

EN

ANNEX VI –

**DISCLOSURE ON THE MINIMUM REQUIREMENT FOR OWN FUNDS AND
ELIGIBLE LIABILITIES**

Instructions for disclosure templates

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1. General instructions

1. Structure and conventions

1.1. Structure

1. This framework consists of three groups of templates:
 - (a) MREL and TLAC of resolution groups and resolution entities;
 - (b) MREL and TLAC of non-resolution entities and material subsidiaries of non-EU G-SIIs;
 - (c) creditor ranking of issuing entities;
2. For each template legal references are provided. Further detailed information regarding more general aspects of the reporting of each set of templates and instructions concerning specific positions are included in this part of the Regulation.

1.2. Numbering convention

3. The document follows the labelling convention described below, when referring to the columns, rows and cells of the templates.
 - (d) The following general notation is followed: {Template;Row;Column}.
 - (e) References inside a template do not include an indication of the template: {Row;Column}.
 - (f) In case of templates with only one column, only rows are referred to: {Template;Row}
 - (g) An asterisk sign is used to express that the reference covers the rows or columns specified before.

1.3. Sign convention

4. Any amount that increases the own funds and eligible liabilities, the total risk exposure amounts, the total exposure measure or the requirements shall be disclosed as a positive figure. In contrast, any amount that reduces the own funds and eligible liabilities, the total risk exposure amounts, the total exposure measure or the requirements shall be disclosed as a negative figure. Where there is a negative sign (-) preceding the label of an item no positive figure is expected to be reported for that item.

1.4. Abbreviations

5. The following abbreviations apply for the purposes of the Annexes to this Regulation:
- (h) 'CRR' refers to Regulation (EU) No 575/2013;
 - (i) 'CRD' refers to Directive 2013/36/EU of the European Parliament and of the Council;
 - (j) 'BRRD' refers to Directive 2014/59/EU of the European Parliament and of the Council;
 - (k) 'MREL' refers to the minimum requirement for own funds and eligible liabilities pursuant to Article 45 of the BRRD;
 - (l) 'TLAC' refers to the requirements for own funds and eligible liabilities for G-SIIs pursuant to Article 92a of the CRR;
 - (m) 'Internal TLAC' refers to the requirement for own funds and eligible liabilities for non-EU G-SIIs pursuant to Article 92b of the CRR;

1.5 Carrying amounts and outstanding amounts

6. Amounts of own funds shall be disclosed as carrying amounts. Amounts of liabilities shall be disclosed as outstanding amounts. The outstanding amount of a claim or instrument is the sum of the principal amount of, and accrued interest on, the claim or instrument. The outstanding amount due is equal to the value of the claim which the creditor could file under insolvency proceedings.
7. By way of derogation from the previous paragraph, balance sheet liabilities arising from derivatives shall be reported in the form of carrying amounts. The carrying amount shall be the carrying amount as defined for FINREP purposes, either under IFRS or nGAAP, as applicable. Otherwise, figures under nGAAP reporting schemes shall be used.

2. KM2 : Key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities

8. Information is provided for each resolution group as defined in article 2(1)(83b) BRRD.
9. Institutions shall explain in the narrative accompanying the template any material difference between the own funds amounts disclosed and the IFRS 9 fully loaded

amount at the resolution group level. They shall also explain any material difference between the IFRS 9 fully loaded amount at the resolution group level compared to the IFRS 9 fully loaded amount at prudential group level.

Question for consultation

Q4. Template KM2 in the BCBS standard includes special rows to reflect the own funds amounts on an IFRS9 fully loaded basis. There is a template implemented in the EU with this information at the level of the prudential scope of consolidation. The instructions for KM2 ask institutions to explain any material difference between the own funds amounts disclosed and the IFRS 9 fully loaded amount at the resolution group level. They are also asked to explain any material difference between the IFRS 9 fully loaded amount at the resolution group level compared to the prudential group level. Do respondents agree that this is a good way to request this information, rather than adding specific rows, considering that this information will cease to be relevant once the IFRS 9 transition period is over?

Legal references and instructions

Columns	Explanation
a	<p>Institutions shall disclose in this column the relevant information on the minimum requirement for own funds and eligible liabilities (MREL) according to Article 45 BRRD.</p> <p>Institutions shall disclose the value as of the end of the disclosure period.</p>
B to f	<p>Institutions that are G-SIIs subject a Requirement for own funds and eligible liabilities pursuant to Article 92a of the CRR shall disclose in these columns the relevant information on that requirement.</p> <p>Disclosure periods T, T-1, T-2, T-3 and T-4 are quarterly periods.</p> <p>Institutions shall disclose the dates corresponding to the disclosure periods.</p> <p>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</p>

Legal references and instructions	
Rows	Explanation
1	<p>Own funds and eligible liabilities</p> <p>Equal to the values disclosed in disclosure template EU TLAC1 row 22</p>
EU-1a	<p>Own funds and eligible liabilities - Of which own funds and subordinated liabilities</p> <p>Equal to the value disclosed in disclosure template EU TLAC1 row EU-22a</p> <p>Own funds, and eligible liabilities included in the amount of own funds and eligible liabilities pursuant to Article 45b BRRD which are subordinated eligible instruments as defined in Article 2(1)(71b) BRRD.</p>
2	<p>Total risk exposure amount of the resolution group (TREA)</p> <p>Equal to the value disclosed in disclosure template EU TLAC1 row 23</p> <p>Article 45 (2) (a) BRRD, Article 92(3) CRR.</p>
3	<p>Own funds and eligible liabilities as a percentage of TREA (row 1/row2)</p> <p>Equal to the values disclosed in disclosure template EU TLAC1 row 25.</p> <p>For the purpose of this row, the amount of own funds and eligible liabilities that is disclosed in row 1 shall be expressed as a percentage of the total risk exposure amount calculated in accordance with Article 92(3) CRR.</p>
EU-3a	<p>Own funds and eligible liabilities as a percentage of TREA (row1/row2) - Of which own funds and subordinated liabilities</p> <p>Equal to the value disclosed in disclosure template EU TLAC1 row EU-25a</p> <p>For the purpose of this row, the amount of own funds and subordinated eligible liabilities that is reported in row EU-1b shall be expressed as a percentage of the total risk exposure amount calculated in accordance with Article 92(3) CRR.</p>
4	<p>Total exposure measure of the resolution group</p> <p>Equal to the value disclosed in disclosure template EU EBA TLAC1 row 24</p> <p>Article 45 (2) (b) BRRD, Articles 429(4) and 429a CRR.</p>

5	<p>Own funds and eligible liabilities as a percentage of the total exposure measure</p> <p>Equal to the value disclosed in disclosure template EU EBA TLAC1 row 26.</p> <p>For the purpose of this row, the amount of own funds and eligible liabilities that is reported in row 1 shall be expressed as a percentage of the total exposure measure calculated in accordance with Articles 429(4) and 429a CRR.</p>
EU-5a	<p>Own funds and eligible liabilities as a percentage of the total exposure measure (row1/row4) - Of which own funds and subordinated liabilities</p> <p>Equal to the value disclosed in disclosure template EU TLAC1 row EU-26a</p> <p>For the purpose of this row, the amount of own funds and subordinated eligible liabilities that is reported in row EU-1 shall be expressed as a percentage of the total exposure measure calculated in accordance with Articles 429(4) and 429a CRR</p>
6a	<p>Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities instruments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption) This row shall only be reported by institutions subject to the G-SII requirement for own funds and eligible liabilities.</p> <p>Aggregate amount of non-subordinated eligible liabilities instruments which the resolution authority has permitted to qualify as eligible liabilities instruments for the purpose of the Requirement for own funds and eligible liabilities for G-SIIs (TLAC) pursuant to Article 72b(3) CRR.</p> <p>As exemptions in Article 72b(3) and (4) CRR are mutually exclusive, this row shall not be populated if the entity indicates ‘yes’ in row 6b.</p>
6b	<p>Does the subordination exemption in Article 72(b)(4) of the CRR apply? (5% exemption)</p> <p>This row shall only be reported by institutions subject to the Requirement for own funds and eligible liabilities for G-SIIs.</p> <p>If the resolution authority permits liabilities to qualify as eligible liabilities instruments in accordance with Article 72b(4) CRR, the reporting entity shall indicate ‘yes’.</p> <p>If the resolution authority does not permit liabilities to qualify as eligible liabilities instruments in accordance with Article 72b(4) CRR, the resolution group or resolution entity shall indicate ‘no’.</p> <p>As exemptions in Article 72b(3) and (4) CRR are mutually exclusive, this</p>

	row shall not be populated if the reporting entity has populated row 6a.
6c	<p>If a capped subordination exemption applies under Article 72b(3) or 4, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)</p> <p>This row shall only be reported by institutions subject to the G-SII requirement for own funds and eligible liabilities.</p> <p>This line informs the owners of senior debt issued by the resolution entity about the percentage of non-excluded senior debt that has been considered eligible, so that, where applicable, they will be able to apply the deductions regime set forth in article 72e CRR.</p> <p>If a capped subordination exemption applies under Article 72(b)(3) or (4) CRR, institutions shall report:</p> <p>(i) the amount of funding issued that ranks pari passu with excluded liabilities and is included in the amount reported in row 1, divided by the amount of funding issued that ranks pari passu with excluded liabilities (Article 72a (2) CRR) and that would be recognised under row 1 if no cap was applied.</p>
	Minimum requirement for own funds and eligible liabilities (MREL)
EU-7	<p>MREL requirement expressed as percentage of the total risk exposure amount</p> <p>The entity's minimum requirement for own funds and eligible liabilities as determined by the resolution authority in accordance with Article 45BRRD, expressed as a percentage of TREA calculated in accordance with Article 92(3) CRR.</p>
EU-8	<p>>>> Of which to be met with own funds or subordinated liabilities</p> <p>Where applicable, the part of the MREL requirement which, pursuant to paragraphs (4) to (8) of Article 45b BRRD, the resolution authority has required to be met using own funds, subordinated eligible instruments, or liabilities as referred to in paragraph 3 of that Article, expressed as a percentage of TREA calculated in accordance with Article 92(3) CRR.</p>
EU-9	<p>MREL requirement expressed as percentage of the total exposure measure</p> <p>The reporting entity's minimum requirement for own funds and eligible lia-</p>

	bilities as determined by the resolution authority pursuant to in accordance with Article 45 BRRD, expressed as a percentage of the total exposure measure calculated in accordance with Articles 429(4) and 429a CRR.
EU-10	>>> Of which to be met with own funds or subordinated liabilities Where applicable, the part of the MREL requirement which, pursuant to paragraphs (4) to (8) of Article 45b of the BRRD, the resolution authority has required to be met using own funds, subordinated eligible instruments, or liabilities as referred to in paragraph 3 of that Article, expressed as a percentage of the total exposure measure calculated in accordance with Articles 429(4) and 429a CRR.

3. TLAC 1: Composition - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities

10. Information is provided for each resolution group as defined in article 2(1)(83b) BRRD.
11. The own funds and eligible liabilities position related to the resolution group shall include only capital instruments and eligible liabilities issued by the resolution entity and, where compliant with the relevant provisions, subsidiaries of the resolution entity, at the exclusion of entities outside of the resolution group. Similarly, the own funds and eligible liabilities position is based on the risk exposure amount (adjusted as permitted under article 45(h)(2) BRRD) and total exposure measures calculated at the level of the resolution group.
12. Regarding the regulatory adjustments, banks shall disclose deductions from own funds and eligible liabilities as positive numbers and additions to own funds and eligible liabilities as negative numbers.

Legal references and instructions	
Columns	Explanation
a	Institutions shall disclose in this column the relevant information on the minimum requirement for own funds and eligible liabilities (MREL) pursuant to Article 45 BRRD.

b	Institutions that are G-SIIs subject to a Requirement for own funds and eligible liabilities for G-SIIs pursuant to Article 92a of the CRR shall disclose in this column the relevant information on that requirement.
c	<p>This column shall only be filled in by institutions subject to the G-SII requirement for own funds and eligible liabilities.</p> <p>This column shall reflect the difference between amounts of liabilities eligible to fulfill the requirement of Article 45 BRRD and the amount of liabilities eligible to fulfill the requirement of Article 92a CRR.</p>

Legal references and instructions

Row	Instructions
1	<p>Common Equity Tier 1 Capital (CET1)</p> <p>CET1 capital of the resolution group, calculated in line with article 50 of CRR.</p>
2	<p>Additional Tier 1 capital (AT1)</p> <p>AT1 capital of the resolution group, calculated in line with article 61 CRR.</p>
6	<p>Tier 2 capital (T2)</p> <p>Tier 2 capital of the resolution group, calculated in line with article 71 CRR.</p>
11	<p>Own funds and eligible liabilities for the purpose of Articles 92a CRR and 45 BRRD arising from regulatory capital instruments</p> <p>Own funds and eligible liabilities for the purpose of articles 92a CRR and 45 of BRRD arising from regulatory capital instruments, to be calculated as row 1+ row 2 + row 6.</p>
12	<p>Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities</p> <p>(not grandfathered)</p> <p><i>MREL</i></p> <p><u>Eligible liabilities included in the</u> amount of own funds and eligible liabilities pursuant to Article 45b BRRD which are subordinated eligible instruments as defined in Article 2(1)(71b) of the BRRD and which are issued directly by the resolution entity.</p>

	<p><i>TLAC</i></p> <p>Eligible liabilities which comply with all the requirements set forth in Articles 72a to 72d CRR, at the exclusion of liabilities permitted to qualify as eligible liability instruments pursuant to Articles 72b(3) or (4) CRR, and which are issued directly by the resolution entity.</p> <p>This row shall neither include the amortised portion of T2 instruments where remaining maturity is greater than one year (Article 72a(1)(b) CRR) nor eligible liabilities grandfathered under Article 494b of the CRR.</p>
EU 12a	<p>Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)</p> <p><i>MREL</i></p> <p>Eligible liabilities included in the amount of own funds and eligible liabilities pursuant to Article 45b BRRD which are subordinated eligible instruments as defined in Article 2(1)(71b) of the BRRD, that are issued by subsidiaries and included in MREL an in compliance with Article 45b(3) BRRD.</p> <p><i>TLAC</i></p> <p>Eligible liabilities which comply with all the requirements set forth in articles 72a to 72d CRR, at the exclusion of liabilities permitted to qualify as eligible liability instruments pursuant to Articles 72b(3) or (4) CRR, that are issued by subsidiaries and qualify for inclusion in the consolidated eligible liabilities instruments of an institution pursuant to Article 88a CRR.</p> <p>This row shall neither include the amortised portion of T2 instruments where remaining maturity is greater than one year (Article 72a(1)(b) CRR) nor eligible liabilities grandfathered under Article 494b of the CRR</p>
EU-12b	<p>Eligible liabilities instruments that are subordinated to excluded liabilities, issued prior to 27 June 2019 (subordinated grandfathered)</p> <p><i>MREL</i></p> <p>Eligible liabilities that meet the following conditions:</p> <ul style="list-style-type: none"> - <u>they have been issued prior to 27 June 2019</u> - <u>they are</u> subordinated eligible instruments as defined in Article 2(1)(71b) of the BRRD, - <u>they are included in own funds and eligible liabilities as a result of Article 494b(3) CRR.</u> <p><i>TLAC</i></p>

	<p>Liabilities that meet the following conditions:</p> <ul style="list-style-type: none"> - they have been issued prior to 27 June 2019 - they comply with Article 72b(2)(d) - they qualify as eligible liabilities as a result of the grandfathering set out in Article 494b(3) CRR.
EU-12c	<p>Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items</p> <p>Amortised portion of T2 instruments where remaining maturity is greater than one year (article 72a(1)(b) CRR).</p> <p>Only the amount not recognised in regulatory capital but meeting all eligibility criteria according to article 72b CRR shall be reported in this row.</p>
13	<p><u>Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre cap)</u></p> <p><i>MREL</i></p> <p>Liabilities that comply with the conditions set forth in Article 45b BRRD and that are not wholly subordinated to claims arising from excluded liabilities referred to in Article 72a(2) CRR</p> <p><i>TLAC</i></p> <p>Eligible liabilities which comply with the requirements set forth in Articles 72a to 72d, except for point (d) of Article 72b(2) CRR and without applying the restrictions set out in paragraphs (3) to (5) of Article 72b(2) CRR.</p> <p>In the case of TLAC, the full amount without application of the 3.5% and 5% caps set out in article 72b (3) or (4) CRR shall be reported in this row.</p> <p>This row shall not include any amount recognisable on a transitional basis in accordance with Article 494b(3) CRR.</p>
EU-13a	<p>Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)</p> <p><i>MREL</i></p> <p>Eligible liabilities that meet the following conditions:</p> <ul style="list-style-type: none"> - they have been issued prior to 27 June 2019 - they comply with the conditions set forth in article 45b BRRD and are not wholly subordinated to claims arising from excluded liabilities referred to in Article 72a(2) CRR - they qualify as eligible liabilities as a result of the grandfathering set out in according to Article 494b(3) CRR.

	<p>TLAC</p> <p>eligible liabilities which meet the following conditions:</p> <ul style="list-style-type: none"> - they have been issued prior to 27 June 219 - they comply with the requirements set forth in articles 72a to 72d, except for point (d) of Article 72b(2) CRR and without applying the restrictions set out in paragraphs (3) to (5) of Article 72b(2) CRR - they qualify as eligible liabilities as a result of the grandfathering set out in according to Article 494b(3) CRR. <p>a)</p>
14	<p>>>> Amount of non subordinated instruments eligible, where applicable after the application of paragraphs 72b(3) or (4) CRR</p> <p>The amount reported in rows 13 and 13a above after the application of paragraphs 72b(3) or (4) CRR, where applicable. For entities that are not subject to the requirement in Article 92a CRR, or where 72b(3) CRR does not apply, this row shall equal rows 13+row 13a (caps only apply to TLAC, and not to MREL).</p>
17	<p>Eligible liabilities items</p> <p>Eligible liabilities items before adjustments. To be calculated as row 12+ row EU-12a+ row 12b + row 14.</p>
EU-17a	<p>Of which subordinated liabilities</p> <p>MREL</p> <p>Eligible liabilities included in the amount of own funds and eligible liabilities pursuant to Article 45b BRRD which are subordinated eligible instruments as defined in Article 2(1) (71b) of the BRRD.</p> <p>TLAC</p> <p>Eligible liabilities included in the amount of own funds and eligible liabilities pursuant to Article 45b BRRD which are subordinated eligible instruments as defined in Article 2(1) (71b) of the BRRD.</p> <p>Eligible liabilities which comply with all the requirements set forth in articles 72a to 72d CRR, at the exclusion of liabilities permitted to qualify as eligible liability instruments pursuant to Articles 72b(3) or (4) CRR.</p> <p>This row shall include subordinated liabilities that are applicable as a result of grandfathering under Article 494b CRR and the amortised portion of T2 instruments where remaining maturity is greater than one year (Article 72a(1)(b) CRR).</p> <p>To be calculated as row 12 + row EU12a + row EU12b + row EU12c.</p>

18	<p>Own funds and eligible liabilities items before adjustments</p> <p>Own funds and eligible liabilities items before adjustments. To be calculated as row 11+ row 17.</p>
19	<p>(Deduction of exposures between MPE resolution groups)</p> <p>Negative amount</p> <p>Deductions of exposures between MPE G-SIB resolution groups, that correspond to direct, indirect or synthetic holdings of own funds instruments or eligible liabilities instruments of one or more subsidiaries which do not belong to the same resolution group as the resolution entity, in accordance with article 72e(4) CRR.</p>
20	<p>(Deduction of investments in other eligible liabilities instruments)</p> <p>Negative amount</p> <p>Deductions of investments in other eligible liabilities instruments, according to articles 72e (1) to (3), 72f, 72g, 72h, 72i and 72j CRR. Amount to be deducted from eligible liabilities items in accordance with section 2 of chapter 5a of Part two, Title I of CRR</p>
22	<p>Own funds and eligible liabilities after adjustments</p> <p>Own funds and eligible liabilities as defined in article 72l CRR. To be calculated as row 18+ row 19 + row 20.</p> <p>The amount of own funds and eligible liabilities counting towards MREL shall be disclosed as the sum of:</p> <ul style="list-style-type: none"> (i) own funds as set out in Articles 4(1)(118) and 72 CRR, (ii) eligible liabilities included in the amount of own funds and liabilities that meet the conditions referred to Article 45b of the BRRD. <p>The amount of own funds and eligible liabilities counting towards the Requirement for own funds and eligible liabilities for G-SIIs (TLAC) shall be the amount referred to in Article 72l CRR, consisting of:</p> <ul style="list-style-type: none"> (i) <u>own funds as set out in Articles 4(1)(118) and 72 CRR,</u> (ii) eligible liabilities as referred to in Article 72a to 72e CRR.
EU-22a	<p>Of which own funds and subordinated liabilities</p> <p>Own funds, and eligible liabilities included in the amount of own funds and eligible liabilities pursuant to Article 45b BRRD which are subordinated eligible instruments as defined in Article 2(1)(71b) of BRRD.</p>

23	<p>Total risk exposure amount adjusted as permitted by article 45h(2) of Directive 2014/59/EU</p> <p>Total risk-weighted assets of the resolution group, according to the last subparagraph of article 18 (1) CRR.</p>
24	<p>Total exposure measure</p> <p>According to Article 45(2) (b) of BRRD, the total exposure measure calculated in accordance with Articles 429(4) and 429a of CRR.</p>
25	<p>Own funds and eligible liabilities as a percentage of the total exposure measure</p> <p>For the purpose of this row, in accordance with Article 12a(2) letter a of BRRD and Articles 92a of CRR, the amount of own funds and eligible liabilities counting towards MREL respectively the amount of own funds and eligible liabilities counting towards the G-SII requirement for own funds and eligible liabilities, as applicable, that is disclosed in row 1 shall be expressed as a percentage of the total risk exposure amount calculated in accordance with Article 92(3) of CRR.</p> <p>Own funds and eligible liabilities ratio (as a percentage of the risk-weighted exposure amount of the resolution group), to be calculated as row row 22 divided by row 23.</p>
EU-25a	<p>Of which own funds and subordinated</p> <p>For the purpose of this row, the amount of own funds and subordinated eligible liabilities counting towards MREL shall be expressed as a percentage of the total risk exposure amount calculated in accordance with Article 92(3) CRR To be calculated as row 22a divided by row 23.</p>
26	<p>Own funds and eligible liabilities as a percentage of total exposure measure</p> <p>Own funds and eligible liabilities ratio (as a percentage of the total exposure measure of the resolution group), to be calculated as row 22 divided by row 24.</p>
EU-26	<p>Of which own funds and subordinated</p> <p>For the purpose of this row, the amount of own funds and subordinated eligible liabilities counting towards MREL shall be expressed as a percentage of the total exposure measure calculated in accordance with Articles 429(4) and 429a CRR.</p> <p>To be calculated as row 22a divided by 24.</p>

27	<p>CET1 (as a percentage of TREA) available after meeting the resolution group’s requirements</p> <p>The amount of CET1, as a percentage of TREA, equal to zero or positive, available after meeting each of the requirements referred to in points (a), (b) and (c) of Article 141a(1)CRD and:</p> <p>(a) where applicable, the G-SII requirement for own funds and eligible liabilities pursuant to Article 92a CRR</p> <p>(b) where applicable the minimum requirement for own funds and eligible liabilities pursuant to Article 45 BRRD.</p> <p>The disclosed figure shall be identical in both MREL and TLAC columns.</p> <p>It shall take into account the effect of transitional provisions on the own funds and eligible liabilities, the total risk exposure amount and the requirements themselves. Neither the guidance on additional own funds as referred to by Article 104b CRD nor the combined buffer requirements of Article 128 (6) CRD shall be considered.</p>
28	<p>Institution-specific combined buffer requirement</p> <p>Institution-specific combined buffer requirement defined in Article 128(6) CRD, expressed as a percentage of total risk exposure amount, applicable to the resolution group according to article 128(6) CRD.</p>
29	<p>of which: capital conservation buffer requirement</p> <p>The amount of the institution specific combined buffer (expressed as a percentage of total risk exposure amount) that relates to the capital conservation buffer requirement.</p>
30	<p>of which: countercyclical buffer requirement</p> <p>The amount of the institution specific combined buffer (expressed as a percentage of total risk exposure amount) that relates to the countercyclical buffer requirement.</p>
31	<p>of which: systemic risk buffer requirement</p> <p>The amount of the institution specific combined buffer (expressed as a percentage of total risk exposure amount) that relates to the systemic risk buffer requirement.</p>
EU-31a	<p>of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer</p> <p>The amount of the institution specific combined buffer (expressed as a percentage of total risk exposure amount) that relates to the G-SII or O-SII</p>

	buffer requirement.
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iLAC: Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs (internal TLAC)

13. This templates discloses own funds and eligible liabilities for the purposes of the requirement for own funds and eligible liabilities of entities that are not themselves resolution entities pursuant to Article 45f BRRD (internal MREL) as well as the requirement for own funds and eligible liabilities for non-EU G-SIIs applicable to material subsidiaries of third country G-SIIs pursuant to Article 92b CRR (internal TLAC).

Legal references and instructions	
Columns	Explanation
a	Institutions shall disclose in this column the relevant information on the minimum requirement for own funds and eligible liabilities (MREL) according to Articles 45 to 45g BRRD.
B	Institutions that are material subsidiaries of non-EU G-SIIs pursuant to Article 92b CRR shall disclose in this column the relevant information on requirements for own funds and eligible liabilities according to Article 92b CRR.
c	Qualitative information. related to the applicable requirement and the level of application

Legal references and instructions	
Row	Instructions
EU 1	Is the entity subject to a Non-EU G-SII Requirement for own funds and eligible liabilities? (Y/N) Whether the entity is subject to a Non-EU G-SII Requirement for own funds

	and eligible liabilities, pursuant to Article 92b of CRR.
EU 2	<p>If EU1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis?</p> <p>Whether the entity is subject to a Non-EU G-SII Requirement for own funds and eligible liabilities on a consolidated or individual basis, pursuant to Article 18 CRR.</p> <p>Where the requirement is on a consolidated basis, this entire template shall be filled on a consolidated basis. In all other cases this template shall be filled on an individual basis.</p>
EU 2a	<p>Is the entity subject to an internal MREL requirement ? (Y/N)</p> <p>Whether the entity is subject to an MREL requirement pursuant to Article 45f BRRD?</p>
EU 2b	<p>If EU 2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis?</p> <p>Whether the entity is subject to an internal MREL on a consolidated or individual basis.</p> <p>Where the requirement is on a consolidated basis, this entire template shall be filled on a consolidated basis. In all other cases this template shall be filled on an individual basis.</p>
EU 3	<p>Common Equity Tier 1 Capital</p> <p>Article 50 CRR</p> <p>CET1 capital, on an individual or consolidated basis, where applicable, in line with article 50 CRR</p>
EU 4	<p>Eligible Additional Tier 1 instruments</p> <p>Article 52 of Regulation (EU) No 575/2013</p> <p>Additional Tier 1 instruments eligible for the requirements set forth in Article 92b CRR and in Article 45f(2)(b)(ii) BRRD.</p>
EU 5	<p>Eligible Tier 2 (T2) instrumentss</p> <p>Article 63 of Regulation (EU) No 575/2013. T2 instruments eligible for the requirements set forth in Article 92b CRR and in Article 45f(2)(b)(ii) BRRD.</p>
EU 6	<p>Eligible own funds</p>

	Sum of CET1 capital, Additional Tier 1 instruments and Tier 2 instruments.
EU 7	<p>Eligible liabilities</p> <p>For the purpose of internal MREL, eligible liabilities shall consist of liabilities that fulfil the conditions set out in Article 45f(2) BRRD.</p> <p>For the purpose of the Requirement for own funds and eligible liabilities for non-EU G-SIIs, the amount of eligible liabilities shall be calculated in accordance with Article 72k CRR where they fulfil the conditions set out in Article 92b(2) CRR.</p>
EU 8	<p>Of which permitted guarantees</p> <p>For the purpose of internal MREL, where the resolution authority of the subsidiary permits the entity to meet the internal MREL requirement with guarantees, the amount of guarantees that are provided by the resolution entity and fulfil all the conditions set out in Article 45f(5) BRRD.</p>
EU 9	<p>Own funds and eligible liabilities items</p> <p>Amounts of eligible own funds and eligible liabilities of the entity counting towards internal MREL as set out in Article 45f(2) BRRD and, where applicable counting towards the Requirement for own funds and eligible liabilities for non-EU G-SIIs as set out in Article 92b(2) CRR. To be calculated as row EU6 + EU-7.</p>
EU 10	<p>Total risk exposure amount</p> <p>Total risk exposure amount (individual or of the consolidated group at which the requirements have been set, as applicable), according to the last subparagraph of article 18(1) CRR.</p>
EU 11	<p>Total exposure measure</p> <p>Leverage exposure measure (denominator of leverage ratio, individual or of the consolidated group at which the requirements have been set, as applicable) in accordance with section 7 CRR.</p>
EU 12	<p>Own funds and eligible liabilities (as a percentage of TREA)</p> <p>Own funds and eligible liabilities ratio, as a percentage of the total risk exposure amount.</p> <p>To be calculated as row EU-9 divided by row EU-13</p>
EU 13	<p>>>> Of which permitted guarantees</p> <p>Guarantee provided by the resolution entity as permitted by the resolution authority of the subsidiary, that complies with the conditions set forth in</p>

	article 45f(5) BRRD.
EU 14	<p>Own funds and eligible liabilities (as a percentage of total exposure measure)</p> <p>Own funds and eligible liabilities ratio, as a percentage of the total exposure measure.</p> <p>To be calculated as row EU-9 divided by row EU-14</p>
EU 15	<p>>>> Of which permitted guarantees</p> <p>Guarantee provided by the resolution entity as permitted by the resolution authority of the subsidiary, that complies with the conditions set forth in article 45f(5) BRRD.</p>
EU 16	<p>CET1 (as a percentage of tht total risk exposure amount) available after meeting the entity's requirements</p> <p>The amount of CET1, equal to zero or positive, available after meeting each of the requirements referred to in points (a), (b) and (c) of Article 141a(1) and:</p> <p>(a) where applicable, the non EU G-SII requirement for own funds and eligible liabilities pursuant to Article 92b CRR</p> <p>(b) where applicable the minimum requirement for own funds and eligible liabilities pursuant to Article 45f BRRD.</p> <p><u>The reported figure shall be identical in both MREL and TLAC columns.</u></p> <p><u>It shall take into account the effect of transitional provisions on the own funds and eligible liabilities, the total risk exposure amount and the requirements themselves. Neither the guidance on additional own funds as referred to by Article 104b CRD nor the combined buffer requirements of Article 128 (6) CRD shall be considered.</u></p>
EU 17	<p>Institution-specific combined buffer requirement</p> <p>Institution-specific combined buffer requirement defined in Article 128(6) CRD, expressed as a percentage of TREA, applicable to the entity according to article 128(6) CRD.</p>
EU 18	<p>Requirement expressed as a percentage of the total risk exposure amount</p> <p>For internal MREL, requirement for own funds and eligible liabilities applicable to the institution in accordance with article 45f BRRD, expressed as percentage of TREA(at individual or at consolidated level, as applicable)</p> <p>For internal TLAC, requirement set out in Article 92b CRR, expressed as</p>

	percentage of the total risk exposure amount (at individual or at consolidated level, as applicable).
EU 19	<p>>>> of which may be met with a guarantee</p> <p>Where applicable, part of the requirement for own funds and eligible liabilities expressed as a percentage of the total exposure measure which can be met a guarantee provided by the resolution entity, according to article 45f(5) BRRD.</p>
EU 20	<p>Requirement expressed as percentage of the total risk exposure measure</p> <p>For internal MREL, requirement for own funds and eligible liabilities applicable to the institution in accordance with article 45f BRRD, expressed as percentage of TREA (at individual or at consolidated EU parent undertaking level, as applicable)</p> <p>For internal TLAC, requirement set out in Article 92b CRR, expressed as percentage of the total exposure measure (at individual or at consolidated level, as applicable).</p>
EU 21	<p>>>> of which may be met with a guarantee</p> <p>Where applicable, part of the requirement for own funds and eligible liabilities expressed as a percentage of the total exposure measure which can be met a guarantee provided by the resolution entity, according to article 45f(5) BRRD.</p>

4. TLAC2: Creditor ranking - entities that are not resolution entities themselves

14. From the application date of Article 45i(3) of BRRD, issuing entities shall disclose under this template liabilities potentially eligible for meeting MREL and TLAC. Before that date, issuing entities shall disclose liabilities potentially eligible for meeting TLAC.
15. The outstanding amounts referred to in the rows have to be broken down into insolvency rankings on the basis of the insolvency law of the issuing entity, irrespective of the governing law of the instrument.
16. Insolvency rankings shall be those communicated by the competent resolution authority in compliance with the standardised presentation specified in Article 8 of this Regulation.

17. The ranking is presented from the most junior to the more senior. Columns for rankings have to be added until the most senior ranking eligible instrument, and all pari passu liabilities, have been reported.
18. The table therefore contains all funding that is pari passu or junior to MREL-eligible instruments, including own funds and other capital instruments.
19. The amount attributable to each ranking is further broken down into amounts owned by the resolution entity, including amounts owned directly or indirectly by the resolution entity through entities along the chain of ownership, where applicable; and other amounts not owned by the resolution entity, where applicable. The total amount of each row is filled into the last column of each row.

Legal references and instructions	
Rows	Explanation
2	<p>Description of creditor ranking (free text)</p> <p>The number of insolvency rankings (n) in the creditor hierarchy will depend on the set of liabilities of the issuing entity. The description should include a specification of the types of claims that are within that insolvency class ranking (eg CET1, Tier 2 instruments).</p> <p>There is one column for each insolvency ranking where the amount is held entirely by the resolution entity, and a second column where a part of the amount per ranking is also held by owners that are not the resolution entity.</p>
3	<p>Total liabilities and own funds including derivative liabilities (TLOF)</p> <p>The amount of own funds, eligible liabilities and liabilities ranking lower than or pari passu with own funds or eligible liabilities.</p> <p>This shall include also liabilities excluded from bail-in.</p>
4	<p>o/w excluded liabilities</p> <p>Breakdown of the liabilities excluded pursuant to Article 72a(2) CRR or Article 44(2) BRRD.</p>
5	<p>Total liabilities and own funds less excluded liabilities</p> <p>TLOF net of excluded liabilities</p>
6	<p>Subset of TLOF less excluded liabilities that are own funds and eligible liabilities for the purpose of internal MREL/internal TLAC</p>

	Breakdown of the amount of own funds and eligible liabilities for the purpose of internal MREL in accordance with 45f(3) BRRD, equal to iLAC EU-9
7	o/w residual maturity ≥ 1 year < 2 years Subset of row 6 with the relevant residual maturity
8	o/w residual maturity ≥ 2 year < 5 years Subset of row 6 with the relevant residual maturity
9	o/w residual maturity ≥ 5 years < 10 years Subset of row 6 with the relevant residual maturity
10	o/w residual maturity ≥ 10 years, but excluding perpetual securities Subset of row 6 with the relevant residual maturity
11	o/w perpetual securities Subset of row 6 that are perpetual securities

5. TLAC3: Creditor ranking – resolution entity

20. The outstanding amounts referred to in rows 2 to 10 have to be broken down into insolvency rankings on the basis of the insolvency law of the issuing entity, irrespective of the governing law of the instrument. The ranking is presented from the most junior to the more senior. Columns for rankings have to be added until the most senior ranking potentially eligible instrument, and all pari passu liabilities, have been reported.
21. Insolvency rankings shall be those communicated by the competent resolution authority in compliance with the standardised presentation specified in the relevant reporting template.
22. The table therefore contains all funding that is pari passu or junior to instruments potentially eligible for MREL, including own funds and other capital instruments, as well as the amount eligible under 45b(1) of Directive 2014/59/EU without applying the derogation of the second subparagraph of that provision. Therefore, any amount which would be deducted pursuant to article 72e CRR is reported in the relevant insolvency ranking; amounts that are ineligible solely as a result of subordination requirements are included in full in row n, except where the requirement according to 45b(1) BRRD.

Legal references and instructions	
Rows	Explanation
1	Empty set in the EU
2	Description of insolvency ranking (free text) The number of insolvency rankings (n) in the creditor hierarchy will depend on the set of liabilities of the entity. There is one column for each insolvency ranking. The description should include a specification of the types of claims that are within that insolvency class ranking (eg CET1, Tier 2 instruments).
3	Total liabilities and own funds including derivative liabilities (TLOF) Refer to the definitions included in template TLAC2
4	o/w excluded liabilities Refer to the definitions included in template TLAC2
5	TLOF less excluded liabilities TLOF net of excluded liabilities
6	Subset of row 4 that are own funds and liabilities for the purpose of MREL/TLAC Breakdown of the amount of own funds and liabilities eligible for the purpose of article 45b(1) BRRD without applying the derogation of the second subparagraph.
7	o/w residual maturity ≥ 1 year < 2 years Subset of row 6 with the relevant residual maturity
8	o/w residual maturity ≥ 2 year < 5 years Subset of row 6 with the relevant residual maturity
9	o/w residual maturity ≥ 5 years < 10 years Subset of row 6 with the relevant residual maturity
10	o/w residual maturity ≥ 10 years, but excluding perpetual securities Subset of row 6 with the relevant residual maturity

10	<p>o/w perpetual securities</p> <p>Subset of row 6 that are perpetual securities</p>
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6. Table EU CCA – Main features of regulatory capital instruments and eligible liabilities instruments.

23. Institutions shall apply the instructions provided in this Annex in order to complete the table as presented in Annex 5.
24. Institutions shall complete this table for the following categories: Common Equity Tier 1 instruments, Additional Tier 1 instruments, Tier 2 instruments and, within the meaning of Article 72b CRR, eligible liabilities instruments.
25. The tables shall comprise separate columns with the features of each regulatory capital and eligible liabilities instruments. In cases where different instruments of a same category have identical features, institutions may complete only one column disclosing these identical features and identify the issuances to which the identical features refer. When disclosing the columns for these instruments, institutions shall group them under three sections (horizontally along the table) to indicate whether they are for meeting (i) only capital (but not eligible liabilities) requirements; (ii) both capital and eligible liabilities requirements; or (iii) only eligible liabilities (but not capital) requirements.
26. In relation to eligible liabilities instruments that are not subordinated to excluded liabilities, institutions shall disclose only securities which are fungible, negotiable financial instruments, at the exclusion of loans and deposits.

Instructions for completing the capital and eligible liabilities instruments main features table	
1	<p>Identifies issuer legal entity.</p> <p><i>Free text</i></p>
2	<p>Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement).</p> <p><i>Free text</i></p>
2a	<p>Specifies if the instrument has been publicly or privately placed.</p>

	<i>Select from menu: [Public] [Private]</i>
3	<p>Specifies the governing law(s) of the instrument.</p> <p><i>Free text</i></p>
3a	<p>Contractual recognition of write down and conversion powers of resolution authorities</p> <p>Specifies whether the instrument contains a clause whereby, upon decision by a resolution authority or a relevant third country authority, the principal amount of the instruments is to be written down on a permanent basis or the instruments are to be converted into Common Equity Tier 1 instruments, in the meaning, where applicable, of the following provisions:</p> <ul style="list-style-type: none"> - In relation to Additional Tier 1 instruments, Article 52(1)(p) CRR; - In relation to Tier 2 instruments, Article 63 (n) or (o); - In relation to eligible liabilities, Article 72b(2)(n); - In relation to any of the above and governed by third country law, Article 55 of the BRRD. <p><i>A write down and conversion may be both compliant with Article 55 BRRD and any of the first three indents.</i></p> <p><i>Select from menu: [YES] [NO]</i></p>
4	<p>Specifies transitional regulatory capital treatment contained in CRR. The original classification of the instrument is the point of reference independently of possible reclassification in lower tiers of capital.</p> <p><i>Select from menu: [Common Equity Tier 1] [Additional Tier 1] [Tier 2] [Ineligible] [N/A]</i></p> <p><i>Free text – specify if a fraction of the issuance has been reclassified in lower tiers of capital.</i></p>
5	<p>Specifies regulatory capital treatment under CRR without taking into account the transitional treatment.</p> <p><i>Select from menu: [Common Equity Tier 1] [Additional Tier 1] [Tier 2]] [eligible</i></p>

	<i>liabilities] [Ineligible]</i>
6	<p>Specifies the level(s) within the group at which the instrument is included in the capital/eligible liabilities.</p> <p><i>Select from menu: [Solo] [(Sub-)Consolidated] [Solo and (Sub-)Consolidated]</i></p>
7	<p>Specifies instrument type, varying by jurisdiction.</p> <p><i>For CET1 instruments, select name of the instrument in the CET1 list published by the EBA pursuant to Article 26(3) of the CRR.</i></p> <p><i>For other instruments, select from: menu options to be provided to institutions by each jurisdiction – legal references of CRR articles for each type of instrument to be inserted</i></p>
8	<p>Specifies the amount recognised in regulatory capital or eligible liabilities (total amount of the instrument recognised before transitional provisions for the relevant level of the disclosure - currency used for the reporting obligations).</p> <p><i>Free text – specify in particular if some parts of the instruments are in different tiers of the regulatory capital and if the amount recognised in regulatory capital is different from the amount issued.</i></p>
9	<p>Nominal amount of instrument (in currency of issuance and currency used for the reporting obligations).</p> <p><i>Free text</i></p>
EU-9a	<p>Issue price of instrument.</p> <p><i>Free text</i></p>
EU-9b	<p>Redemption price of instrument.</p> <p><i>Free text</i></p>
10	<p>Specifies accounting classification.</p> <p><i>Select from menu: [Shareholders' equity] [Liability – amortised cost] [Liability – fair value option] [Non-controlling interest in consolidated subsidiary]</i></p>
11	<p>Specifies date of issuance.</p>

	<i>Free text</i>
12	Specifies whether dated or perpetual. <i>Select from menu: [Perpetual] [Dated]</i>
13	For dated instrument, specifies original maturity date (day, month and year). For perpetual instrument put 'no maturity'. <i>Free text</i>
14	Specifies whether there is an issuer call option (all types of call options). <i>Select from menu: [Yes] [No]</i>
15	For instrument with issuer call option, specifies first date of call if the instrument has a call option on a specific date (day, month and year) and, in addition, specifies whether the instrument has a tax and/or regulatory event call. Also specifies the redemption price. Helps to assess permanence. <i>Free text</i>
16	Specifies the existence and frequency of subsequent call dates, if applicable. Helps to assess permanence. <i>Free text</i>
17	Specifies whether the coupon/dividend is: either fixed over the life of the instrument, or floating over the life of the instrument, or currently fixed but will move to a floating rate in the future, or currently floating but will move to a fixed rate in the future. <i>Select from menu: [Fixed], [Floating] [Fixed to floating], [Floating to fixed]</i>
18	Specifies the coupon rate of the instrument and any related index that the coupon/dividend rate references. <i>Free text</i>
19	Specifies whether the non-payment of a coupon or dividend on the instrument prohibits the payment of dividends on common shares (i.e. whether there is a dividend stopper). <i>Select from menu: [yes], [no]</i>
EU-20a	Specifies whether the issuer has full discretion, partial discretion or no discretion over whether a coupon/dividend is paid. If the institution has full discretion to cancel coupon/dividend payments under all circumstances it must select 'fully discretionary'

	<p>(including when there is a dividend stopper that does not have the effect of preventing the institution from cancelling payments on the instrument). If there are conditions that must be met before payment can be cancelled (e.g. capital below a certain threshold), the institution must select ‘partially discretionary’. If the institution is unable to cancel the payment outside of insolvency the institution must select ‘mandatory’.</p> <p><i>Select from menu: [Fully discretionary] [Partially discretionary] [Mandatory]</i></p> <p><i>Free text (specify the reasons for discretion, existence of dividend pushers, dividend stoppers, ACSM)</i></p>
EU-20b	<p>Specifies whether the issuer has full discretion, partial discretion or no discretion over the amount of the coupon/dividend.</p> <p><i>Select from menu: [Fully discretionary] [Partially discretionary] [Mandatory]</i></p>
21	<p>Specifies whether there is a step-up or other incentive to redeem.</p> <p><i>Select from menu: [Yes] [No]</i></p>
22	<p>Specifies whether dividends / coupons are cumulative or noncumulative.</p> <p><i>Select from menu: [Noncumulative] [Cumulative] [ACSM]</i></p>
23	<p>Specifies whether instrument is convertible or not.</p> <p><i>Select from menu: [Convertible] [Nonconvertible]</i></p>
24	<p>Specifies the conditions under which the instrument will convert, including point of non-viability. Where one or more authorities have the ability to trigger conversion, the authorities shall be listed. For each of the authorities it shall be stated whether it is the terms of the contract of the instrument that provide the legal basis for the authority to trigger conversion (a contractual approach) or whether the legal basis is provided by statutory means (a statutory approach).</p> <p><i>Free text</i></p>
25	<p>Specifies whether the instrument will always convert fully, may convert fully or partially, or will always convert partially.</p> <p><i>Select from menu: [Always Fully] [Fully or Partially] [Always partially]</i></p>
26	<p>Specifies rate of conversion into the more loss absorbent instrument.</p> <p><i>Free text</i></p>

27	<p>For convertible instruments, specifies whether conversion is mandatory or optional.</p> <p><i>Select from menu: [Mandatory] [Optional] [NA] and [at the option of the holders] [at the option of the issuer] [at the option of both the holders and the issuer]</i></p>
28	<p>For convertible instruments, specifies instrument type convertible into. Helps to assess loss absorbency.</p> <p><i>Select from menu: [Common Equity Tier 1] [Additional Tier 1] [Tier 2] [Other]</i></p>
29	<p>If convertible, specify issuer of instrument it converts into.</p> <p><i>Free text</i></p>
30	<p>Specifies whether there is a write down feature.</p> <p><i>Select from menu: [Yes] [No]</i></p>
31	<p>Specifies the triggers at which write-down occurs, including point of non-viability. Where one or more authorities have the ability to trigger write-down, the authorities shall be listed. For each of the authorities it shall be stated whether it is the terms of the contract of the instrument that provide the legal basis for the authority to trigger write-down (a contractual approach) or whether the legal basis is provided by statutory means (a statutory approach)</p> <p><i>Free text</i></p>
32	<p>Specifies whether the instrument will always be written down fully, may be written down partially, or will always be written down partially. Helps assess the level of loss absorbency at write-down.</p> <p><i>Select from menu: [Always Fully] [Fully or Partially] [Always partially]]</i></p>
33	<p>For write down instrument, specifies whether write down is permanent or temporary.</p> <p><i>Select from menu: [Permanent] [Temporary] [NA]</i></p>
34	<p>Describes the write-up mechanism.</p> <p><i>Free text</i></p>
34a	<p>Type of subordination (only for eligible liabilities)</p> <p>Specifies whether the instrument meets any of the types of subordination described in Article 72b(2)(d) (i), (ii) or (iii) of the CRR.</p>

	<p><i>Select from menu:</i></p> <p><i>[Contractual] if the instrument meets the requirements set out in Article 72b(2)(d) (i) of the CRR;</i></p> <p><i>[Statutory] if the instrument meets the requirements set out in Article 72b(2)(d) (ii);</i></p> <p><i>[Structural] if the instrument meets the requirements set out in Article 72b(2)(d) (iii);</i></p> <p><i>[Exemption from subordination] where the instrument does not meet any of the abovementioned forms of subordination and provided the institution has been permitted, pursuant to Article 72b(4)CRR, to include unsubordinated liabilities as eligible liabilities items.</i></p>
EU-34b	<p>Specifies the ranking of the instrument in normal insolvency proceedings.</p> <p><i>As defined in [ITS on MREL reporting].</i></p>
35	<p>Specifies instrument to which it is most immediately subordinate. Where applicable, banks shall specify the column numbers of the instruments in the completed main features template to which the instrument is most immediately subordinate.</p> <p><i>Free text</i></p>
36	<p>Specifies whether there are non-compliant features.</p> <p><i>Select from menu: [Yes] [No]</i></p>
37	<p>If there are non-compliant features, institution shall specify which ones.</p> <p><i>Free text</i></p>
37a	<p>Institutions shall include the hyperlink that gives access to the prospectus of the issuance, including all the terms and conditions of the instrument.</p>

<p><u>Question for consultation</u></p> <p>Q5. Are the instructions, tables and templates clear and appropriate to the respondents?</p> <p>Q6. Do you identify any discrepancies between these templates and instructions and the calculation of the requirements set out in the underlying regulation?</p>

Q7. Do you agree that the new draft ITS fits the purpose of the underlying regulation?