00 to <100.00	13	0	100%	13	21.00%	18	22%	2.49	28	210%	1	-
100.00 (default)	134	0	91%	134	100.00%	140	7%	2.47	226	169%	9	•
Sub-total	17,013	201	99%	17,212	0.48%	32,834	16%	2.50	3,726	22%	25	
Other retail expos	sure											
0.00 to <0.15	307	243	100%	549	0.11%	1,421	15%	1.44	23	4%	0	
0.15 to <0.25	30	43	98%	72	0.21%	,962	51%	1.61	17	23%	0	-
0.25 to <0.50	30	58	98%	87	0.37%	,605	77%	1.63	43	49%	0	-
0.50 to <0.75	23	42	92%	61	0.57%	362	80%	1.47	40	66%	0	-
0.75 to <2.50	96	113	93%	201	1.33%	1,899	74%	1.66	171	85%	2	-
2.50 to <10.00	26	9	95%	35	4.59%	360	65%	1.90	35	100%	1	-
10.00 to <100.00	0	0	100%	0	21.00%	6	44%	1.80	0	107%	0	-
100.00 (default)	28	2	86%	30	100.00%	275	72%	2.42	9	29%	22	-
Sub-total	541	509	97%	1,036	0.57%	5,890	41%	1.56	337	33%	25	

In Tables 13 and 15, the average PD subtotals do not include defaulted exposure

The segmentation of the Bank's default rating system into groups of counterparties is adapted to the Bank's risk management needs and to its business activities. Within the Bank, both the initial and ongoing model validations are conducted according to these groups. The validation process is distinct from the exposure categorization set forth under Basel III.

The "Banks and securities firms (F-IRB)" portfolio is covered by the bank rating model. The "Noncentral government public-sector entities; multilateral development banks (F-IRB)" portfolio is covered by the rating model for Vaud municipalities. The "Corporates – other lending (F-IRB)" portfolio is covered by three rating models (for large corporates, SMEs, and joint and several co-debtors). The "Mortgage-backed retail exposure" portfolio is covered by three rating models (one for retail customers, one for BCV employees, and one for private banking clients). The "Other retail exposure" portfolio is covered by four rating models (one for retail customers, one for BCV employees, one for private banking clients, and one for SMEs).

Table 14. RWA flow statements of credit-risk exposure

In CHF millions, BCV Group, (CR8)

		a
		RWA amount
1	RWA at end of previous reporting period	6,338
2	Asset size	+180
3	Asset quality	+51
4	Model updates	+996
5	Methodology and policy	+0
6	Acquisitions and disposals	+0
7	Foreign exchange movements	-6
8	Other	+0
9	RWA at end of reporting period	7,559

The amount of risk-weighted assets determined using the IRB approach (excluding specialized lending) grew by CHF 1.2bn over the second half, due to the fact that the Bank obtained approval from FINMA to use its internal rating model for large corporate counterparties. As of 31 December 2018, exposures to these counterparties have been determined using the F-IRB approach; prior to that date, the SA-BIS approach was used.

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Table 15. IRB – Backtesting of PD per portfolio In CHF millions, at 31 December 2018, BCV Group, (CR9)

а	b	d	е	f	g	h	i	j
			_	Number of	obligors			
			Arithmetic	End of			Of which: new	Average historical
	20	Weighted	average PD	previous	End of	Defaulted obligors	defaulted obligors	annual default
	PD range	average PD	by obligors	year	year	in the year	in the year	rate, 2010-2018
3	Banks and secu			107	101			
	0.00 to <0.07	0.03%	0.04%	107	124			<u> </u>
	0.07 to <0.28	0.18%	0.17%	27	32			<u> </u>
	0.28 to <1.44	0.73%	0.62%	50	38			-
	1.44 to <4.30	3.41%	3.41%	10	17			<u> </u>
	4.30 to <8.99	7.08%	7.08%	20	40			-
	8.99 to <100.00	-	-	-	-			-
	100.00 (default)	-						<u> </u>
	Sub-total	0.72%	1.50%	214	250	-	-	-
5	Non-central gov				•	s (F-IRB)		
	0.00 to <0.07	0.05%	0.05%	189	196			-
	0.07 to <0.28	0.12%	0.14%	54	47			-
	0.28 to <1.44	0.57%	0.49%	5	9			-
	1.44 to <4.30	-	-	-	-			-
	4.30 to <8.99	-	-	-	-			-
	8.99 to <100.00	-	-	-	-			-
	100.00 (default)	-	-	-	-			-
	Sub-total	0.07%	0.08%	248	252	-	-	-
9	Corporates - otl	her lending (F-	IRB)					
	0.00 to <0.07	0.05%	0.05%	49	83			-
	0.07 to <0.28	0.14%	0.15%	164	218			-
	0.28 to <1.44	0.65%	0.69%	352	420			0.15%
	1.44 to <4.30	2.28%	2.27%	106	120			2.03%
	4.30 to <8.99	5.69%	5.56%	8	9			16.42%
	8.99 to <100.00	21.00%	21.00%	2	3			23.21%
	100.00 (default)	100.00%	100.00%	13	17			-
	Sub-total	0.60%	0.84%	693	871	6	-	0.64%

а	b	d	е	f	g	h	i	j
				Number of c	bligors			
			Arithmetic	End of	_		Of which: new	Average historical
		Weighted	average PD	previous	End of	Defaulted obligors	defaulted obligors	annual default
	PD range	average PD	by obligors	year	year	in the year	in the year	rate, 2010-2018
11	Mortgage-backe	•						
	0.00 to <0.07	0.05%	0.05%	7,396	7,111			0.05%
	0.07 to <0.28	0.15%	0.15%	15,750	16,006			0.07%
	0.28 to <1.44	0.58%	0.58%	8,072	8,136			0.24%
	1.44 to <4.30	2.39%	2.38%	1,247	1,165			1.26%
	4.30 to <8.99	6.46%	6.39%	249	258			4.89%
	8.99 to <100.00	21.00%	21.00%	20	18			15.92%
	100.00 (default)	100.00%	100.00%	142	140			-
-	Sub-total	0.48%	0.37%	32,875	32,834	64	-	0.20%
13	Other retail expo	osure						
	0.00 to <0.07	0.05%	0.05%	126	108			0.40%
	0.07 to <0.28	0.12%	0.15%	2,534	2,275			0.17%
	0.28 to <1.44	0.72%	0.69%	3,032	1,713			0.69%
	1.44 to <4.30	2.37%	2.39%	1,678	1,341			2.42%
	4.30 to <8.99	6.02%	6.05%	219	172			6.72%
	8.99 to <100.00	21.00%	21.00%	11	6			19.68%
	100.00 (default)	100.00%	100.00%	301	275			-
	Sub-total	0.57%	1.05%	7,902	5,890	103	2	1.03%
	Total	0.51%	0.49%	41,932	40,098	173	2	0.35%

		b	С
Internal rating	PD range	External rating equivalent	
B1	0.00 to <0.07	AAA/Aaa to A-/A3	
B2	0.07 to <0.28	BBB+/Baa1 to BBB/Baa2	
B3	0.28 to <1.44	BBB-/Baa3 to BB-/Ba3	
B4	1.44 to <4.30	B+/B1	
B5	4.30 to <8.99	B/B2 to B-/B3	
B6	8.99 to <100.00	CCC+/Caa1 to C/C	
B7	100.00 (default)	D	

Within the IRB scope, the average number of defaults in the period analyzed (2010 to 2018) was lower than the expected number based on the PD rating models. The difference is mainly due to the conservative nature of the models and to general economic growth during the period.

4.2.3.2 Slotting approach for specialized lending

The Bank uses slotting criteria for the financing of income-producing real estate (real-estate professionals) and for commodities financing (trade finance). For these two categories, FINMA has authorized BCV to assign preferential risk weights to "strong" and "good" exposures (Basel III Accord, §277).

For real-estate professionals (except real-estate development), the slots are determined on the basis of the probability of default (PD), loss given default (LGD), and exposure at default (EAD) models that are internally applied to each credit exposure in the real-estate professionals category. A specific mechanism used to calculate capital requirements has been set up to determine the PD of real-estate professionals in order to reduce the sensitivity of regulatory capital to the business cycle.

For real-estate development projects intended for sale, a slot is allocated directly to each credit exposure without applying the PD, LGD, and EAD models used for other exposures in the real-estate professionals category. A similar direct slotting system is in place for trade finance transactions.

These slotting systems meet the supervisory slotting criteria for specialized lending in Annex 4 of the International Convergence of Capital Measurement and Capital Standards: a Revised Framework (Basel II Accord).

Table 16. IRB – Specialized lending under the simple risk-weight method In CHF millions, at 31 December 2018, BCV Group, (CR10)¹³

				Ехро	sure amo			
Regulatory category	On-balance sheet amount	Off-balance sheet amount	RW	CF	IPRE	Total	RWA	Expected loss
Strong	4,424	715	50%	811	4,103	4,914	2,604	1
Good	3,034	591	70%	1,024	2,486	3,510	2,604	14
Satisfactory	370	78	115%	217	205	422	515	12
Weak	1	-	250%	0	0	1	2	0
Default	44	0	_	33	11	44	12	22
Total	7,872	1,384		2,085	6,805	8,890	5,736	49

Lending to real-estate professionals increased by CHF 295m in the second half of 2018. The vast majority (97%) of the Bank's real-estate exposure is in the "strong" and "good" slots. This is because this exposure is mainly associated with financing for real-estate investors that is adequately secured by property.

The Bank's trade-finance exposure grew by CHF 19m in the second half of 2018. 88% of trade-finance transactions are in the "strong" and "good" slots, as they are secured by recognized collateral (especially cash and merchandise).

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¹³Table CR10 of the Basel Accord covers specialized lending and equities under the simple risk-weight method. In this report, specialized lending is covered in this table while equities are covered in Table 24 (in Section 5.2, "Risk on equity securities in the banking book"). This table does not include remaining maturities since preferential weights have been applied.

4.2.4 Standardized Approach

FINMA defines the risk weightings to be applied for exposure treated using the SA-BIS by type of counterparty (CAO, Annex 2). In this case, FINMA authorizes the use of external ratings (CAO, Article 64) provided that:

- 1. The ratings are supplied by ratings agencies recognized by FINMA.
- 2. External ratings are applied systematically by the Bank using a precise and specific approach.
- 3. Where the Bank uses external ratings to determine the risk weightings for a category of positions, the entire category must in principle be weighted through the use of external ratings.

The Bank uses, where available, Standard & Poor's ratings to determine the risk weightings of almost all counterparties for which the SA-BIS is applied. These counterparties are essentially counterparties for debt securities in the financial investments portfolio. For corporate clients with no external rating, a weighting of 100% ("no rating") is used.

Corporate clients make up 20% of the portfolio that is assessed using the SA-BIS. This category includes bonds from the Central Mortgage-Bond Institution and the Mortgage-Bond Bank of the Swiss Mortgage Institutions (weighting of 20%), commercial loans that are outside the scope of the parent company's F-IRB approach (i.e., SMEs that do not yet have financial statements, insurance companies, and investment funds), and corporate exposures at the Bank's subsidiaries.

The category "Central governments and central banks" consists primarily of exposure to the SNB (weighting of 0%) and the Swiss Federal Government (weighting of 0%).

Table 17. Standardized Approach – Credit-risk exposure and credit-risk mitigation (CRM) effects In CHF millions, at 31 December 2018, BCV Group, (CR4)¹⁴

		а	b	С	d	е	f
		Exposure before	Exposure before CCF and CRM		Exposure post-CCF and post-CRM		
		On-balance-sheet	Off-balance-sheet	On-balance-sheet	Off-balance-sheet		RWA
	Category	amount	amount	amount	amount	RWA	density
1	Central governments and central banks	9,045	52	9,045	-	0	0%
2	Banks and securities firms	564	130	564	65	229	36%
3	Non-central govt. public-sector entities; multilateral development banks	887	502	887	1	207	23%
4	Corporates	2,414	558	2,349	191	855	34%
5	Retail	728	28	728	26	279	37%
8	Total	13,637	1,270	13,572	283	1,570	11%

The impact of risk mitigation measures is low in the scope of the SA-BIS. This is due to the predominance of exposure to the SNB, the Central Mortgage-Bond Institution, the Mortgage-Bond Bank of the Swiss Mortgage Institutions, and the Swiss federal and cantonal governments, which are generally not secured by financial guarantees. The Bank recognizes the Export Risk Guarantees provided by the Swiss Export Risk Insurance (SERV) program. The amount covered by these guarantees is less than CHF 10m.

¹⁴Equities (row 6 in the FINMA table) are not included in this table because they are covered in Table 16 (IRB).

Table 18. Standardized Approach – Exposure by asset class and risk weight In CHF millions, at 31 December 2018, BCV Group, (CR5)

		а	С	d	е	f	g	h	j
	Octobrom/Dielesseinkt	00/	200/	250/	F00/	750/	4000/	4500/	Total credit exposure post- CCF and post-
	Category/Risk weight	0%	20%	35%	50%	75%	100%	150%	CRM
1	Central governments and central banks	9,044	-	-	-	-	0	-	9,045
2	Banks and securities firms	0	490	-	15	-	124	-	629
3	Non-central govt. public-sector entities; multilateral development banks	-	791	-	98	-	-	-	889
4	Corporates	51	1,989	57	-	5	437	0	2,539
5	Retail	0	-	427	-	113	212	0	753
7	Other assets	-	-	-	-	-	-	-	-
8	Total	9,095	3,270	484	113	119	773	0	13,855
9	Of which: secured by residential property	-	-	486	-	23	16	-	525
10	Of which: past-due loans	-	-	-	-	0	0	-	-

4.3 Counterparty credit risk

The Bank's counterparty credit risk (CCR) exposure includes securities financing transactions and derivative transactions. The framework for such exposure is set forth in the RMPS as well as in a BCV directive on collateralized contracts, which addresses governance, risk-taking limits, collateral eligibility, monitoring, and reporting.

Securities financing transactions (SFTs)

The majority of the Bank's SFTs are repo and reverse repo agreements. The Bank also began conducting securities borrowing transactions in 2017, but this is a marginal activity.

The Bank uses repo and reverse repo agreements to manage liquidity. These agreements are processed using a triparty system in which the triparty agent (SIX or Euroclear) is responsible for clearing. Throughout the lifetime of a repurchase agreement, the triparty agent carries out margin calls at least once per day to account for any change in the market value of the securities and any thresholds, and directly carries out any necessary transfers using securities or cash held with the triparty agent.

The Bank's repo and reverse repo agreements are based on standard contracts such as the GMRA or the Swiss Master Agreement for Repo Trades. Collateral eligibility is determined by SIX when it is the triparty agent (SNB basket) or agreed upon by the counterparties when Euroclear is the triparty agent. Collateral must meet the eligibility criteria set forth in the BCV directive (e.g., be a readily marketable stock, a bond with a rating of at least BBB- or equivalent, or a security independent of the counterparty's solvency).

SFT counterparties are banks, insurance companies, and large corporates. Limits are granted according to the lending process and lending authority described in Section 4.1. They are monitored daily on an individual basis. The Bank monitors the quality of securities received daily as collateral using a portfolio approach, with particular attention paid to risk concentration.

When calculating capital requirements, the Bank's exposure is determined using the comprehensive approach (CAO, Article 62.1(b)). Capital requirements are determined using the IRB or SA-BIS approach depending on the type of counterparty.

Non-centrally cleared OTC derivatives

Limits for OTC derivatives (including forward contracts) that are not centrally cleared (cleared bilaterally) are mainly granted to bank counterparties in order to carry out trading operations and interest-rate-risk hedging transactions. They are also granted to companies or public-sector entities so that they can hedge typically against exchange-rate and interest-rate risk.

These limits are granted according to the lending process and lending authority described in Section 4.1. They are monitored daily on an individual basis.

In principle, the Bank handles OTC derivative transactions only on the basis of ISDA netting agreements or an equivalent agreement. For its main bank counterparties in terms of pre-settlement exposure, the Bank takes the necessary measures to ensure that OTC derivative transactions can be carried out in accordance with a credit support annex (CSA) for collateral management. Alternatively, blocked cash deposits can be set up as a risk mitigant for OTC derivative exposure.

Credit-risk exposure is measured according to the principle of "positive mark-to-market value plus add-on." The add-on is determined by type of underlying and by maturity, on the basis of internal models. Where the Bank has entered into an ISDA netting agreement with the counterparty, contracts with negative mark-to-market values can be taken into account to reduce credit-risk exposure. Where the Bank has entered into a CSA collateral management agreement with the counterparty, credit-risk exposure is determined according to the same principle, taking into account the amount of the cash collateral and based on a reduced add-on, in order to take into consideration the frequency of revaluation and the option to make margin calls.

When calculating capital requirements, exposure is determined according to the current exposure method (Basel II Accord, Annex IV, figures 91ff), taking account of regulatory add-ons as well as netting and collateral management agreements. Capital requirements are determined according to the

appropriate approach (IRB or SA-BIS), which since 1 January 2013 includes the credit valuation

Table 19. IRB – CCR exposure by portfolio and PD range
In CHF millions, at 31 December 2018, BCV Group, (CCR4) ¹⁵

adjustment (CVA).

		а	b	С	d	е	f	g
				Number				
		EAD post-		of	Average	Average		RWA
	PD range	CRM	Average PD	obligors	LGD	maturity	RWA	density
3	Banks and secur	rities firms (F	-IRB)					
	0.00 to <0.15	544	0.21%	61	45%	0.52	65	12%
	0.15 to <0.25	24	0.25%	7	45%	1.81	13	55%
	0.25 to <0.50	0	0.37%	1	45%	1.00	0	62%
	0.50 to <0.75	-	-	-	-	-	-	-
	0.75 to <2.50	-	-	-	-	-	-	-
	2.50 to <10.00	-	-	-	-	-	-	_
	10.00 to <100.00	-	-	-	-	-	-	
	100.00 (default)	-	-	-	-	-	-	-
	Sub-total	568	0.21%	69	45%	0.57	78	14%
	Total	594	0.23%	242	45%	0.60	89	15%

Table 20. Standardized Approach – CCR exposure by regulatory portfolio and risk weight In CHF millions, at 31 December 2018, BCV Group, (CCR3)

		а	b	С	d	е	f	g	h	i
	_								F	Risk weight
	Category	0%	10%	20%	50%	75%	100%	150%	Other	Total credit exposure
1	Central governments and central banks	31	-	-	-	-	-	-	-	31
2	Banks and securities firms	-	-	8	11	-	-	-	-	19
3	Non-central govt. public-sector entities; multilateral development banks	-	-	-	-	-	-	-	-	-
4	Corporates	-	-	-	-	-	19	0	-	19
5	Retail	-	-	-	-	0	1	0	-	1
6	Equity	-	-	-	-	-	-	-	-	-
7	Other assets	-	-	-	-	-	-	-	-	-
9	Total	31	-	8	11	0	20	0	-	71

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¹⁵The following portfolios are not shown in the table because they do not have a material amount of RWA: "Noncentral government public-sector entities; multilateral development banks;" "Other retail exposure" (RWA < CHF 1m); and "Corporates – other lending" (RWA = CHF 9m).

Counterparty-credit-risk exposure determined using the Standardized Approach consists of derivative positions and repo agreements with supranational institutions, insurance companies and investment funds.

Table 21. Composition of collateral for CCR exposure

In CHF millions, at 31 December 2018, BCV Group, (CCR5)¹⁶

		а	b	С	d	е	f
		Collater	al used in de	rivative trans	actions		
		Fair value	of collateral	ue of posted	Collate	ral used in	
			received collateral				SFTs
						Fair	Fair
	Time of colleteral	Campanatad	Non-	Commonated	Non-		value of posted
	Type of collateral		segregated		segregated	received	collateral
1	Cash in CHF	25	-	9	-	50	-
2	Cash in other currencies	54	-	113	-	1,807	381
3	Swiss sovereign debt	-	-	13	-	7	196
4	Other sovereign debt	-	-	-	23	74	121
5	Government agency debt	-	-	67	6	69	1,383
6	Corporate bonds	-	-	32	-	206	397
7	Equity securities	-	-	-	-	2	-
8	Other collateral	-	-	-	-	-	-
9	Total	80	-	234	28	2,215	2,478

¹⁶This table includes collateral received and posted for securities financing transactions (SFTs) and derivative transactions. It does not include collateral posted to central banks and other institutions that form part of the financial market infrastructure for the purposes of securing credit lines and payment and settlement transactions.

Centrally cleared derivatives

Centrally cleared derivatives include exchange-traded derivatives (ETDs) and OTC derivatives cleared by a central counterparty.

Exchange-traded derivatives whose settlement is guaranteed by a central counterparty (see Table 22, row 4) mainly relate to transactions on behalf of clients (investment funds, banks, companies, and individuals). Nostro positions make up a small portion of the total exposure to central counterparties. The contracts traded are mainly options and futures on equities and major indexes. The major organized markets are Eurex, the Chicago Mercantile Exchange, and LIFFE.

OTC derivatives cleared by a central counterparty are interest-rate swaps used to manage the Bank's interest-rate risk and cleared by Eurex (see Table 22, row 3).

The Bank's exposure to central counterparties results from derivative positions, initial margins, variation margins, and default fund contributions. For derivatives, the exposure is determined based on the positive mark-to-market value plus an add-on; other exposures are determined using market values. This type of exposure is subject to a credit limit if it gives rise to credit risk for the Bank.

Capital requirements for these positions have been calculated since Basel III came into force on 1 January 2013.

Table 22. Exposure to central counterparties (CCPs) In CHF millions, at 31 December 2018, BCV Group, (CCR8)

		a	b
		EAD post-CRM	RWA
1	Total exposure to qualified central counterparties (QCCPs)		31
2	Exposure for trades at QCCPs (excl. initial margin and default fund contributions)	54	27
3	Of which: OTC derivatives	12	0
4	Of which: exchange-traded derivatives	42	27
7	Segregated initial margin	109	
8	Non-segregated initial margin	25	2
9	Pre-funded default fund contributions	7	2

MARKET RISK

5.

5.1 Market risk in the trading book

Strategy and process

All trading activities are managed within the Asset Management & Trading Division. A distinction is made between the trading portfolio, which includes all the trading teams' positions, and the financial management nostro portfolio, which is composed of the nostro positions managed by the Asset Management Department.

The Trading Department carries out market transactions in equities, fixed-income instruments, forex, and precious metals on behalf of internal and external counterparties. It has also acquired expertise in structured products. The Trading Department is active along the entire structured product value chain, from issuing to market-making. Since BCV completely withdrew from proprietary equity-derivative trading at the end of 2009, the Trading Department has focused primarily on customer-driven transactions.

The Asset Management Department is responsible for the financial management nostro portfolio. While this portfolio used to focus on providing a return, it was given a new role under the Bank's strategy and significantly reduced in 2009 and early 2010. It is now used to assist in the creation of new Asset Management funds, while keeping risk-taking to a minimum. This portfolio may be invested in stocks, bonds, simple derivatives, structured products, funds, and funds of funds. All of these positions (apart from those in funds and funds of funds) are on recognized exchanges or representative markets.

Structure and organization

All new Asset Management & Trading products and instruments must be approved by the Division's Product and Instrument Committee (PIC). This committee is chaired by the Executive Board member in charge of the Asset Management & Trading Division and includes the Division's department heads, the head of the Risk Management Department (right of veto), and the head of the Back Office Department (right of veto). The process ensures that before a product is launched, all requirements have been met in the areas of risk management, ALM, treasury management, back offices, legal, compliance, tax, and IT.

For all trading positions, the overnight monitoring of market risk is under the responsibility of the Market Risk Unit within the Risk Management Department. The Market Risk Unit also defines the risk control measures and monitors the appropriateness of risk control for new trading products.

Risk assessment

Various techniques are used to measure risk exposure on the Asset Management & Trading Division's trading portfolio:

- Historical overnight Value-at-Risk (VaR) with a one-day time horizon and a confidence level of 99%;
- · Analysis of potential losses using static stress tests;
- Sensitivity metrics such as delta, gamma, vega, theta, and rho.

Limit utilization is controlled and reported daily by the Market Risk Unit.

Various techniques are used to measure risk in the Asset Management & Trading Division's financial management nostro portfolio:

- Historical VaR with a six-month time horizon and a confidence level of 99%;
- Analysis of potential losses using static stress tests and dynamic six-month stress tests.

Market-risk-weighted assets correspond to the minimum capital requirements multiplied by 12.5. Minimum capital requirements for market risk on BCV's trading book are determined based on market values (mark-to-market) and in accordance with the Standardized Approach (CAO, Article 84) without the use of in-house models. For options trading, the calculation is based on the delta-plus method: the market value of the underlying is multiplied by the delta for the options positions. This method also takes gamma and vega into account. Hedge-fund positions in the financial management nostro portfolio are not included in the capital-requirement calculations for the trading book. Instead, these positions are included in the Bank's financial investment portfolio and treated as equity securities.

Assets weighted for interest-rate risk accounted for the largest portion of risk-weighted assets at 31 December 2018. Of these assets, a significant portion was made up of currency swaps for customer-driven forex trading and bond positions. Assets weighted for equity risk result from remaining positions held as part of the Bank's structured products business and, to a lesser extent, from nostro positions managed by the Asset Management Department.

Table 23. Market risk under the Standardized Approach (SA) In CHF millions, BCV Group, (MR1)

	a	a-1
	RWA	
	31/12/2018	30/6/2018
right products	172	247
Interest-rate risk (general and specific)	133	148
Equity risk (general and specific)	29	45
Foreign-exchange risk	9	54
Commodity risk	-	-
ions	6	9
Simplified approach	-	-
Delta-plus method	6	9
Scenario approach	-	-
Securitization	-	-
Total	178	257
	Equity risk (general and specific) Foreign-exchange risk Commodity risk ions Simplified approach Delta-plus method Scenario approach Securitization	RWA 31/12/2018 right products 172 Interest-rate risk (general and specific) 133 Equity risk (general and specific) 29 Foreign-exchange risk 9 Commodity risk - ions 6 Simplified approach - Delta-plus method 6 Scenario approach - Securitization -

5.2 Risk on equity securities in the banking book

Equity securities in the banking book are recorded on the balance sheet in the line items Financial investments and Non-consolidated holdings.

Strategy and processes

Financial investments are composed of strategic holdings with a long time horizon that are acquired in accordance with the Bank's strategy. The Bank defined an upper limit of CHF 200m for these equity securities and, in principle, does not invest directly in private-equity positions.

The authority to acquire and change long-term holdings is held by the Executive Board for holdings of up to CHF 20m and the Board of Directors for larger amounts. The Board of Directors has responsibility for setting up and selling subsidiaries.

Risk assessment

Equity securities included in Financial investments are mainly listed or unlisted shares and fund units that are not held for trading purposes or for long-term investment. They are valued at lower of cost or market.

The "Non-consolidated holdings" line item comprises corporate equity securities, which are held as long-term investments irrespective of voting rights. It also includes the Group's infrastructure-related holdings, particularly joint ventures. They are stated at cost, less any required impairment. The Group's main non-consolidated holdings at 31 December 2018 were investments in financial companies (a 13.6% stake in the Swiss Central Mortgage-Bond Institution, a 4.8% stake in Aduno, a 3.2% stake in TWINT, and a 2.5% stake in SIX).

Capital requirements are determined for both equity securities recorded under Financial investments and those entered under Non-consolidated holdings. A 250% risk weighting is applied to shareholdings of more than 10% in financial companies (below threshold 3 under Article 40 of the CAO), while the simple risk-weight method is applied to all other equity securities included in Financial investments and Non-consolidated holdings.

Table 24. IRB – Equities under the simple risk-weight method In CHF millions, at 31 December 2018, BCV Group, (CR10)¹⁷

Regulatory category	RW	Exposure amount	RWA
Exchange-traded equity exposure	300%	10	31
Other equity exposure	400%	24	101
Total		33	132

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¹⁷Table CR10 in the Basel Accord covers specialized lending and equities under the simple risk-weight method. In this report, equities are covered in this table while specialized lending is covered in Table 16 (in Section 4.2.3.2, "Slotting approach for specialized lending").

5.3 Interest-rate risk in the banking book

5.3.1 Management of interest-rate risk in the banking book

Interest-rate risk in the banking book (IRRBB) is defined here as the potential loss in the Bank's net interest income (NII) or economic value of equity (EVE) arising from the effects that an adverse change in interest rates could have on the Bank's banking-book positions (on- and off-balance sheet).

The main IRRBB risk factors for the Bank are:

- Instantaneous and progressive changes in the yield curve;
- Changes in customer behavior, including customer allocation among different financial instruments.

The Bank's IRRBB exposure is of three types:

- Gap risk Mismatches within the term structure of banking-book positions (i.e., among volumes and repricing maturities) for the assets, liabilities, and off-balance-sheet positions in the Bank's banking book;
- Behavioral option risk Positions, especially non-maturity deposits, that could be affected by competitive pricing practices or changes in customer behavior;
- Basis risk The risk arising from an imperfect correlation in the adjustment of rates earned and paid on different instruments with otherwise similar rate-change characteristics.

Strategy and processes

The Board of Directors establishes the Bank's principles for managing risk and decides on the risk-taking strategy it will pursue, which includes the target profile for IRRBB. This target profile is defined in the Bank's Financial Strategy and reviewed annually as part of its Financial Management Policy (FMP). The target profile is defined within limits that are expressed in the form of equity duration. Those limits are approved by the Board of Directors.

Structure and organization

The Executive Board is responsible for organizing and implementing IRRBB management. The Executive Board delegates management of this type of risk to its Asset and Liability Management Committee (ALCO). This committee meets monthly. It is chaired by the CEO and comprises four other Executive Board members, including the CFO.

In the Finance & Risks Division, IRRBB management is centralized within the ALM & Financial Management (ALM-FM) Department, which reports directly to the CFO. This department is responsible for:

- Defining and maintaining the models and principles used to manage IRRBB as part of the Bank's Financial Strategy. These models and principles are approved by the Model Validation team, the Executive Board's Risk Management Committee, and the Board of Directors.
- Producing monthly reports on IRRBB management and presenting them to the ALCO. This report
 is also presented to the Executive Board and the Board of Directors each quarter.

Risk assessment

The ALM-FM Department continuously manages interest-rate risk for the parent company's entire banking book, and, at each month-end, calculates the sensitivity indicators for its equity capital. Interest-rate risk in the trading book represents a market risk and is outside the scope of IRRBB.

Interest-rate risk relating to the activities of Piguet Galland & Cie SA is managed independently by its Executive Board under the supervision of BCV Group. Each quarter, the interest-rate position for the entire Group is determined by the ALM-FM Department, in accordance with the approach used by the parent company. It is then presented to the ALCO, the Executive Board, and the Board of Directors. At 31 December 2018, in terms of sensitivity, the parent company's IRRBB accounted for 98% of the Group's IRRBB exposure.

Risk measurement

The Bank measures and monitors IRRBB using two types of indicators:

- Static indicators, which measure the sensitivity of the net present value of the banking book:
 - The present value of equity;
 - The sensitivity of the economic value of equity to a 100bp change in interest rates;
 - The duration of equity;
 - The VaR of the net present value of equity;
 - Key rate durations;
 - o Future changes in the value and duration of equity.
- Dynamic indicators, which are based on interest-rate and balance-sheet scenarios for the current year and subsequent two years. The results of these simulations are used to calculate NII forecasts and the NII at risk over rolling 12-, 24-, and 36-month periods. The NII at risk is a measure of the sensitivity of NII to fluctuations in interest rates.

Scenarios

IRRBB is measured using standard scenarios that combine an interest-rate scenario with a balance-sheet simulation that considers the impact of new business production in order to incorporate assumptions about customer behavior. The projected interest rates are calculated at various confidence intervals so as to cover a wide range of possible interest-rate movements; these confidence intervals are based on historical interest-rate data dating back to 1988. The interest-rate scenarios that the Bank uses are:

- Spike scenario: A spike in interest rates, with a 99% confidence interval;
- Probable scenario: The most likely movements in interest rates over the next three years, according to expert estimates. The Bank also generates Probable+ and Probable- scenarios at 66% confidence intervals around the Probable scenario;
- Crash scenario: A sharp decrease in interest rates, with a 99% confidence interval;
- Inversion scenario: An inversion of the yield curve based on expert estimates.

To measure its ability to withstand extreme changes in interest rates, the Bank also conducts ad-hoc stress tests in response to market conditions. In addition, the ALM-FM Department conducts stress tests every six months using the stress scenarios specified in the Swiss National Bank's Financial Stability Report.

Risk mitigation

IRRBB hedging decisions are made by the ALCO and executed on the market by the ALM-FM Department's Treasury team. Interest-rate swaps are currently the only type of hedging instrument used. Options positions in the banking book are systematically hedged through market transactions.

All hedging instruments must be matched to a fixed-rate position in the banking book; these hedges are recognized under accrual accounting.

Every quarter, the ALM-FM Department tests the effectiveness of the hedges by making sure that the hedge ratio is high enough for the associated derivatives to be classified as hedging instruments.

Table 25. Interest-rate risk – Quantitative information on the structure of positions, and maturity repricing At 31 December 2018, parent company, (IRRBBA1)¹⁸

		а	b	С	d	<u>e</u>	f	g
	_	V	olume in CHF	millions	re	verage pricing urity (in years)		icing maturity (in I to non-maturity positions
		Total	Of which CHF	Of which other currencies	Total	Of which CHF	Total	Of which CHF
Positions	Due from banks	951	205	-	0.3	0.3		
with a set repricing	Loans and advances to customers	4,807	3,839	-	2.9	3.4		
maturity	Money-market mortgage loans	-	-	-	-	-		
	Fixed-rate mortgage loans	24,559	24,559	-	3.8	3.8		
	Financial investments	3,678	3,010	-	4.4	4.2		
	Other assets	-	-	-	-	-		
	Receivables on interest- rate derivatives	8,925	5,571	-	1.5	2.4		
	Due to banks	-2,676	-550	-	0.1	0.0		
	Customer deposits	-1,427	-689	-	0.4	0.7		
	Medium-term notes	-7	-7	-	1.4	1.4		
	Bonds and mortgage- backed bonds	-6,569	-6,569	-	7.3	7.3		
	Other liabilities	-883	-723	-	0.6	0.6		
	Liabilities on interest-rate derivatives	-8,928	-7,946	-	2.0	1.8		

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¹⁸As the Bank's swap positions (interest-rate and FX swaps) have two legs – a receivables leg and a payables leg – they are recorded under both "Receivables on interest-rate derivatives" and "Liabilities on interest-rate derivatives." Column c ("Of which other currencies") gives positions in other currencies that account for over 10% of balance-sheet assets or liabilities.

		а	b	C	d	<u>e</u>	f	g
		,	Volume in CF	IF millions	re	verage pricing irity (in years)		icing maturity (in d to non-maturity positions
			Of which	Of which other		Of which		
		Total	CHF	currencies	Total	CHF	Total	Of which CHF
Positions	Due from banks	1,061	89	-	0.0	0.0	-	-
with no set repricing	Loans and advances to customers	1,401	269	-	0.3	1.0	7.0	7.0
maturity	Variable-rate mortgage loans	196	196	-	2.7	2.7	10.0	10.0
	Other sight receivables	9,807	9,263	-	0.0	0.0	-	-
	Customer sight deposits	-19,449	-16,971	-	1.4	1.5	7.0	7.0
	Other sight liabilities	-2,737	-929	-	0.0	0.0	-	-
	Callable but non- transferrable customer savings deposits	-9,546	-9,456	-	1.8	1.8	5.0	5.0
	Total	3,161	3,161	-	8.3	8.7	-	-

5.3.2 Prescribed modeling and parametric assumptions used to calculate the values in Table IRRBB1

The values given in Table IRRBB1 (Table 26) have been calculated in accordance with FINMA Circular 2016/1, "Disclosure – banks." The six interest-rate scenarios used are those given in FINMA Circular 2019/2, "Interest-rate risk – banks." The following sections describe the key modeling and parametric assumptions used to calculate changes in the economic value of equity (Δ EVE) and changes in net interest income (Δ NII) as per regulatory requirements.

Calculation of ∆EVE

Cash flows from fixed-rate positions are calculated using the interest rates on these positions. These calculations are aggregated by month using a median date in order to keep the calculation effort manageable.

The Bank includes non-maturity exposures in its calculation of static indicators using replication models. The main features of these models are:

- A parameter designed to smooth out the monthly volatility inherent in these types of exposures. This parameter is calculated using the monthly volume above the 3-month or 12-month rolling average (depending on the type of exposure). It is updated at one-month intervals.
- A simulation of the core stable volume of exposures, which is done using an interest-rate replication model for the rates applied to customers.
- This interest-rate replication model is based on market interest rates with repricing maturities spanning from one month to ten years (the average and the longest repricing maturities are given in Table IRRBBA1).
- The models are calibrated every year using a 10-year calculation window. Periods when a zero interest rate is applied to customers are omitted.

The interest rates used to discount the cash flows for the calculation of EVE are the Libor up to 12 months and the mid-swap rate beyond 12 months. This holds true for all currencies.

Intermediate interest rates are calculated using linear interpolation.

Calculation of ANII

To model the repricing of fixed-rate exposures, which are reset at a range of different maturities, the Bank uses historical data based on customer choices over the previous three months to determine what percentage of the total repriced amount to allocate to each maturity.

Cash flows from new fixed-rate positions are calculated using the interest rates on the new positions as follows:

Market interest rate for the term of the position + Additional funding rate + Expected margin

Where:

- Market interest rate = Taken from the simulated rate curve (Libor and mid-swap rate)
- Additional funding rate = The spread at each maturity that the Bank must pay above the Libor or mid-swap rate
- Expected margin = Based on recent and projected trends, taking into account business objectives and competitive pressure

For exposures with variable rates set by the Bank (mainly sight deposits and savings accounts), the interest rates are modeled using historical data that compare market rates to customer rates. These historical data are used in stress tests to determine the interest rate that would be applied to customers after an interest-rate shock.

Behavioral and automatic option risks

Customers who pay a loan off early are charged an early redemption fee, which is calculated by multiplying the outstanding amount on the loan by an interest rate equal to the difference between the rate on the loan and the Bank's replacement rate for the remaining term of the loan. This policy ensures that that Bank does not incur any losses when customers pay off their loans early. As a result, the Bank does not use any specific models for early repayments.

The Bank applies the same policy to early withdrawals on term deposits, meaning the Bank does not use any specific models for these deposits either.

The Bank currently has no on- or off-balance-sheet positions that include embedded automatic options such as loans with a cap or floor, interest-rate options, and swaptions.

Any instruments on the balance sheet that include embedded automatic options would be accounted for as delta-weighted positions.

Foreign currencies

The vast majority of positions on the Bank's balance sheet are in CHF. The main foreign currencies are EUR and USD, which accounted for 6.0% and 6.3% of balance-sheet positions, respectively, at 31 December 2018. All foreign-currency exposures are fully included in the calculation of static indicators (as are CHF exposures), but are accounted for on an aggregate basis in the calculation of NII indicators. In 2018, the NII from foreign currencies amounted to 5% of total NII. The Δ NII from foreign currencies under different interest-rate scenarios is negligible relative to the Δ NII from CHF positions.

Differences in the assumptions used to calculate indicators

The main differences in the assumptions used to calculate the Bank's internal indicators vs. those used to calculate the indicators given in Table IRRBB1 are as follows:

- The NII values in Table IRRBB1 are calculated using a constant balance sheet, but internal
 indicators are calculated using a range of different balance-sheet scenarios based on different
 interest rates. This enables the Bank to account for how customer behavior may change in
 response to higher or lower interest rates;
- The NII values in Table IRRBB1 are calculated to reflect the effects of an instantaneous interestrate shock, while internal indicators are calculated assuming the upwards or downwards pressure on interest rates occurs linearly over the first six months of the simulation;
- The NII values in Table IRRBB1 are calculated for a rolling 12-month period, while internal NII
 indicators are calculated for the current year and the subsequent two years.

Table 26. Interest-rate risk – Quantitative information on the economic value of equity and net interest income

In CHF millions, at 31 December 2018, parent company, (IRRBB1)

	a	b	С	<u> </u>	
	ΔΕVΕ		ΔΝΙΙ		
	31/12/2018	30/6/2018	31/12/2018	30/6/2018	
Parallel up	-549	-551	-5	-14	
Parallel down	612	612	-15	-6	
Steepener	-227	-216			
Flattener	116	104			
Short rate up	-94	-104			
Short rate down	97	108			
Maximum	-549	-551	-15	-14	
	31/12/201	18	30/6/201	8	
Tier 1 capital	3,034		2,977		

The economic value of equity is sensitive to a rise in interest rates; this sensitivity was largely unchanged in the second half of 2018.

The Δ NII was low in both the "parallel up" and "parallel down" scenarios, with the maximum possible loss roughly the same at 30 June and 31 December 2018. However, one difference relative to 30 June is that at 31 December the "parallel down" scenario was the worse scenario. This is due to the increase in short-term cash holdings on the balance sheet, which would reduce NII if interest rates went down and increase it if interest rates went up.

5.4 Liquidity risk

Strategy and processes

The Board of Directors sets out the principles for managing liquidity risk and the target liquidity-risk profile. The liquidity-risk profile is expressed through metrics such as the liquidity coverage ratio (LCR) and other indicators used to analyze the balance sheet's structure. The target liquidity-risk profile is reviewed annually by the ALCO.

Structure and organization

The Executive Board delegates responsibility for managing liquidity risk to the ALCO, which does so in accordance with the principles set out by the Board of Directors. Every month, the ALCO monitors liquidity risk via the monthly ALCO report. The reports are also submitted to the Executive Board and the Board of Directors every quarter.

Within the Finance & Risks Division, the ALM-FM Department, which includes ALM and Treasury, is responsible for the centralized and operational management of liquidity risk.

- Treasury manages the parent company's liquidity position on a daily basis and ensures that
 the internal LCR limit is complied with. Treasury is also the counterparty for Group
 subsidiaries when managing their liquidity positions.
- ALM submits proposals to the ALCO concerning strategic balance-sheet management (e.g., long-term borrowings and financial investments) and draws up the ALCO reports.
- ALM is also in charge of determining and maintaining liquidity-risk management principles and models. The principles are approved by the ALCO and the Board of Directors, while models are approved by the EBRMC.

Risk assessment

There are two types of liquidity-risk metrics:

- Static metrics, which calculate the risk on a given date in order to assess the risk level instantaneously and monitor changes over time;
- Dynamic metrics, which calculate the risk on future dates in order to anticipate changes in the
 risk level. Dynamic metrics are determined by simulating changes in balance-sheet items over
 the following three years using three different scenarios of how the Bank's business could
 develop.

The following metrics are calculated both statically and dynamically and analyzed by the ALCO in order to assess the Bank's liquidity position and the robustness of its balance sheet:

- Basel III liquidity ratios (LCR and NSFR);
- The net funding requirements of the Bank's business lines;
- The long-term funding plan.

Other static indicators are also monitored by the ALCO:

- Maturities distribution/concentration for long-term borrowings;
- Funding costs on the interbank and bond markets.

In addition to these risk metrics, stress tests are conducted to quantify the impact that different adverse scenarios would have on the Bank's liquidity position over a given time. These stress tests are the starting point for determining the target liquidity-risk profile.

Funding structure

BCV is funded primarily by client deposits. These account for 66% of total liabilities and shareholders' equity and come in the form of savings, sight deposits, term deposits, and medium-term notes.

Long-term borrowings account for 15% of total liabilities and shareholders' equity. Most long-term borrowings are mortgage-backed bonds issued through the Central Mortgage-Bond Institution, which represents a stable source of long-term funding. Other long-term borrowings (e.g., structured products and bonds) are made for diversification purposes.

Unsecured amounts due to banks make up 6% of total liabilities and shareholders' equity. Secured amounts due to banks (i.e., repurchase agreements) account for 4%.

The remaining items are shareholders' equity (7%) and other liabilities (3%).

Contingency funding plan

Pursuant to Article 10 of the Swiss Federal Liquidity Ordinance, the Bank has a contingency funding plan in place to cover a potential liquidity shortage. The plan has three components:

- An early warning system that determines the risk level using specific and systemic risk indicators:
- Escalation rules stipulating the management level that must be informed depending on how the situation develops;
- Checklists setting out the procedure to be followed, the measures to be taken by each business line, and the responsibilities of those tasked with managing the liquidity shortage.

The contingency funding plan is reviewed annually by the ALCO.

Liquidity coverage ratio (LCR)

The LCR is an international regulatory standard set out in the Basel III Accord. It became mandatory on 1 January 2015. The LCR ensures that a bank has enough liquidity to withstand a 30-calendar-day liquidity stress scenario. It is the ratio between the amount of high-quality liquid assets (HQLA) available and potential net cash outflows over a 30-day period. The term net cash outflows is defined as the total potential cash outflows (such as withdrawals from sight deposits and non-renewals of borrowings with a maturity of less than 30 days) less the total potential cash inflows (such as the repayment of receivables with a maturity of less than 30 days) in a stress situation. For banks that, like BCV, are not systemically important, the minimum requirement for the LCR is 90% for 2018 and will be raised to 100% for 2019.

The average LCR for all BCV Group currencies was 112% in Q3 2018 and 113% in Q4 2018.

The Bank's SIC account makes up 65% of its HQLA. The remaining HQLA are primarily Swiss-issued securities that have a credit rating of between AAA and AA- (Central Mortgage-Bond Institution, the Mortgage-Bond Bank, the Swiss Federal Government and cantonal governments) and that are eligible as collateral for SNB open-market transactions.

Withdrawals from retail and corporate client deposits account for around 89% of total potential cash outflows. This reflects the fact that client deposits are the Bank's primary source of funding and also therefore the primary source of potential fund outflows in the event of a liquidity run.

Other cash outflows relate mainly to:

- Derivatives maturing within 30 days and margin calls relating to credit support annexes;
- The undrawn part of credit facilities granted to clients;

• Contingent liabilities (e.g., guarantees and letters of credit).

Loans to clients and banks maturing within 30 days account for around 96% of potential cash inflows. The remaining cash inflows primarily come from derivatives maturing within 30 days.

The LCR in CHF is higher than the LCR for all currencies combined, as almost all HQLA are denominated in CHF (cash deposited at the SNB). Conversely, the LCR in EUR and USD is lower than the LCR for all currencies combined.

Table 27. Liquidity coverage ratio (LCR) In CHF millions, BCV Group, (LIQ1)

			Q4 2018		Q3 2018
		Total	Total	Total	Total
		unweighted		unweighted	weighted
		value	value	value	value
	h-Quality Liquid Assets (HQLA)				
1	Total HQLA		8,628		8,403
	sh outflows				
2	Retail deposits	20,049	1,834	19,882	1,816
3	Of which: stable deposits	5,956	298	5,956	298
4	Of which: less-stable deposits	14,093	1,536	13,925	1,519
5	Unsecured wholesale funding	12,536	6,565	11,804	5,953
6	Of which: operational deposits (all	1,692	423	1,618	404
	counterparties) and deposits in				
	networks of cooperative banks				
7	Of which: non-operational deposits	10,749	6,047	10,115	5,478
	(all counterparties)	0.5	0.5	74	74
8	Of which: unsecured debt	95	95	71	71
9	Secured wholesale funding	0.010	262		215
10	Additional requirements	2,240	586	2,203	625
11	Of which: cash outflows related to	602	224	531	239
	derivative exposure and other				
13	collateral requirements Of which: cash outflows related to	1 627	362	1 672	386
13	confirmed credit and liquidity	1,637	302	1,672	300
	facilities				
14	Other contractual funding obligations	35	22	16	12
15	Other contingent funding obligations	2,843	142	2,762	138
16	Total cash outflows	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	9,411	, -	8,760
Cas	sh inflows		- ,		
17	Secured lending (e.g., reverse repos)	-	_	-	
18	Inflows from fully performing exposure	2,152	1,698	1,592	1,208
19	Other cash inflows	47	47	55	55
20	Total cash inflows	2,199	1,745	1,647	1,263
Adi	usted values	· · · · · · · · · · · · · · · · · · ·	,		
21	Total HQLA		8,628		8,403
22	Total net cash outflows		7,666		7,497
23	Liquidity coverage ratio		113%		112%
	. ,				

6. OPERATIONAL RISK

Strategy and processes

Exposure to operational risks results from the Bank carrying out its activities and is not actively sought after.

The aim of operational-risk management is to mitigate operational-risk factors by identifying areas of improvement, and strengthening the Bank's operational and management control system. In particular, the Bank aims to reduce its exposure to:

- The erroneous or malicious behavior of employees, suppliers, bank counterparties, customers, or other parties external to the Bank;
- Inadequate IT systems (applications, interfaces, and hardware) or communication systems (telephone, fax, email, social media, etc.);
- Inadequate infrastructure;
- Inadequate organization in terms of the conceptual framework (methods, processes, corporate structure, etc.) or the organizational framework (rules, policies, directives, and manuals);
- External factors, such as the risks of natural disasters, pandemic, and social unrest.

Structure and organization

The Operational Risk Unit within the Finance & Risks Division's Risk Management Department is in charge of conducting periodic analyses to monitor the Bank's operational-risk profile (general self-assessments or specific analyses) and gathering and analyzing information on operational incidents that have occurred. This unit develops the methods used for managing operational risk and submits them for approval to the Executive Board's Risk Management Committee. The unit is also responsible for implementing these methods. In addition, the Operational Risk Unit contributes to creating and implementing assessment methods and tools for the Bank's internal control system.

Operational risk reviews and analysis of operational incidents

Periodic reviews are carried out in order to anticipate the main operational risks. These reviews are supplemented by ad-hoc analyses if new threats arise, if FINMA submits a specific request or if a major risk event occurs in another bank. The aim of these reviews is to reveal possible improvements to operational and managerial controls.

In addition to anticipating risks, the Bank exhaustively and systematically gathers information on and analyzes the main operational incidents arising from the Bank's activities. These incidents are recorded in a dedicated operational-risk-management system and analyzed on a monthly basis in order to improve internal controls. Whenever possible, the Bank manages major operational incidents according to pre-defined action plans.

The Risk Management Department forms part of the level 2 oversight of the internal control system. As such, the Department conducts regular reviews of how operational risks are detected, the measures in place for mitigating operational risks, and the related controls. These reviews are conducted as part of the annual review of main risks and of the internal control system.

Since the Basel II Accord came into force, the Bank has determined its regulatory capital requirements for operational risk in accordance with the Standardized Approach (CAO, Article 93). Under this approach, the Bank allocates income to the eight risk segments set forth by the regulator.

Internal control system (ICS)

The Bank's internal control system (ICS) was developed in accordance with the recommendations of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the Basel Committee, and pursuant to FINMA Circulars 2017/1 and 2008/21 and Swiss auditing standard No. 890.

The ICS is an integrated bank-wide system covering all functions and all hierarchical levels. In addition to the Bank's front-line activities, the system also applies to business-support, steering, and monitoring functions as well as to external service providers, particularly those falling under the scope of FINMA Circular 2018/3 on outsourcing.

BCV works continually to foster a culture of oversight among its staff so that each employee understands his or her role in the ICS. Oversight is thus part of employee performance assessment and skills development.

In accordance with the disclosure and reporting requirements set forth in FINMA Circular 2017/1, the Bank carries out a review at least annually of key risks and controls, with a particular focus on operational risks related to execution. The Bank keeps detailed records of these risks and controls for each department and identifies the main areas of potential improvement.

Each year, following the review, the Bank assesses its operational ICS and submits a report to the governing bodies. It also submits an annual assessment of its ICS for the financial accounts in order to meet the requirements of Swiss auditing standard No. 890.

7. APPENDIX

Table 28. Key metrics

In CHF millions, BCV Group, full table, (KM1)

		а	С	е
		31/12/2018	30/6/2018	31/12/2017
Ava	ilable capital			_
1	Common Equity Tier 1 (CET1)	3,156	3,109	3,118
2	Tier 1 (T1)	3,156	3,109	3,118
3	Total capital	3,177	3,132	3,140
Ris	k-weighted assets (RWA)			,
4	Total RWA	18,423	18,949	18,199
4a	Minimum capital requirement	1,474	1,516	1,456
Risl	k-based capital ratios as % of RWA			_
5	CET1 ratio	17.1%	16.4%	17.1%
6	Tier 1 ratio	17.1%	16.4%	17.1%
7	Total capital ratio	17.2%	16.5%	17.3%
Add	litional CET1 buffer requirements (Basel (Committee) as % of	RWA	
8	Capital conservation buffer	1.9%	1.9%	1.3%
	requirement (2.5% from 2019)			
9	Countercyclical buffer requirement	-	-	-
11	Total of bank CET1 specific buffer	1.9%	1.9%	1.3%
-10	requirements	2.00/	0.50/	2.22/
12	CET1 available after meeting the	9.2%	8.5%	9.3%
	bank's minimum capital requirements (i.e., after the CET1 allocated to cover			
	minimum capital requirements and any			
	TLAC requirements)			
FIN	MA capital ratio requirements			
12a	CET1 buffer (CAO, Annex 8)	4.0%	4.0%	4.0%
12b	Countercyclical buffer (CAO, Art. 44	0.8%	0.7%	0.7%
	and 44a)			
12c	CET1 total requirement in accordance		8.5%	8.5%
	with Annex 8 of the CAO plus the			
	countercyclical buffer (CAO, Art. 44 and 44a)			
12d	Tier 1 total requirement in accordance	10.4%	10.3%	10.3%
	with Annex 8 of the CAO plus the	, .	. 0.0 / 0	10.070
	countercyclical buffer (CAO, Art. 44			
	and 44a)			
12e	Total regulatory capital requirement in	12.8%	12.7%	12.7%
	accordance with Annex 8 of the CAO			
	plus the countercyclical buffer (CAO, Art. 44 and 44a)			
Bas	el III leverage ratio			
13	Total Basel III leverage ratio exposure	50,651	48,296	47,886
	measure	30,001	.0,200	,000
14	Basel III leverage ratio (Tier 1 capital	6.2%	6.4%	6.5%
	as % of total Basel III leverage ratio			
	exposure measure)			

d а С Q4 2018 Q3 2018 Q2 2018 Q1 2018 Q4 2017 Liquidity coverage ratio (LCR) 15 Total high-quality liquid 8,628 8,403 8,789 8,654 9,087 assets (HQLA) 16 Total net cash outflow 7.666 7.497 7.599 7.344 7.390 118% 17 LCR 113% 112% 123% 116%

7.1 Reconciliation of financial statements and regulatory exposure

Table 29. Reconciliation of regulatory capital to balance sheet

In CHF millions, BCV Group, (CC2)¹⁹

a-1 С Balance sheet as in published financial statements Reference 31/12/2018 30/6/2018 **Assets** Cash and cash equivalents 8.235 7.383 Due from banks 1,921 1,414 Reverse repurchase agreements 314 321 5,404 Loans and advances to customers 5,677 Mortgage loans 26,079 25,707 Trading portfolio assets 334 232 Positive mark-to-market values of 268 299 derivative financial instruments Other financial assets at fair value 621 705 Financial investments 3,767 3,740 Accrued income and prepaid expenses 80 65 Non-consolidated holdings 70 70 445 Tangible fixed assets 434 Intangible assets 9 11 Of which: goodwill 9 11 а Other assets 42 76 Total assets 47,863 45,860 Liabilities Due to banks 2,655 1,554 Repurchase agreements 1,809 1,364 31,031 31,375 Customer deposits Trading portfolio liabilities 0 0 Negative mark-to-market values of 236 239 derivative financial instruments Other financial liabilities at fair value 766 851 Medium-term notes 11 7,244 Bonds and mortgage-backed bonds 7,205

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¹⁹Column b, "Under regulatory scope of consolidation," is not included because the numbers are identical to those in column a, "Balance sheet as in published financial statements."

Accrued expenses and deferred income 156 147 Other liabilities 77 81 **Provisions** 15 17 1 2 Of which: deferred tax liabilities on other intangible assets **Total liabilities** 44,341 42,500 Shareholders' equity Reserves for general banking risks 701 701 Share capital 86 86 С Statutory reserves, voluntary reserves, 2,754 2,592 retained earnings, and net profit (loss) for the period -20 -19 Treasury shares Minority interests 0 0 3,361 Total shareholders' equity 3,522

Table 30. Composition of regulatory capital

In CHF millions, BCV Group, full table (CC1)²⁰

	a	a-1	b
			D - (
			References
	31/12/2018	30/06/2018	
mon Equity Tier 1 (CET1)			
Issued and paid-in capital, fully eligible	86	86	С
Retained earnings, including reserves for general banking and net profit (loss) for the period	3,120	3,072	
Capital reserve and currency translation reserve (+/-)	34	34	
Minority interests	0	0	
CET1 before regulatory adjustments	3,240	3,192	
1 regulatory adjustments			
Goodwill (net of related tax liability)	9	11	а
IRB shortfall of provisions to expected losses	56	53	
Net long position in own CET1 instruments	20	19	
Total regulatory adjustments to CET1	85	83	
Net CET1	3,156	3,109	
tional Tier 1 capital (AT1)			
AT1 before regulatory adjustments	-	-	
Total regulatory adjustments to AT1	-	-	
Net AT1	-	-	
Net Tier 1 capital	3,156	3,109	
2 capital (T2)			
Issued and paid-in instruments, fully eligible	-	-	
Minority interests eligible as T2	-	-	
	Retained earnings, including reserves for general banking and net profit (loss) for the period Capital reserve and currency translation reserve (+/-) Minority interests CET1 before regulatory adjustments I regulatory adjustments Goodwill (net of related tax liability) IRB shortfall of provisions to expected losses Net long position in own CET1 instruments Total regulatory adjustments to CET1 Net CET1 tional Tier 1 capital (AT1) AT1 before regulatory adjustments Total regulatory adjustments to AT1 Net AT1 Net Tier 1 capital 2 capital (T2) Issued and paid-in instruments, fully eligible	transit arranger 31/12/2018 mon Equity Tier 1 (CET1) Issued and paid-in capital, fully eligible 86 Retained earnings, including reserves for general banking and net profit (loss) for the period Capital reserve and currency translation reserve (+/-) 34 Minority interests 0 CET1 before regulatory adjustments 3,240 I regulatory adjustments Goodwill (net of related tax liability) 9 IRB shortfall of provisions to expected losses 56 Net long position in own CET1 instruments 20 Total regulatory adjustments to CET1 85 Net CET1 3,156 tional Tier 1 capital (AT1) AT1 before regulatory adjustments - Total regulatory adjustments to AT1 - Net AT1 - Net AT1 - Net Tier 1 capital 3,156 2 capital (T2) Issued and paid-in instruments, fully eligible -	Issued and paid-in capital, fully eligible 86 86 Retained earnings, including reserves for general 3,120 3,072 banking and net profit (loss) for the period Capital reserve and currency translation reserve (+/-) 34 34 Minority interests 0 0 0 CET1 before regulatory adjustments 3,240 3,192 I regulatory adjustments Goodwill (net of related tax liability) 9 11 IRB shortfall of provisions to expected losses 56 53 Net long position in own CET1 instruments 20 19 Total regulatory adjustments to CET1 85 83 Net CET1 3,156 3,109 tional Tier 1 capital (AT1) AT1 before regulatory adjustments to AT1 Net AT1 Net AT1 Net Tier 1 capital 3,156 3,109 2 capital (T2) Issued and paid-in instruments, fully eligible

²⁰Net profit for the current fiscal year is not included in regulatory capital at 30 June (Row 2). Rows not applicable to BCV are not included. The "Impact of transitional arrangements" column is not included because BCV does not apply any transitional arrangements.

50 Valuation adjustments; provisions and impairment for 22 23 prudential reasons; compulsory reserves on financial investments T2 before regulatory adjustments 22 23 T2 regulatory adjustments Net long position in own T2 instruments 57 Total regulatory adjustments to T2 58 Net T2 22 23 59 Total regulatory capital (Net T1 & Net T2) 3,177 3,132 60 Total risk-weighted assets (RWA) 18,423 18,949 Capital ratios CET1 ratio (item 29 as % of RWA) 17.1% 16.4% 62 T1 ratio (item 45 as % of RWA) 17.1% 16.4% 63 Total capital ratio (item 59 as % of RWA) 17.2% 16.5% 64 Specific CET1 buffer (capital conservation buffer + 1.9% 1.9% countercyclical buffer + capital buffer for systemically important banks) (as % of RWA) 65 Of which: in accordance with Basel 1.9% 1.9% minimum standards (as % of RWA) 68 CET1 available to meet buffer requirements in 9.2% 8.5% accordance with Basel minimum standards, after deducting the CET1 covering minimum requirements (as % of RWA) 8.6% 68a CET1 total requirement in accordance with Annex 8 8.5% of the CAO plus the countercyclical buffer in accordance with CAO, Art. 44 and 44a (as % of RWA) 68b Of which: countercyclical buffer in accordance with 0.8% 0.7% CAO, Art. 44 and 44a (as % of RWA) 13.0% 68c CET1 available (as % of RWA) 12.3% 10.4% 10.3% 68d T1 total requirement in accordance with Annex 8 of the CAO plus the countercyclical buffer in accordance with CAO, Art. 44 and 44a (as % of RWA) 68e T1 available (as % of RWA) 14.8% 14.1% 68f Total regulatory capital requirement in accordance 12.8% 12.7% with Annex 8 of the CAO plus the countercyclical buffer in accordance with CAO, Art. 44 and 44a (as % of RWA) 68g Regulatory capital available (as % of RWA) 17.2% 16.5% Amounts below the thresholds for deduction (before risk weighting) Non-significant investments in the common stock of 23 28 other financial entities 73 Significant investments in the common stock of 231 231 financial entities

Table 31. Main features of regulatory capital instruments In CHF millions, BCV Group, (CCA)²¹

III CI	if millions, BCV Group, (CCA)		
		Quantitative or qualitative information	
1	Issuer	Banque Cantonale Vaudoise (BCV), corporation organized under public law, founded by the Vaud Cantonal Parliament on	
		19 December 1845	
2	Unique identifier	ISIN CH 0015251710	
3	Governing laws of the instrument	Cantonal Act Governing the Organization of Banque Cantonale Vaudoise; BCV's articles of association; Swiss Code of Obligations	
	Regulatory treatment		
4	Transitional Basel III rules	CET1	
5	Post-transitional Basel III rules	CET1	
6	Eligible at solo/group/group and solo	Group and solo	
7	Instrument type (to be specified by each jurisdiction)	Equity	
8	Amount recognized in regulatory capital (currency in millions, as of most recent reporting date)	CHF 86,062	
9	Par value of instrument	CHF 10	
10	Accounting classification	Share capital	
11	Original date of issuance	31 December 1995	
12	Perpetual or dated	Perpetual	
14	Issuer call subject to prior supervisory approval	No	
	Coupons and dividends		
17	Fixed or variable coupon or dividend	Variable	
19	Existence of a dividend stopper	No	
20	Fully discretionary, partially discretionary, or mandatory	Fully discretionary	
36	Non-compliant transitioned features	No	

²¹Rows not used are not included.

Table 32. Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories In CHF millions, at 31 December 2018, BCV Group, (LI1)²²

	а	С	d	f	g
				С	arrying values
					Not subject
	As		0.4.5.4.4.	01-1	to capital
	reported in	Subject to	Subject to	-	requirements
	published financial	credit risk	counterparty credit risk	market risk	or subject to deduction
		framework		framework	from capital
Assets					
Cash and cash equivalents	8,235	8,235			
Due from banks	1,921	1,791	130		
Reverse repurchase agreements	314		314		
Loans and advances to customers	5,677	5,668	10		
Mortgage loans	26,079	26,079			
Trading portfolio assets	334			334	
Positive mark-to-market values of derivative financial instruments	268		268	268	
Other financial assets at fair value	621	1		621	
Financial investments	3,767	3,767	1,792		
Accrued income and prepaid expenses	80	80			
Non-consolidated holdings	70	70			
Tangible fixed assets	445	445			
Intangible assets	9				9
Other assets	42	42			
Total assets	47,863	46,178	2,514	1,223	9
Liabilities					
Due to banks	2,655		93		2,562
Repurchase agreements	1,809		1,809		
Customer deposits	31,375		2		31,373
Trading portfolio liabilities	0			0	
Negative mark-to-market values of derivative financial instruments	236		236	236	
Other financial liabilities at fair value	766			766	
Medium-term notes	7				7
Bonds and mortgage-backed bonds	7,244				7,244
Accrued expenses and deferred income	156				156
Other liabilities	77				77

 $^{^{22}}$ Column b is not included since the accounting scope of consolidation is identical to the regulatory scope of consolidation.

Provisions	15	-			15
Total liabilities	44,341	-	2,140	1,002	41,434

Exposures relating to the following line items are assessed across several risk categories:

- Mark-to-market values of derivative financial instruments: derivative transactions generate both counterparty credit risk and market risk;
- Financial investments: bonds used in repo transactions or held as collateral with other financial institutions generate both credit risk and counterparty credit risk.

Table 33. Main sources of differences between regulatory exposure amounts and carrying values in financial statements

In CHF millions, at 31 December 2018, BCV Group, (LI2)

		а	b	d	е
		<u>_ </u>	ltems subject to		
				Counterparty	
		T - 4 - 1	Credit risk	credit risk	Market risk
	A 1	Total	framework	framework	framework
1	Asset carrying value under regulatory scope of consolidation (as per Table LI1)	49,914	46,178	2,514	1,223
2	Liabilities carrying value under regulatory scope of consolidation (as per Table LI1)	3,143	-	2,140	1,002
3	Total net amount under regulatory scope of consolidation	46,772	46,178	373	221
4	Off-balance sheet amounts	6,708	2,824	-	-
5	Differences in valuations	151	-	151	-
6	Differences due to different netting rules, other than those already included in row 2	124	-	124	-
7	Differences due to consideration of provisions	94	94	-	-
8	Differences due to prudential filters	-12	-12	-	-
10	Exposure amounts considered for regulatory purposes	53,837	49,084	649	221

Differences between the values reported in the financial statements and the regulatory amounts can be attributed to the following factors:

- Off-balance-sheet positions (contingent liabilities and undrawn revocable and irrevocable credit limits)
- Valuation differences for repo transactions (exposure after regulatory haircut)

Provisions that are deducted from total exposure amounts according to the accounting standard applied at BCV

Add-ons to derivative positions and forward contracts

Assets in the trading book are measured at fair value based on their prices in liquid markets. Fair values are checked daily by the Market Risk Unit within the Risk Management Department (see Section 5.1). Given the valuation method that the Bank uses, no prudential valuation adjustments are made (and, as such, Table PV1 is not applicable).

7.2 Leverage ratio

Table 34. Summary comparison of accounting assets vs. leverage ratio exposure measure In CHF millions, BCV Group, (LR1)

		31/12/2018	30/06/2018
1	Total consolidated assets as per published financial statements	47,863	45,860
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation, as well as adjustment for assets deducted from Tier 1 capital	-85	-83
3	Adjustment for fiduciary assets recognized on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	-	-
4	Adjustment for derivative financial instruments	93	31
5	Adjustment for securities financing transactions (SFTs)	6	1
6	Adjustment for off-balance-sheet items	2,775	2,486
7	Other adjustments	-	-
8	Leverage ratio exposure measure	50,651	48,296

The growth in total assets reflects increases in loans and advances to customers, mortgage lending, and amounts due from banks (see Table 29). The difference between the financial assets reported on the balance sheet and the leverage ratio exposure measure stems primarily from off-balance-sheet transactions (CHF 2.775bn at 31 December 2018).

Table 35. Leverage ratio common disclosures

In CHF millions, BCV Group, (LR2)

		31/12/2018	30/06/2018
	-balance-sheet exposure		
1	On-balance-sheet exposure (excluding derivatives and SFTs, but including collateral)	45,469	43,882
2	Assets deducted in determining Tier 1 capital	-85	-83
3	Total on-balance-sheet exposures within the leverage ratio framework, excluding derivatives and SFTs	45,384	43,800
Der	ivative exposure		
4	Replacement cost associated with all derivatives transactions, including those with central counterparties (net of eligible cash variation margin and/or with bilateral netting)	97	89
5	Add-on amounts for PFE associated with all derivatives transactions	390	397
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the operative accounting framework	-	-
7	Deduction of receivables assets for cash variation margin provided in derivatives transactions	-126	-156
8	Deduction relating to exposure to QCCPs if there is no obligation to reimburse the client in the event of the QCCP defaulting	-	-
9	Adjusted effective notional amount of written credit derivatives, after deduction of negative replacement values	-	-
10	Adjusted effective notional offsets of bought/written credit derivatives and add-on deductions for written credit derivatives	0	0
11	Total derivative exposure	361	330
Sec	curities financing transaction (SFT) exposure		
12	Gross SFT assets with no recognition of netting, including sale accounting transactions, less the items specified in margin no. 58 FINMA Circular 2015/3	2,126	1,678
13	Netted amounts of cash payables and cash receivables relating to SFT counterparties	-	-
14	CCR exposure for SFT assets	6	1
15	Agent transaction exposure	-	-
16	Total SFT exposure	2,132	1,679
Oth	er off-balance-sheet exposure		
17	Off-balance-sheet exposure at gross national amounts before application of credit conversion factors	7,133	7,186
18	Adjustments for conversion to credit equivalent amounts	-4,358	-4,700
	Total off-balance-sheet exposure	2,775	2,486
	pital and total exposure	·	· · · · · · · · · · · · · · · · · · ·
20	Tier 1 capital	3,156	3,109
21	Total exposure	50,651	48,296
Lev	rerage ratio		
22	Leverage ratio	6.2%	6.4%

The difference between the amount of total accounting assets on the balance sheet and the balance-sheet exposure used to calculate the leverage ratio (row 1 of Table 35) is due to the Bank's repo agreements (CHF 2.126bn at 31 December 2018) and derivatives (mark-to-market value of CHF 268m at 31 December 2018).

7.3 Disclosure map, analytical classifications, and abbreviations

7.3.1 Disclosure map

The Basel III Accord sets out the minimum disclosure requirements. The relationships between the tables in the Accord, those in FINMA circular 2016/1, "Disclosure – banks," and those in this report are described below.

Table 36. Disclosure map

Basel			_	
reference	Barantatian		Frequency	0 1
code	Description	no.	under FINMA	Comment
Overview KM1	Kov motrico		Comionnuol	
	Key metrics		Semiannual	
OVA	Bank risk management approach	• • • • • • • • • • • • • • • • • • • •	Annual	
OV1	Overview of RWA	4	Semiannual	
Linkages I	between financial statements and re			
LI1	Differences between accounting	32	Annual	
	and regulatory scopes of			
	consolidation and mapping of			
	financial statement categories with			
	regulatory risk categories			
LI2	Main sources of differences	33	Annual	
	between regulatory exposure			
	amounts and carrying values in			
	financial statements			
LIA	Explanations of differences	Ch. /	Annual	
	between accounting and regulatory			
D) //	exposure amounts		0 '	N 1 0 1
PV1	Prudential valuation adjustments		Semiannual	No prudential valuation adjustments
CC1	Composition of regulatory capital	30	Semiannual	•
CC2	Reconciliation of regulatory capital to balance sheet	29	Semiannual	
CCA	Main features of regulatory capital instruments	31	Semiannual	
Leverage				
LR1	Summary comparison of	34	Semiannual	
	accounting assets vs leverage ratio			
	exposure measure			
LR2	Leverage ratio common disclosures	35	Semiannual	
Credit risk	{			
CRA	General qualitative information	Ch. 4	Annual	
	about credit risk			
CR1	Credit quality of assets	10	Semiannual	
CR2	Changes in stock of defaulted loans	11	Semiannual	
	and debt securities			
CRB	Additional disclosure related to the credit quality of assets	Ch. 4	Annual	Updated half- yearly

CRC	Qualitative disclosure requirements related to credit risk mitigation techniques	Ch. 4	Annual	
CR3	Credit risk mitigation techniques – overview	12	Semiannual	
CRD	Qualitative disclosure on the Bank's use of external credit ratings under the standardized approach for credit risk	Ch. 4	Annual	
CR4	Standardized approach – credit risk exposure and credit risk mitigation (CRM) effects	17	Semiannual	
CR5	Standardized approach – exposure by asset class and risk weight	18	Semiannual	
CRE	Qualitative disclosures related to IRB models	Ch. 4	Annual	Updated half- yearly
CR6	IRB – Credit risk exposure by portfolio and probability of default (PD) range	13	Semiannual	•
CR7	IRB – Effect on RWA of credit derivatives used as CRM techniques	-	Semiannual	No credit derivatives
CR8	RWA flow statements of credit risk exposure under IRB	14	Semiannual	
CR9	IRB – Backtesting of PD per portfolio	15	Annual	
CR10	IRB – Specialized lending and equities under the simple risk weight method	16 + 24	Semiannual	
CCRA	Qualitative disclosure related to counterparty credit risk	Ch. 4	Annual	
CCR1	Analysis of counterparty credit risk (CCR) exposure by approach	19	Semiannual	Not required for
CCR2	Credit Valuation Adjustment (CVA) capital charge	22	Semiannual	Category 3 banks
CCR3	Standardized approach – CCR exposure by regulatory portfolio and risk weight	20	Semiannual	
CCR4	IRB – CCR exposure by portfolio and PD range	19	Semiannual	
CCR5	Composition of collateral for CCR exposure	21	Semiannual	
CCR7	RWA flow statements of CCR exposure under the Internal Model Method (IMM)		Semiannual	IMM approach not used at BCV
CCR8	Exposure to central counterparties (CCPs)	22	Semiannual	
Market ris	sk and liquidity			
SECA	Qualitative disclosure requirements related to securitization exposure		Annual	
SEC1	Securitization exposure in the banking book		Semiannual	No securitization
SEC2	Securitization exposure in the		Semiannual	— exposure

SEC3 Securitization exposure in the Semiannual banking book and associated regulatory capital requirements bank acting as originator or sponsor SEC4 Securitization exposure in the Semiannual banking book and associated regulatory capital requirements bank acting as investor MRA Ch. 5 Annual General qualitative disclosure requirements related to market risk MR1 Market risk under the Standardized 23 Annual Updated half-Approach (SA) yearly MRB Qualitative disclosures for banks Annual IMA approach not used at BCV using the Internal Models Approach MR2 RWA flow statements of market risk Semiannual exposure under the IMA BCV does not use MR3 IMA values for trading portfolios Semiannual an internal model MR4 Comparison of VaR estimates with Semiannual gains and losses **IRRBBA1** Interest-rate risk – Quantitative 25 + Semiannual information on the structure of Ch. 5.3 positions, and maturity repricing **IRRBB1** Interest-rate risk - Quantitative Semiannual 26 + information on the economic value Ch. 5.3 of equity and net interest income LIQ1 28 + Ch. 5 Semiannual Liquidity coverage ratio

7.3.2 Analytical classifications

This section describes the different analytical classifications used in this document that are not already defined within the framework of the Basel III Accord.

Table 37. Basel III Accord asset categories (IRB)

No.	Asset category	Description
1	Central governments and central banks (F-IRB)	The Swiss national government, BIS, central banks, multilateral development banks eligible for a 0% risk weighting, and foreign governments
3	Banks and securities firms (F-IRB)	Bank counterparties
5	Non-central govt. public-sector entities; multilateral development banks (F-IRB)	Cantonal governments and municipal authorities
7	Corporates - specialized lending (F-IRB)	Real-estate financing for counterparties rated with the "real- estate professionals" rating model, together with trade-finance transactions
9	Corporates - other lending (F-IRB)	Companies that do not meet the retail criteria, the Mortgage- Bond Bank of the Swiss Mortgage Institutions, and the Central Mortgage-Bond Institution
11	Mortgage-backed retail exposure	Mortgage-backed exposure to individuals and companies that meet the retail criteria
13	Other retail exposure	Other exposure to individuals and companies that meet the retail criteria

Table 38. Risk segments

Type of	
counterparty	Description
Retail	Individuals with less than CHF 250,000 in assets or income, or who have a mortgage loan of up to CHF 1.2 million
Private banking	Individuals who meet at least one of the following criteria: assets or income of more than CHF 250,000, or a mortgage loan of over CHF 1.2 million
SMEs	Small and medium-sized businesses, excluding real-estate professionals and trade-finance counterparties, that employ up to 150 people, are not listed on the stock exchange, and have full-year revenue of below CHF 50 million
Real-estate professionals	Individuals or entities whose main professional activity involves real-estate development and/or investment
Large corporates	Listed companies that meet at least one of the following criteria (excluding trade-finance counterparties): more than 150 employees; or full-year revenue of at least CHF 50 million
Public-sector entities	Swiss national, cantonal, and municipal governments
Trade finance	Non-bank counterparties involved in trade-finance activities
Banks	Bank counterparties, including central counterparties since 1 January 2013

Table 39. Supervisory slotting and PD rating model (scope of F-IRB approach)

Rating model	Description		
BCV staff	Individuals who are BCV employees		
Private banking	Individuals or groups of individuals with no commercial loans and with CHF 300,000 in assets with BCV or who are financed exclusively with Lombard loans		
Retail	Individuals or groups of individuals with no commercial loans and who do not meet the criteria for "Private banking" or "BCV employees"		
SME	Small and mid-sized businesses		
Large corporates	Large businesses		
Banks	Banking institutions		
Vaud municipalities	Municipalities in Vaud Canton		

Real-estate professionals

Individuals and entities that are mainly active in real-estate

investment for their own account, excluding real-estate development

projects

Trade finance

(supervisory slotting criteria for specialized

lending)

Transactions to finance international commodities trading

Transactions to finance real-estate development

Real-estate development

(supervisory slotting criteria for specialized

lending)

7.3.3 List of abbreviations

ALCO Asset and Liabilities Management Committee

ALM Asset and Liability Management

ALM-FM The Bank's ALM and Financial Management Department

BCV Banque Cantonale Vaudoise

BIS Bank for International Settlements

BoD Board of Directors

CAO Ordinance of 1 June 2012 concerning capital adequacy and risk

diversification for banks and securities traders (known as the "Capital

Adequacy Ordinance")

CCF Credit conversion factor

CCO Chief Credit Officer

CCP Central counterparty, an institution that acts as an intermediary between two

parties to secure a transaction by becoming the counterparty to the buyer and

the seller

CCR Counterparty credit risk

CEO Chief Executive Officer

CF Commodities finance

CFO Chief Financial Officer

CLS Continuous linked settlement

CRM Credit risk mitigation

CSA Credit Support Annex, an optional annex for ISDA netting agreements

CVA Credit valuation adjustment: capital requirement aimed at covering the risk

of loss in market value as a result of deterioration in the

counterparty's credit quality

ΔEVE Change in the economic value of equity

ΔNII Change in net interest income

EAD Exposure at default

EBCC Executive Board Credit Committee

EBRMC Executive Board Risk Management Committee

EL Expected loss

F-IRB Foundation Internal Ratings-Based approach

FINMA Swiss Financial Market Supervisory Authority

GMRA Global Master Repurchase Agreement of the Public Securities

Association/International Securities Market Association (PSA/ISMA)

HQLA High-quality liquid assets

ICS Internal control system

ID BCV's "in default" provisioning category

IMA Internal Models Approach

IMM Internal Model Method

IPRE Income-producing real estate

IRB Internal ratings-based

IRRBB Interest-rate risk in the banking book

ISDA International Swaps and Derivatives Association

LCR Liquidity coverage ratio

LGD Loss given default

LIBOR London Interbank Offered Rate

NII Net interest income

NSFR Net stable funding ratio

OTC Over the counter

PD Probability of default

PFE Potential future exposure

QCCP Qualified central counterparty

RD BCV's "reputed to be in financial difficulty" provisioning category

RMPS BCV's Risk Management Policy and Strategy

RWA Risk-weighted assets

SFT Securities financing transaction

SIC Swiss Interbank Clearing

SNB Swiss National Bank

SA-BIS International Standardized Approach in accordance with the CAO

VaR Value at risk

7.4 Parent-company disclosures

When capital and liquidity requirements are calculated at group level, the group is generally only required to provide consolidated disclosures (known as the disclosure exemption).

Under FINMA Circular 2016/1, the Bank is nevertheless required to disclose the following parent-company figures.

Table 40. Main parent-company figures In CHF millions, at 31 December 2018, (KM1)

		a	С	е
		31/12/2018	30/6/2018	31/12/2017
Ava	ilable capital			
1	Common Equity Tier 1 (CET1)	3,034	2,977	2,987
2	Tier 1 (T1)	3,034	2,977	2,987
3	Total capital	3,055	2,999	3,008
Risk	k-weighted assets (RWA)			
4	Total RWA	17,989	18,500	17,752
4a	Minimum capital requirement	1,439	1,480	1,420
Risk	k-based capital ratios as % of RWA			
5	CET1 ratio	16.9%	16.1%	16.8%
6	Tier 1 ratio	16.9%	16.1%	16.8%
7	Total capital ratio	17.0%	16.2%	16.9%
Add	litional CET1 buffer requirements (Basel	Committee) as % o	f RWA	
8	Capital conservation buffer requirement (2.5% from 2019)	1.9%	1.9%	1.3%
9	Countercyclical buffer requirement	-	-	-
11	Total of bank CET1 specific buffer requirements	1.9%	1.9%	1.3%
12	CET1 available after meeting the bank's minimum capital requirements (i.e., after the CET1 allocated to cover minimum capital requirements and any TLAC requirements)	9.0%	8.2%	8.9%
FINI	MA capital ratio requirements			
12a	CET1 buffer (CAO, Annex 8)	4.0%	4.0%	4.0%
12b	Countercyclical buffer (CAO, Art. 44 and 44a)	0.8%	0.7%	0.7%
12c	CET1 total requirement in accordance with Annex 8 of the CAO plus the countercyclical buffer (CAO, Art. 44 and 44a)	8.6%	8.5%	8.5%
12d	Tier 1 total requirement in accordance with Annex 8 of the CAO plus the countercyclical buffer (CAO, Art. 44 and 44a)	10.4%	10.3%	10.3%
12e	Total regulatory capital requirement in accordance with Annex 8 of the CAO plus the countercyclical buffer (CAO, Art. 44 and 44a)	12.8%	12.7%	12.7%

Basel III leverage ratio						
13	Total Basel III leverage ratio exposure	50,651	48,296	47,886		
	measure					
14	Basel III leverage ratio (Tier 1 capital	6.0%	6.2%	6.2%		
	as % of total Basel III leverage ratio					
	exposure measure)					

	a	b	С	d	е
	Q4 2018	Q3 2018	Q2 2018	Q1 2018	Q4 2017
Liquidity coverage ratio (LCR)					_
15 Total high-quality liquid assets (HQLA)	8,453	8,225	8,602	8,465	8,906
16 Total net cash outflow	7,538	7,351	7,433	7,181	7,281
17 LCR	112%	112%	116%	118%	122%