

Guidelines amending Guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) on the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds to ensure compliance with the CRR ‘quick fix’ in response to the COVID-19 pandemic

(EBA/GL/2020/12)

These Guidelines from the European Authority Banking (EBA) are addressed to competent authorities, as defined in point (i) of Article 4(2) of Regulation (EU) No 1093/2010, and to credit institutions as defined in point 1 of Article 4(1) of Regulation (EU) No 575/2013.

The Guidelines have been developed to specify the uniform disclosure format in accordance with which the disclosures required under Articles 468 and 473a of Regulation (EU) No 575/2013 (the “CRR”) should be made. In particular, the Guidelines set out the template and instructions that institutions should use to disclose the own funds, capital and leverage ratios they would have in case they were not apply the adjustments to unrealised gains and losses measured at fair value through other comprehensive income, and the IFRS9 adjustments, set out in the articles mentioned above.

These Guidelines have been developed by the EBA in accordance with Article 16 of Regulation (EU) No 1093/2010. The EBA published the English version of these Guidelines on 11 August 2020 and the Spanish version on 5 October 2020.

The Guidelines apply from 11 August 2020, date of their publication in English, until the end of the transitional periods referred to in Article 468 and 473a of the CRR, i.e. until 31 December 2024 and 31 December 2022 respectively.

The Executive Commission of the Banco de España, in its role of competent authority for the direct supervision of the less significant credit institutions for the purposes of the Single Supervisory Mechanism, adopted these Guidelines as their own on 21 September 2020.

These Guidelines, as well as the EBA/GL/2018/01 to which they modify, related to the uniform disclosures under Article 473a of Regulation (EU) No 575/2013 as regards

transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds, will apply to Specialised Lending Institutions.

EBA/GL/2020/12

11 August 2020

Final report

Guidelines amending Guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) on the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds to ensure compliance with the CRR 'quick fix' in response to the COVID-19 pandemic

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1. Executive summary

Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 amending Regulations (EU) No 575/2013 and (EU) 2019/876 as regards certain adjustments in response to the COVID-19 pandemic¹ (CRR – Capital Requirements Regulation - ‘quick fix’) was published in the Official Journal of the EU (European Union) on 26 June 2020. The CRR ‘quick fix’ is part of a series of measures taken by European institutions to mitigate the impact of the COVID-19 pandemic on institutions across EU Member States. In addition to the flexibility already provided in the existing rules, the CRR ‘quick fix’ introduces certain adjustments to the CRR, including temporary measures, intended, inter alia, to enhance credit flows to companies and households, thereby supporting the EU’s economy.

In addition, the CRR ‘quick fix’ introduces transparency requirements for institutions that decide to apply the temporary measures introduced by the regulation. Relevant and meaningful disclosures by institutions should ensure that stakeholders have the necessary information to understand the impact on their own funds, own funds ratios and leverage ratio of the temporary measures applied, thus reducing the asymmetry of information and contributing to the ultimate objective of market discipline.

The EBA is issuing these guidelines, which amend the EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds, to provide clarity to institutions and users of information on the implementation of part of the disclosure requirements included in the CRR ‘quick fix’ and how institutions should disclose the information required.

These guidelines are part of the EBA’s efforts to clarify the flexibility embedded in the regulatory capital framework, provide operational relief in response to the COVID-19 pandemic and help institutions implement part of the new disclosures that are linked to the regulatory measures adopted in the context of the pandemic.

Because the guidelines do not introduce new disclosures but merely specify how disclosures imposed with CRR 2 and the CRR ‘quick fix’ should be made, and having regard to the urgency of the matter, as the specifications set out in these guidelines relate to obligations already in force for institutions, the EBA decided not to carry out public consultations or a cost-benefit analysis in this case, in order to provide institutions with legal certainty as early as possible and the maximum time possible to prepare. The EBA has notified the Banking Stakeholder Group (BSG) of its intention to issue these guidelines but has not requested the BSG’s advice.

¹ OJ L 204, 26.6.2020, p. 4.

2. Background and rationale

1. Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 amending Regulations (EU) No 575/2013 and (EU) 2019/876 as regards certain adjustments in response to the COVID-19 pandemic² (CRR 'quick fix') was published in the Official Journal of the EU on 26 June 2020. The CRR 'quick fix' is part of a series of measures taken by European institutions to mitigate the impact of the COVID-19 pandemic on institutions across EU Member States. In addition to the flexibility already provided in the existing rules, the CRR 'quick fix' introduces certain adjustments to the CRR, including temporary measures, intended, inter alia, to enhance credit flows to companies and households, thereby supporting the EU's economy. The adjustments introduced include the following:

- Guarantees provided in the context of the COVID-19 pandemic by national governments or other public entities are treated more favourably for the purposes of minimum coverage requirements under the CRR.
- Certain exposures to central banks can be excluded from the calculation of an institution's total exposure measure, and the offsetting mechanism has been modified (Article 500b of Regulation (EU) No 575/2013³).
- The application of the leverage buffer requirement for globally systemically important institutions, implemented by Regulation (EU) No 575/2013 as amended by Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 (CRR 2)⁴, has been deferred by 1 year to 1 January 2023.
- The introduction of a temporary treatment that allows institutions to remove from the calculation of their CET1 (Common Equity Tier 1) items unrealised gains and losses measured at fair value through other comprehensive income during the period from 1 January 2020 to 31 of December 2022.
- Transitional arrangements for mitigating the impact on own funds of the introduction of IFRS 9 have been extended by 2 years.

² OJ L 204, 26.6.2020, p. 4.

³ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for institutions and investment firms and amending Regulation (EU) No 648/2012 (OJ L 176, 27.6.2013, p. 1).

⁴ Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 amending Regulation (EU) No 575/2013 as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, and Regulation (EU) No 648/2012, OJ L 150, 7.6.2019, p. 1-225.

- The prudential treatment of SMEs and infrastructure exposures, as well as loans to pensioners and employees (with a permanent contract) backed by the borrower's pension or salary, is more favourable. The changes would have been implemented under CRR 2 in the middle of 2021 anyway, but their implementation has now been brought forward.
2. In addition, the CRR 'quick fix' includes transparency requirements for institutions that decide to apply the temporary measures introduced by the regulation. Relevant and meaningful disclosures by institutions should ensure that stakeholders have the necessary information to understand the impact on their own funds, own funds ratios and leverage ratios of the temporary measures applied, thus reducing the asymmetry of information and contributing to the ultimate objective of market discipline.
 3. The EBA is issuing these guidelines, which amend the EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds, to provide clarity to institutions and users of information on the implementation of part of the disclosure requirements included in the CRR 'quick fix' and how institutions should disclose the information required.
 4. The purpose of these amending guidelines is to cover the disclosures required in new Article 468 and amended Article 473a of the CRR 'quick fix' as regards the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income, and IFRS 9 transitional arrangements, respectively.
 5. These guidelines are part of the EBA's efforts to clarify the flexibility embedded in the regulatory capital framework, provide operational relief in response to the COVID-19 pandemic and help institutions implement the new disclosures that are linked to the regulatory measures adopted in the context of the pandemic.
 6. Because the guidelines do not introduce new disclosures but merely specify how disclosures imposed with CRR 2 and the CRR 'quick fix' should be made, and having regard to the urgency of the matter, as the specifications set out in these guidelines relate to obligations already in force for institutions, the EBA decided not to carry out public consultations or a cost-benefit analysis in this case, in order to provide institutions with legal certainty as early as possible and the maximum time possible to prepare. The EBA has notified the BSG of its intention to issue these guidelines but has not requested the BSG's advice.

Disclosure requirements included in the CRR 'quick fix' implemented in the amending guidelines

Disclosure related to new Article 468

7. Article 468 of CRR 'quick fix' relates to the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in view of the COVID-19 pandemic.

8. This article introduces a temporary treatment that allows institutions to remove from the calculation of their Common Equity Tier 1 (CET1) items, unrealised gains and losses measured at fair value through other comprehensive income, corresponding to exposures to central governments, to regional governments or to local authorities referred to in Article 115(2) CRR and to public sector entities referred to in Article 116(4) CRR, excluding those financial assets that are credit-impaired, during the period from 1 January 2020 to 31 December 2022. This article replaces the current article that was applicable until 31 of December 2017.
9. Institutions are required to state in their Pillar 3 reports if they have chosen to apply the treatment envisaged in this article.
10. In addition to disclosing the information required in Part Eight of Regulation (EU) No 575/2013 (the CRR), the same Article 468 requires institutions that have decided to apply the temporary treatment set out in this article to disclose the amounts of own funds, CET1 capital and Tier 1 capital, the total capital ratio, the CET1 capital ratio, the Tier 1 capital ratio and the leverage ratio that they would have if they were not to apply that treatment.

Disclosure related to amended Article 473a

11. The amendments to Article 473a introduce adjustments to the formula for the calculation of the ECL amounts that can be added back to CET1 capital. The formula applies diverse factors for the calculation of the two components. Paragraph 6 has been replaced and a new paragraph 6a has been inserted. Both paragraphs include the relevant factors for the calculation of the transitional arrangements and extend the period during which institutions may apply the IFRS 9 transitional arrangements by 2 years (up until 31 December 2024).
12. As before, institutions whose financial year commences after 1 January 2020 but before 1 January 2021 are required to adjust the dates for the computation of the transitional arrangements and disclose the new dates.
13. Paragraph 7a has been added and allows institutions to replace the rescaling of all exposure values that are reduced by ECL provisions with a standard risk weight of 100% to be assigned to the amounts added back to CET1 capital. Institutions may choose only once whether to use the calculation set out in point (b) of paragraph 7 or the calculation set out in new paragraph 7a, and are required to disclose their decision.
14. In accordance with paragraph 8 of Article 473a, as replaced by the CRR 'quick fix', during the periods set out in paragraphs 6 and 6a of the same article, in addition to disclosing the information required in Part Eight, institutions that have decided to apply the transitional arrangements set out in this article must report to competent authorities and must disclose the amounts of own funds, CET1 capital and Tier 1 capital, the CET1 capital ratio, the Tier 1 capital ratio, the total capital ratio and the leverage ratio they would have if they were not to apply this article. Institutions applying IFRS 9 transitional arrangements were already required to disclose similar information on the same parameters.

15. Finally, the CRR 'quick fix' also replaces paragraph 9 of Article 473a. New paragraph 9 includes disclosures requirements for institutions that are similar to those envisaged in old paragraph 9, including whether they have decided to apply transitional arrangements and, if relevant, if they have decided to reverse that original decision. Institutions that have decided to apply the transitional arrangements set out in Article 473a are also required to disclose if they decide not to apply paragraph 4 of the same article, and if relevant, if they reverse the decision to apply that paragraph. In addition, institutions that have decided to apply the transitional arrangements set out in Article 473a are also required to disclose if they decide not to apply paragraph 2 of the same article and, if relevant, if they reverse the decision to apply that paragraph.

Disclosure requirements included in the CRR 'quick fix' implemented in the amending guidelines

16. Paragraph 10 of Article 473a, which has not been adjusted by the CRR 'quick fix', required the EBA to issue guidelines on the disclosure requirements laid down in Article 473a. Following this mandate, the EBA issued the Guidelines on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds (EBA/GL/2018/01), which are being amended by the amending guidelines.

17. The amending guidelines include the following changes to the EBA/GL/2018/01:

- a. Adjustments have been made to reflect the revised disclosure requirements included in Article 473a of the CRR. These changes are mainly related to the extension of the transitional period, and therefore the disclosure period, and to the revision of the accompanying narrative of the disclosure template, to properly reflect all the information that institutions have to disclose regarding their choices. The quantitative information on the fully loaded capital, capital ratios and leverage ratio as implemented in the current guidelines is still valid and does not need to be amended.
- b. The scope of the guidelines is extended to cover the new disclosure requirement regarding the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in accordance with Article 468.

18. The amending guidelines have the same level of application as Guidelines EBA/GL/2018/01.

EBA/GL/2020/12

11 August 2020

Guidelines

amending Guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) on the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds to ensure compliance with the CRR 'quick fix' in response to the COVID-19 pandemic

1. Compliance and reporting obligations

Status of these guidelines

1. This document contains guidelines issued pursuant to Article 16 of Regulation (EU) No 1093/2010⁵. In accordance with Article 16(3) of Regulation (EU) No 1093/2010, competent authorities and financial institutions must make every effort to comply with the guidelines.
2. Guidelines set out the EBA's view of appropriate supervisory practices within the European System of Financial Supervision or of how Union law should be applied in a particular area. Competent authorities as defined in Article 4(2) of Regulation (EU) No 1093/2010 to whom guidelines apply should comply by incorporating them into their practices as appropriate (e.g. by amending their legal framework or their supervisory processes), including if guidelines are directed primarily at institutions.

Reporting requirements

3. According to Article 16(3) of Regulation (EU) No 1093/2010, competent authorities must notify the EBA as to whether they comply or intend to comply with these guidelines, or otherwise give reasons for non-compliance, by 12 October 2020. In the absence of any notification by this deadline, competent authorities will be considered by the EBA to be non-compliant. Notifications should be sent by submitting the form available on the EBA website with the reference 'EBA/GL/2020/12'. Notifications should be submitted by persons with appropriate authority to report compliance on behalf of their competent authorities. Any change in the status of compliance must also be reported to the EBA.
4. Notifications will be published on the EBA website, in line with Article 16(3).

⁵ Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC, (OJ L 331, 15.12.2010, p. 12).

2. Subject matter and addressees

Subject matter

5. These guidelines amend Guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013⁶ (the 'Guidelines') to ensure compliance with Regulation (EU) No 575/2013⁷, as amended by Regulation (EU) 2019/876⁸ (CRR 2) and Regulation (EU) 2020/873⁹ (CRR 'quick fix').

Addressees

6. These guidelines are addressed to competent authorities as defined in point (i) of Article 4(2) of Regulation (EU) No 1093/2010 and to credit institutions as defined in point (1) of Article 4(1) of Regulation (EU) No 575/2013.

3. Implementation

Date of application

7. These guidelines apply from 11 August 2020 until the end of the transitional periods referred to in paragraph 1 of Article 468 and in paragraphs 6 and 6a of Article 473a of Regulation (EU) No 575/2013.

4. Amendments

⁶ https://eba.europa.eu/sites/default/documents/files/documents/10180/2084799/302d6722-c37b-4869-ba12-6d3b4a1092fb/Guidelines%20on%20uniform%20disclosure%20of%20IFRS%209%20transitional%20arrangements_EN.pdf.

⁷ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (OJ L 176, 27.6.2013, p. 1).

⁸ Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 amending Regulation (EU) No 575/2013 as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, and Regulation (EU) No 648/2012 (OJ L 150, 7.6.2019, p. 1-225).

⁹ Regulation (EU) 2020/873 of the European Parliament and of the Council of 24 June 2020 amending Regulations (EU) No 575/2013 and (EU) 2019/876 as regards certain adjustments in response to the COVID-19 pandemic (OJ L 204, 26.6.2020, p. 4-17).

8. Paragraph 5 of the Guidelines has been replaced by the following:

'5. These guidelines specify the uniform disclosure format in accordance with which the disclosures required under Articles 468 and 473a of Regulation (EU) No 575/2013 (the "CRR") should be made.'

9. Paragraph 6 of the Guidelines has been replaced by the following:

'6. These guidelines apply to institutions that are subject to all or part of the disclosure requirements specified in Part Eight of the CRR in accordance with Articles 6, 10 and 13 of the CRR.'

10. Paragraph 7 of the Guidelines is replaced by the following:

'7. These guidelines apply during the transitional periods referred to in paragraph 1 of Article 468 and in paragraphs 6 and 6a of Article 473a of Regulation (EU) No 575/2013.'

11. Paragraph 12 of EBA/GL/2018/01 has been amended as follows:

'Institutions that choose to apply Article 468 or Article 473a of the CRR should complete the quantitative template contained in Annex I, in accordance with the instructions included therein.

'Those institutions among those mentioned in paragraph 1 of Article 473a that choose not to apply Article 473a should disclose the narrative commentary on Article 473a indicated in Annex I, in accordance with the instructions included therein.

'Those institutions that choose not to apply the temporary treatment in accordance with Article 468 should disclose the narrative commentary on Article 468 indicated in Annex I, in accordance with the instructions included therein.'

12. Annex I has been replaced by the following:

Annex I — Template on the comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the

application of the temporary treatment in accordance with Article 468 CRR

Template IFRS 9/Article 468-FL: Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR

Purpose: Provide a comparison of the institutions' own funds, CET1 capital, Tier 1 capital, risk-weighted assets, CET1 capital ratio, Tier 1 capital ratio, total capital ratio and leverage ratio with and without the application of transitional arrangements for IFRS 9 or analogous ECLs.

Provide a comparison of the institutions' own funds, CET1 capital, Tier 1 capital, CET1 capital ratio, Tier 1 capital ratio, total capital ratio and leverage ratio with and without the application of the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in view of the COVID-19 pandemic, in accordance with Article 468 of the CRR.

Only the transitional arrangements arising from the implementation of the IFRS 9 and analogous ECLs, and the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in view of the COVID-19 pandemic in accordance with Article 468, are considered in this template.

Scope of application: The quantitative template is mandatory for all institutions that choose to apply Article 468 and/or Article 473a of the CRR and are subject to all or part of the disclosure requirements specified in Part Eight of the CRR, in accordance with Articles 6, 10 and 13 of the CRR.

Narrative commentary on Article 473a: Those institutions referred to in paragraph 1 of Article 473a that are subject to all or part of the disclosure requirements specified in Part Eight of the CRR but, pursuant to the first subparagraph of paragraph 9 of the same article, choose not to apply the transitional arrangements specified in Article 473a should instead disclose a narrative commentary explaining that they are not applying the transitional arrangements for IFRS 9 or analogous ECLs, any changes in that decision over the time period and that their own funds, capital and leverage ratios already reflect the full impact of IFRS 9 or analogous ECLs.

Narrative commentary on Article 468: Those institutions that are subject to the disclosure requirements specified in Part Eight of the CRR but, pursuant to the first subparagraph of paragraph 3 of Article 468, choose not to apply the temporary treatment specified in Article 468 should instead disclose a narrative commentary explaining that they are not applying the temporary treatment specified in Article 468s, any changes on that decision over the time period and that their own funds, capital and leverage ratios already reflect the full impact of unrealised gains and losses measured at fair value through other comprehensive income.

Content: Institutions should disclose each metric's value included in the quantitative template at the end of the reporting period.

Frequency: Until 28 June 2021, institutions should disclose this information in accordance with the frequency set out in paragraphs 25, 26 and 27 of EBA/GL/2014/14, as amended by EBA/GL/2016/11 for the disclosure of information on own funds (paragraph 25(a)), risk-weighted assets (paragraph 25(b)(i)) and leverage ratio (paragraph 25(c)). After 28 June 2021, institutions should disclose this information with the frequency required in Articles 433a, 433b and 433c for the disclosure of key metrics in accordance with Article 447 of the CRR.

Format: Fixed format for the quantitative template. For institutions that do not apply the IFRS 9 transitional arrangements, the format of the narrative commentary on Article 473a is flexible. For institutions that do not apply the temporary treatment in accordance with Article 468 of CRR, the format of the narrative commentary on Article 468 is flexible.

Accompanying narrative: Institutions applying the IFRS 9 transitional arrangements should provide a narrative accompanying the quantitative template that explains the key elements of the transitional arrangements they use. Pursuant to the second subparagraph of paragraph 7a of Article 473a of the CRR, institutions should also provide information on whether they use the calculation set out in point (b) of paragraph 7 or the calculation set out in the first subparagraph of paragraph 7a.

Pursuant to the second subparagraph of paragraph 9 of Article 473a of the CRR, institutions should, in particular, provide explanations of all their choices regarding the options included in the same paragraph, including whether they are applying paragraph 2 and/or paragraph 4 of Article 473a or not, and any changes in the application of these options.

Institutions should also provide explanations of changes to the prudential metrics included in the template from the last disclosure period due to the application of the transitional arrangements for IFRS 9 or analogous ECLs, and/or to the application of the temporary treatment in accordance with Article 468 in which these changes are material.

Quantitative template						
		a	b	c	d	e
		T	T-1	T-2	T-3	T-4
Available capital (amounts)						
1	CET1 capital					
2	CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied					
3	Tier 1 capital					
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
5	Total capital					
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
Risk-weighted assets (amounts)						
7	Total risk-weighted assets					
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
Capital ratios						
9	CET1 (as a percentage of risk exposure amount)					
10	CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
11	Tier 1 (as a percentage of risk exposure amount)					
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
13	Total capital (as a percentage of risk exposure amount)					
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
Leverage ratio						
15	Leverage ratio total exposure measure					
16	Leverage ratio					

17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied					
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					

Instructions

Row Number	Explanation
1	Amount of CET1 capital in accordance with the amount disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 29 of the 'Own funds disclosure template')
2	Amount of CET1 capital as if the amount of IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
3	Amount of Tier 1 capital in accordance with the amount disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 45 of the 'Own funds disclosure template')
4	Amount of Tier 1 capital as if the amount of IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
5	Amount of total capital in accordance with the amount disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 59 of the 'Own funds disclosure template')
6	Amount of total capital as if the amount of IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
7	Amount of total risk-weighted assets in accordance with the amount disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 60 of the 'Own funds disclosure template')
8	Amount of total risk-weighted assets as if the amount of IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied
9	CET1 capital ratio in accordance with the value disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 61 of the 'Own funds disclosure template')
10	CET1 capital ratio as if IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied ¹¹
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
11	Tier 1 capital ratio in accordance with the value disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 62 of the 'Own funds disclosure template')
12	Tier 1 capital ratio as if IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied Error! Bookmark not defined.
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
13	Total capital ratio in accordance with the value disclosed by institutions following the ITS on disclosure of own funds requirements ¹⁰ (row 63 of the 'Own funds disclosure template')

¹⁰ Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013 laying down implementing technical standards with regard to disclosure of own funds requirements for institutions according to Regulation (EU) No 575/2013 of the European Parliament and of the Council (OJ L 355, 31.12.2013, p. 60).

¹¹ When disclosing this ratio, institutions should consider those transitional arrangements for IFRS 9 or analogous ECLs that have an impact both on the numerator and on the denominator.

Row Number	Explanation
14	Total capital ratio as if IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied Error! Bookmark not defined.
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
15	Leverage ratio total exposure measure in accordance with the amount disclosed by institutions following the ITS on disclosure of leverage ratio ¹² (row 21 of the table 'LRCom: Leverage ratio common disclosure')
16	Leverage ratio in accordance with the value disclosed by institutions following the ITS on disclosure of leverage ratio ¹² (row 22 of the table 'LRCom: Leverage ratio common disclosure')
17	Leverage ratio calculated as if as if the amount of IFRS 9 or analogous ECLs transitional arrangements calculated in accordance with Article 473a of the CRR had not been applied Error! Bookmark not defined.
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied
	Reporting periods
	Reporting periods T, T-1, T-2, T-3 and T-4 are defined as quarterly periods. Institutions should disclose the dates corresponding to the reporting periods. Institutions disclosing this template on a quarterly basis should provide data for periods T, T-1, T-2, T-3 and T-4; institutions disclosing this template on a semi-annual basis should provide data for periods T, T-2 and T-4; and institutions disclosing this template on an annual basis should provide data for periods T and T-4. The disclosure of data for previous periods is not required when data are disclosed for the first time. Information on previous periods is required only when the previous periods are later than the starting date of their first financial year, starting on or after 1 January 2018.
	Last disclosure period
	Institutions must disclose information in rows 2, 4, 6, 8, 10, 12, 14 and 17, when relevant, until the end of the transitional period in accordance with paragraphs 6 and 6a of Article 473 of the CRR.
	Institutions must disclose information in rows 2a, 4a, 6a, 8, 10a, 12a, 14a and 17a, when relevant, until the end of the transitional period in accordance with paragraph 2 of Article 468 of the CRR.

¹² Commission Implementing Regulation (EU) 2016/200 of 15 February 2016 laying down implementing technical standards with regard to disclosure of the leverage ratio for institutions, according to Regulation (EU) No 575/2013 of the European Parliament and of the Council (OJ L 39, 16.2.2016, p. 5).