

Please find herewith a few comments regarding the CEBS most welcome initiative, to help facilitate the establishment of comparable financial reporting information.

**Item 4: "Derivatives held for trading" (Page 8)**

> Introduce an additional disclosure requirement: "Specify netting rules applied, if any."

The financial statements reader needs to know the following, in order to be correctly informed:  
Have netting rules been applied only for legally enforceable netting contracts ?  
Have any other type of netting rules been applied ? If yes, provide a description of how the netting was actually made.

**Item 7: "Loans and receivables" (including financial leases) (page 11)**

> Complement the column "Impaired assets" with additional information regarding the liquidation value of collateral held against impaired loans.

> Moreover, additional granularity on allowances amounts would be welcome, like splitting between allowances for counterparty risks and allowances for country risks.

**Item 24 "Provisions" (Page 37)**

> 2 typos identified:  
garantees - > guarantees  
Contratual -> Contractual

**Item 39 "Impairment [...]" Table C "Allowances movements for credit losses" (Page 54):**

For Loans and advances only, split between the 2 categories of allowances:  
1 table for the specific allowances for individually assessed loans.  
1 table for the specific allowances for collectively assessed loans.  
1 table for the two allowances together.

Also the format for analyzing the development in the allowances on this item 39 table C Should be fully congruent (column titles, order of columns) with the item 24 "Provisions" table (Page 37)

This is important, because an informed reader needs to aggregate "allowances" (booked as contra-assets) with "provisions" for "credit commitments and guarantees" (booked as liabilities) numbers to get a full picture of the overall

reserving status of the bank's loan portfolio.

Finally, the column titles should have a footnote explaining how to easily reconcile the relevant numbers with the P&L credit loss expense charge.

Best regards,

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